Final Supplemental Environmental Impact Report for the Climate Compass Project

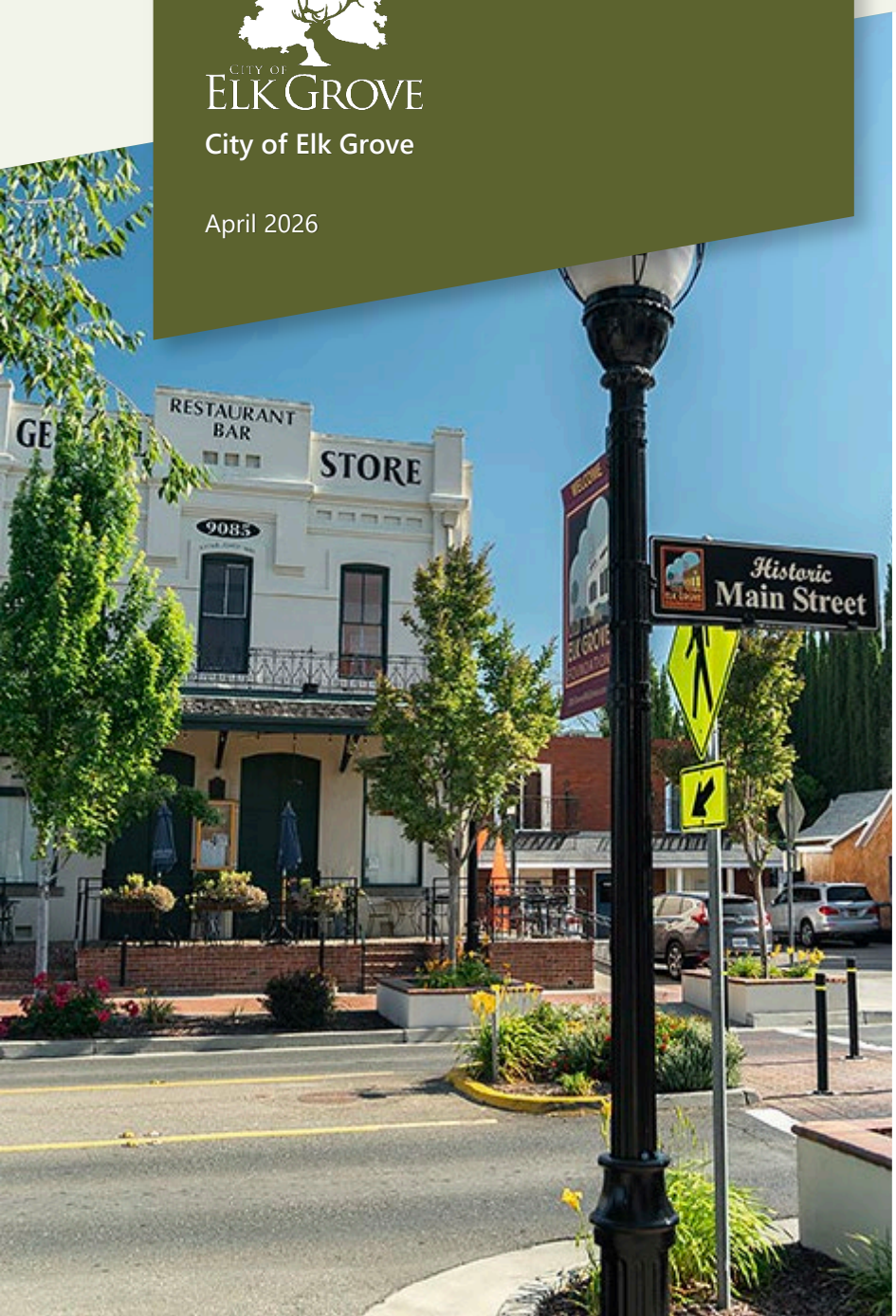
State Clearinghouse No. 2017062058

Prepared for:

CITY OF ELK GROVE

City of Elk Grove

April 2026



Final Supplemental Environmental Impact Report for the Climate Compass Project

State Clearinghouse No. 2017062058

Prepared for:

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Appendices

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LIST OF ABBREVIATIONS

BMPs	Best Management Practices
BIA	Building Industry Association
CARB's	California Air Resources Board's
CEQA	California Environmental Quality Act
City	City of Elk Grove
Plan	Climate Compass
GHG	greenhouse gas
LID	Low Impact Development
MEP	maximum extent practicable
$MTCO_2e$	metric tons of carbon dioxide equivalent
HEEHRA	Multi-Family Home Electrification and Appliance Rebates
NPDES	National Pollutant Discharge Elimination System
OAL	Office of Administrative Law
Sac Metro Air District	Sacramento Metropolitan Air Quality Management District
SB	Senate Bill
SWPPP	Storm Water Pollution Prevention Plan
SEIR	Supplemental Environmental Impact Report
TAG	Technical Advisory Group
USACE	United States Army Corps of Engineers
VMT	vehicle miles traveled
WDR	Waste Discharge Requirement

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1 INTRODUCTION

This final supplemental 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 Section 15132. This Final SEIR contains responses to comments received on the draft supplemental environmental impact report (Draft SEIR) for the proposed Climate Compass (Plan). The Plan is a comprehensive update to the City's current Climate Action Plan (CAP), adopted in 2019. The proposed Plan establishes a roadmap for the City to achieve its greenhouse gas (GHG) emission reduction targets and includes actions and strategies to adapt to anticipated climate-related impacts. In addition, the Plan aligns local efforts with Assembly Bill (AB) 1279, which requires California to achieve net-zero GHG emissions by 2045 and an 85 percent reduction in anthropogenic GHG emissions by 2045.

This 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. The SEIR is an amendment to the City's certified General Plan Update EIR (General Plan EIR) (SCH No. 2017062058), which programmatically evaluated both the General Plan Update (General Plan) and the 2019 CAP Update (2019 CAP) as separate documents.

1.1 PURPOSE AND INTENDED USES OF THIS FINAL SEIR

CEQA requires a lead agency that has prepared a Draft EIR (or SEIR) 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 (or SEIR). The Final EIR (or SEIR) 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 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 Climate Compass.

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.

Responsible, trustee, and interested agencies include:

- Sacramento Metropolitan Air Quality Management District,
- Sacramento Area Sewer District,
- Sacramento Municipal Utility District,
- Sacramento County Water Agency,
- Elk Grove Water District,
- Cosumnes Community Services District, and
- Elk Grove Unified School District.

1.2 PROJECT LOCATION

The General Plan Planning Area is 48.8 square miles (31,238 acres) and includes all land within the current city limits as well as lands outside the city limits in the four designated study areas (i.e., north, east, south, and west study areas). The Planning Area is generally bounded by Interstate 5 (I-5) on the west; Calvine Road and the City of Sacramento on the north; Grant Line Road and Deer Creek on the east; and Eschwinger Road on the south. State Route (SR) 99 traverses north–south, bisecting the city near its center.

Existing land uses within the city limits consist of residential at varying densities, commercial, office, industrial, park, and open space. Within the study areas, existing land uses primarily consist 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 Area Sewer District (SacSewer) bufferlands to the northwest. Major roadway access to the City is provided by I-5 and SR 99. Upon adoption, the Plan would serve as the long-term CAP for land uses within the City's jurisdiction within the General Plan Planning Area.

1.3 PROJECT OBJECTIVES

The primary objectives of the Plan are to:

- Develop an updated CAP to align the City's climate action planning with California's GHG reduction goals and relevant regulations aimed at climate mitigation.
- Implement strategies and actions to transition the city away from fossil fuels and realize deep GHG emissions reductions through the near- and long-term future.
- Connect and amplify existing sustainability efforts in a cohesive, impactful plan.
- Incorporate climate adaptation and resilience actions to address the city's most pressing natural and climate-related hazards.
- Develop a CEQA-qualified CAP to provide a mechanism for streamlining project-level GHG emissions analysis consistent with Section 15183.5 of the State CEQA Guidelines and the entitlement process for future sustainability projects and climate-friendly development within the city.
- Communicate climate challenges and opportunities, foster climate education, and empower the community to contribute to solutions.
- Ensure equitable climate action by prioritizing projects and programs that benefit historically underserved communities.
- Develop an updated CAP that is consistent with the recently adopted amendments to the City's General Plan in 2023, which was amended to increase development intensity to improve vehicle miles traveled (VMT) efficiency and reduce GHG emissions by creating walkable communities with amenities that attract and retain businesses and residents.

1.4 SUMMARY DESCRIPTION OF THE PROJECT

The Plan establishes strategies and actions to reduce GHG emissions generated from current and future activities within the city as well as GHG emissions generated by City facilities and operations. The Plan is structured to align with State and regional laws, policies, regulations, and plans to reduce GHG emissions and improve resilience to climate change-related impacts. State regulations related to GHG emissions that are applicable and were current at the time of the development of the Plan include Senate Bill (SB) 32 (2015-16 Legislative Session), AB 1279, and the California Air Resources Board's (CARB's) *2022 Scoping Plan for Achieving Carbon Neutrality* (2022 Scoping Plan) at the State level.

The Plan has been developed to provide:

- A baseline of major sources of GHG emissions;
- A projection of future GHG emissions expected to occur within the Planning Area or be generated by City operations;
- Targets for reducing GHG emissions to specified levels that are aligned with State laws and policies; and
- Strategies and actions to reduce GHG emissions to meet the targets.

More specifically, the Plan identifies the following:

- Baseline GHG emissions for the Planning Area and forecasts potential increases in these emissions over time, both for the Planning Area (i.e., "community") and for City operations.
- GHG emissions reduction targets for 2030 and 2045 in alignment with the State's GHG reduction goals as directed by the 2022 Scoping Plan and AB 1279.
- Strategies and actions to achieve the 2030 and 2045 GHG emissions reduction targets for both community and City operations.

1.5 MAJOR CONCLUSIONS OF THE ENVIRONMENTAL ANALYSIS

The Draft SEIR evaluates whether implementation of the Plan would result in new or substantially more severe impacts than what was evaluated within the General Plan EIR, as amended by the Subsequent EIR for the GPAs/VMT Standards Project in 2023 (hereinafter referred to as the 2023 Subsequent EIR). The General Plan EIR and 2023 Subsequent EIR identified a number of significant and unavoidable impacts. As discussed in greater detail in Chapter 3, "Environmental Setting, Impacts, and Mitigation Measures," of the Draft SEIR, adoption and implementation of the Plan would not result in any new or substantially more severe significant impacts than those disclosed in the General Plan EIR, as amended by the 2023 Subsequent EIR. No new or modified mitigation is proposed.

1.6 CEQA PUBLIC REVIEW PROCESS

On June 27, 2025, the City released the Draft SEIR for a 49-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 (https://www.elkgrove.gov/planning/environmental-review and https://elkgrove.gov/planning-resources-and-policies/climate-action-plan); and was made available at City Hall at 8401 Laguna Palms Way. A notice of availability (NOA) of the Draft SEIR was published in the local newspaper (the *Elk Grove Citizen*) and distributed by the City to a project-specific mailing list.

A public meeting was held at 6:00 pm on July 22, 2025, to provide an overview of the Draft SEIR. No comments were received during the public meeting.

As a result of these notification efforts, written comments were received from two agencies, one organization, and two individuals 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 proposed Climate Compass 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, comments received, and responses to the comments.

Chapter 3, "Revisions to the Draft SEIR," presents revisions to the Draft SEIR text made to amplify, clarify or make minor modifications or corrections.

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.

Appendix A contains copies of the comment letters received during the public review period.

Appendix B contains the textual edits proposed for Chapter 7, "Community and Resource Protection," of the City's General Plan to ensure internal consistency between the General Plan and the updated GHG emissions inventory and projections included in the Climate Compass.

2 RESPONSES TO COMMENTS

This chapter contains reproduced comments from letters received during the public review period for the Draft SEIR, which concluded on August 15, 2025. 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.

The comment letters below are reproduced exactly as they were submitted. Spelling, grammatical, and other errors in the original letters have not been corrected. Copies of the comment letters are provided in Appendix A.

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	Central Valley Regional Water Quality Control Board Peter Minkel, Engineering Geologist	August 15, 2025
A2	Sacramento Metropolitan Air Quality Management District Brianna Moland, Climate Coordinator, CEQA and Land Use Section	August 15, 2025
	ORGANIZATIONS	
O1	North State Building Industry Association Vance Jarrard, Government & Public Affairs Advocate	August 14, 2025
	INDIVIDUALS	
I1	Lynn Wheat	August 5, 2025
I2	Mi Nguyen	August 8, 2025

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 verbatim in their entirety. No edits have been made to the original comments, and spelling, grammatical, and other errors have been retained.

2.2.1 Agencies

Letter A1 Central Valley Regional Water Quality Control Board

Peter Minkel, Engineering Geologist
August 15, 2025

Comment A1-1

Pursuant to the State Clearinghouse's 27 June 2025 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the Request for Review for the Supplemental Environmental Impact Report for the City of Elk Grove Climate Compass Project, located in Sacramento County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

I. Regulatory Setting

Basin Plan

The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by the State Water Resources Control Board (State Water Board), Office of Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues. For more information on the Water Quality Control Plan for the Sacramento and San Joaquin River Basins, please visit our website:

http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/

Antidegradation Considerations

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Implementation Policy is available on page 74 at: https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_201805.pdf

In part it states:

- Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.

This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

II. Permitting Requirements

Construction Storm Water General Permit

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit), Construction General Permit Order No. 2009-0009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). For more information on the Construction General Permit, visit the State Water Resources Control Board website at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml

Phase I and II Municipal Separate Storm Sewer System (MS4) Permits1

The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at: http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at: http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml

[1] Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.

Industrial Storm Water General Permit

Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 2014-0057-DWQ. For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml

Clean Water Act Section 404 Permit

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACE). If a Section 404 permit is required by the USACE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements. If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACE at (916) 557-5250.

Clean Water Act Section 401 Permit – Water Quality Certification

If an USACE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications. For more information on the Water Quality Certification, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/water_issues/water_quality_certification/

Waste Discharge Requirements – Discharges to Waters of the State

If USACE determines that only non-jurisdictional waters of the State (i.e., "non-federal" waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation. For more information on the Waste Discharges to Surface Water NPDES Program and WDR processes, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/water_issues/waste_to_surface_water/

Projects involving excavation or fill activities impacting less than 0.2 acre or 400 linear feet of non-jurisdictional waters of the state and projects involving dredging activities impacting less than 50 cubic yards of non-jurisdictional waters of the state may be eligible for coverage under the State Water Resources Control Board Water Quality Order No. 2004-0004-DWQ (General Order 2004-0004). For more information on the General Order 2004-0004, visit the State Water Resources Control Board website at: https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf

Dewatering Permit

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Threat General Order) 2003-0003 or the Central Valley Water Board's Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Threat Waiver) R5-2018-0085. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at: http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf

For more information regarding the Low Threat Waiver and the application process, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2018-0085.pdf

Limited Threat General NPDES Permit

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for Limited Threat Discharges to Surface Water (Limited Threat General Order). A complete Notice of Intent must be submitted to the Central Valley Water Board to obtain coverage under the Limited Threat General Order. For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01.pdf

NPDES Permit

If the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit. For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/help/permit/

If you have questions regarding these comments, please contact me at (916) 464-4684 or Peter.Minkel2@waterboards.ca.gov.

Response A1-1

The comment provides a summary of the Water Board's authority, the Basin Plan, and permitting requirements. No specific issues related to the content, analysis, or conclusions in the Draft SEIR are raised in this comment. No further response is required.

Letter A2 Sacramento Metropolitan Air Quality Management District

Brianna Moland, Climate Coordinator, CEQA and Land Use Section
August 15, 2025

Comment A2-1

Thank you for routing the Draft Supplemental Environmental Impact Report (SEIR) for the Elk Grove Climate Compass Project to the Sacramento Metropolitan Air Quality Management District (Sac Metro Air District) for review. The Climate Compass is the City of Elk Grove's roadmap for implementing its climate, sustainability, and resilience goals, and it outlines climate action strategies to facilitate the achievement of greenhouse gas (GHG) reduction targets that are consistent with statewide climate goals. Climate action planning is an important tool for reducing GHG emissions and increasing climate resiliency. In 2024, global average surface temperature rose more than 1.5 degrees Celsius above pre-industrial levels. As temperatures continue to rise, local jurisdictions have the power to reduce their contributions to climate change by identifying and implementing measures that decrease or eliminate their GHG emissions. The City recognizes that it will need to take bold and ambitious action to combat the adverse effects of climate change and embed resiliency in its operations. Sac Metro Air District is providing the following comments to help improve and strengthen the Climate Compass and assist the City in its pursuit of 327,615 metric tons of carbon dioxide equivalent ($MTCO_2e$) reduced by 2030 and 322,498 $MTCO_2e$ reduced by 2045.

Response A2-1

The comment is an introductory statement and does not address the content, analysis, or conclusions in the Draft SEIR. Responses to specific comments concerning environmental issues are provided below.

Comment A2-2

Draft SEIR Comments

- The SEIR states that implementation of the Climate Compass would not result in any significant and unavoidable impacts. Emissions resulting from implementation of the Climate Compass would be insignificant compared to the overall reductions. To achieve the 2030 and 2045 GHG reduction targets, the City would need to guarantee implementation of the climate action strategies at the scale proposed in the Climate Compass. Sac Metro Air District applauds the inclusion of the Implementation and Monitoring Program and annual monitoring reports with monitoring metrics to track progress and identify where additional actions or resources may be necessary for implementation. With this viable implementation program, the City is holding itself accountable to community members and other stakeholders who are relying on the City to successfully implement each climate action strategy and meet the 2030 and 2045 targets. Sac Metro Air District looks forward to working with the City to implement these measures and achieve these climate goals.

Response A2-2

The comment provides a summary of the Climate Compass and its potential impacts. No specific issues related to the content, analysis, or conclusions in the Draft SEIR are raised in this comment. Responses to specific comments concerning environmental issues are provided below.

Comment A2-3

General Climate Compass Comments

- Using consistent language between the Climate Compass and the Climate Compass Dashboard would reduce confusion for the reader. The City uses "key performance indicators" and "objectives" to refer to quantifiable metrics that would track progress for each strategy. It was not clear if the objectives listed in Chapter 3: Climate Action Strategies and the key performance indicators listed on the Climate Compass Dashboard are supposed to be the same. Please provide clarification if there is a difference between the objectives and the key performance indicators.

- The Climate Compass states that "some strategies and actions could not be quantified or assigned key performance indicators due to limited data or a lack of suitable methods. "Unquantified or supporting measures can help the City implement quantified measures. Strategy CA-4 – Measure and Manage Climate Action Progress allows the City to document progress through annual reports that summarize GHG reduction efforts and key performance indicators. Sac Metro Air District believes that Strategy CA-4 could be used to track progress on supportive measures, ensuring that the City is in the best position to achieve deeper GHG emission reductions. Strategy CA-4 could also be used to create metrics specifically for tracking progress on the City Operations climate action strategies, which currently do not include performance metrics or key performance indicators.

Specific Climate Compass Comments

Strategy BE-1 – Electrify and Decarbonize Buildings

- In the objectives for Strategy BE-1, consider stating which appliances will be transitioned to zero-emission appliances. By intentionally naming zero-emission cooktops as an alternative and eliminating combustion appliances, the City could improve air quality, safety, and public health. Combustion fireplaces increase the risk of respiratory infections, chronic lung disease, lung cancer, heart disease, stroke, type 2 diabetes, and premature mortality.[1] Combustion stoves release hazardous air pollutants including methane, and they result in waste heat that could compound heat-related illnesses during high heat events.[2] Under Action BE-1.2, Sac Metro Air District recommends listing zero-emission alternatives for all combustion appliances used for space and water heating, cooking, and wood-burning.
  - To track progress in achieving the 2030 and 2045 objectives, the City could include the number and type of appliances that have transitioned to zero-emission alternatives.

[1] American Lung Association. 2022. Literature Review on the Impacts of Residential Combustion: Final Report. https://www.lung.org/getmedia/2786f983-d971-43ad-962b-8370c950cbd6/ICF_Impacts-of-Residential-Combustion_FINAL_071022.pdf

[2] Lebel, E. et al. 2022. Methane and NOx Emissions from Natural Gas Stoves, Cooktops, and Ovens in Residential Homes. ACS Publications. https://pubs.acs.org/doi/10.1021/acs.est.1c04707 -3

- Given current regulatory uncertainties regarding the passage of new reach codes, the City could provide resources that are useful tools for achieving additional GHG emission reductions. Building electrification incentive resources like the Multi-Family Home Electrification and Appliance Rebates (HEEHRA) (https://techcleanca.com/incentives/heehrarebates/) and Rewiring America's incentive calculator (https://homes.rewiringamerica.org/calculator) could assist with the implementation of Action BE-1.2.
- Action BE-1.2 and the proposed building energy retrofit plan should promote a whole-house approach for more efficient building electrification. Sac Metro Air District recommends that new construction be pre-wired for full electrification. In addition to lowering residents' utility bills, all-electric residential and commercial buildings typically result in energy savings for both building owners and residents.

Strategy BE-3 – Increase Local Renewable Energy Use and Storage

- In support of Strategy BE-3, Sac Metro Air District recommends adding the quantified "Onsite Solar Canopies" measure included in Sacramento's Comprehensive Capital Region Climate Priorities Plan.[3] This measure installs shade structure solar energy systems over parking lot areas and shifts electricity consumption from electricity providers to onsite renewable energy. A key performance indicator for this measure could include tracking the electricity generated by the solar energy systems.
  - Solar shade structures offer electric vehicle charging opportunities, and can keep electric vehicles cool, protecting their battery health and charging speeds. For any commercial parking lots where tree shading is not feasible, Sac Metro Air District recommends the installation of solar canopies to reduce urban heat islands, generate local renewable energy, and provide shade for parked vehicles.

[3] Sac Metro Air District. 2025. Comprehensive Capital Region Climate Priorities Plan. https://www.airquality.org/residents/climate-change/climate-pollution-reduction-grants -3 cont

- Action BE-3.1 calls for coordinating with SMUD in executing its 2030 Zero Carbon Plan. Please include specific actions the City would take in partnership with SMUD to maker renewable energy and battery storage upgrades more accessible for residents and businesses.
- Action BE-3.2 supports additional battery storage systems as a reliable backup power supply during emergencies or peak demand periods. To increase the projected GHG emission reductions from Action BE-3.2, the City could adopt the quantified "Battery Storage-Supported Microgrids" measure included in Sacramento's Comprehensive Capital Region Climate Priorities Plan. This measure adds onsite lithium-ion battery storage units to store excess renewable energy when paired with renewable energy systems such as solar energy systems. This measure increases local energy resilience since lithium-ion batteries are ideal for managing peak demands and provide short-term local back up power during power outages. A key performance indicator could include tracking the number of megawatts of battery storage installed.

Strategy TR-1 – Decrease Vehicle Miles Traveled

- The Climate Compass states that 93% of households have access to a car in Elk Grove. If residents do not see active transportation infrastructure as accessible or comfortable, they will drive to their destination instead. To shift behavior and encourage residents to use active transportation, the City should take steps to make sidewalks and bike lanes more pedestrian friendly. Shade infrastructure enhances pedestrian networks by making sidewalks more accessible and comfortable for a greater number of pedestrians. A new climate resilient street design standard could be developed to ensure that these sidewalks and bike lanes include proper shade infrastructure to reduce urban heat and facilitate active transportation. Sac Metro Air District also recommends prioritizing sidewalk and bike lane improvements in neighborhoods disproportionately impacted by urban heat.
- One of the objectives for Strategy TR-1 is to install 45 miles of new sidewalks and 50miles of new bike lanes. The City should clarify if these sidewalks and bike lanes are in addition to what is outlined in the City's Bicycle, Pedestrian, and Trails Master Plan. If they are additional, the City should develop a new implementing action specific to the installation of the new sidewalks and bike lanes. The new action should describe what type of bike lanes are planned, what criteria will be used to site the bike lanes, and how the sidewalks and bike lanes will be shaded.

Strategy TR-2 – Increase Zero-Emission Vehicle Adoption

- Through Action TR-2.2, the City would conduct a citywide study to identify optimal locations for public and multi-family residential EV charging stations. The City should consider coupling EV charging infrastructure with solar canopies over parking lots for increased shading and to offset EV charging costs. Sac Metro Air District also recommends including actions to address the electrification of medium- and heavy-duty vehicles and hydrogen fuel cell vehicles and related infrastructure.

Strategy TR-3 – Reduce Off-Road Transportation Emissions

- Sac Metro Air District is supportive of the transition to electric or hybrid alternatives. Renewable diesel use should be limited to instances where electric or hybrid alternatives are unavailable.
- The City should describe how emissions from agricultural equipment are captured in the Climate Compass.

Strategy RA-4 – Reduce Exposure to Extreme Heat and Mitigate the Urban Heat Island Effect

- When determining requirements for the use of cooling materials in the public realm, please consider thermal exposure for pedestrians. Cool pavements can be a useful urban heat island mitigation measure to reduce regional air temperature, but they should only be prioritized in paved areas where people are not likely to congregate, such as major freeways, highways, arterial roads and parking lots. Highly reflective materials may increase thermal load on pedestrians in the absence of adequate shade, and cool pavement installation should be avoided in unshaded plazas or areas with high pedestrian traffic, children's play areas, and outdoor patios.

- Sac Metro Air District applauds the City for using MaRTy, the mobile biometeorological instrument, to measure the mean radiant temperature of outdoor public spaces. The City should continue to use information from MaRTy to reduce extreme heat exposure for pedestrians, and Sac Metro Air District will remain a partner to the City as it builds amore heat resilient transportation system.

Thank you for the opportunity to review the draft SEIR and the Climate Compass. We hope that our recommendations and suggestions assist the City as it finalizes the Climate Compass which will serve as a citywide roadmap for climate mitigation and adaptation at a time when we urgently need sustained climate action.

If you have questions regarding these comments, please contact Brianna Moland, Climate Coordinator, at bmoland@airquality.org or (916) 317-0821.

Response A2-3

The comment addresses the draft Climate Compass and does not address the content, analysis, or conclusions in the Draft SEIR. This comment is not related to the adequacy of the CEQA document; therefore, no revisions to the Draft SEIR are necessary in response to this comment. As appropriate, adjustments have been made to the Climate Compass related to comments received. Revisions to the Climate Compass include the addition of implementation considerations (Chapter 5) and changes to five actions. The changed actions include the following:

- Revised BE-1.1 to remove residential from new construction reach code and added voluntary actions to encourage additional energy efficiency for new residential construction.
- Adjusted BE-1.3 to include broader support for energy efficiency upgrades for low-income households.
- Revised BE-1.5 to remove residential from existing building air conditioner to heat pump reach code.
- Removed CA-1.3.
- Adjusted RS-1.5 to provide for cool strategies or permeable pavement at City facilities.

2.2.2 Organizations

Letter O1 North State Building Industry Association

Vance Jarrard, Government & Public Affairs Advocate
August 14, 2025

Comment O1-1

On behalf of the North State Building Industry Association (BIA), representing more than 500 member companies in the homebuilding industry, I am writing to respectfully oppose the adoption of the City's Climate Compass unless the language expressing the City's intent to adopt a reach code is removed. As a participant in the City's Technical Advisory Group (TAG) that helped shape the Climate Compass, I appreciate how much work has gone into the formation of this document and the goals it strives to achieve. However, pursuing a reduction in greenhouse gas emissions through a reach code hinders the ability to create an attainable housing supply. Further, committing to the pursuit of a reach code at this time puts the City on a path that is ultimately unknowable.

The recent passage of AB 130 prohibits local governments from adopting reach codes until 2031, making any statement of intent premature and effectively meaningless for the next six years. Including such language now sends an unnecessary signal that the City is committed to imposing additional requirements at the earliest possible opportunity, regardless of future conditions. Those conditions could include the exacerbation of an already challenging affordability crisis. In today's volatile global economy, the cost of construction materials can change drastically in short periods of time, and it is impossible to predict what these costs will be six years from now. Committing today to a policy that could substantially increase housing costs in the future is speculative, risky, and directly contradicts the sentiment the City Council expressed at the public workshops held on this matter.

We also do not know what California's building codes will look like in 2031. State standards will almost certainly continue to evolve, and without knowing how far they will go, any current commitment to a future reach code lacks a factual basis. Such intent could prove redundant if state requirements already meet or exceed what a future reach code might impose.

For these reasons, we urge the Council to remove any reference to a reach code from the Climate Compass. This will allow the City to revisit the issue when it is legally permissible and when there is greater clarity on economic conditions and future state building standards. Until that time, the BIA and its members are committed to continuing to work with the City to create a reliable and efficient supply of attainable housing.

Response O1-1

The comment addresses the draft Climate Compass and does not address the content, analysis, or conclusions in the Draft SEIR. Therefore, no revisions to the Draft SEIR are necessary in response to this comment. As appropriate, adjustments have been made to the Climate Compass related to comments received; refer to Response A2-3 above.

The Draft SEIR included an alternative that removes reach code actions. See "Alternative 2: Removal of Reach Code Actions Alternative," which is described in Chapter 5, "Alternatives," of the Draft SEIR. As described therein, while this alternative would still meet the City's 2030 and 2045 greenhouse gas (GHG) reduction targets, Alternative 2 would not provide as large of a buffer for the City to meet its 2030 GHG reduction target compared to the Climate Compass.

2.2.3 Individuals

Letter I1 Lynn Wheat

August 5, 2025

Comment I1-1

I have reviewed the SEIR and have a question: Does this plan eliminate any of the existing significant and unavoidable impacts as identified under ES.4?

Response I1-1

The significant and unavoidable impacts listed in the Draft SEIR Executive Summary on pages ES-4 and ES-5 are the significant and unavoidable impacts that were identified in the General Plan EIR and 2023 Subsequent EIR. As discussed in Chapter 3, "Environmental Setting, Impacts, and Mitigation Measures," of the Draft SEIR, adoption and implementation of the Plan would not result in any new or substantially more severe significant impacts than those disclosed in the General Plan EIR, as amended by the 2023 Subsequent EIR. Furthermore, implementation of the Climate Compass would result in less severe GHG impacts than those disclosed in the General Plan EIR, as amended by the 2023 Subsequent EIR. For example, regarding Impact 3.2-1, "Generate GHG Emissions, Either Directly or Indirectly, That May Have a Significant Impact on the Environment," the Draft SEIR states on page 3.2-11:

- Implementation of the Climate Compass would achieve the City's 2030 and 2045 GHG emission reduction goals, consistent with statewide GHG reduction goals as identified in the 2022 Scoping Plan and directed by AB 1279. The Climate Compass would provide the City with the framework to meet its GHG emission reduction targets as development occurs under the General Plan, as amended by the GPAs/VMT Standards Project, beyond the buildout year 2030. Because the Climate Compass would be sufficient in meeting statewide GHG reduction targets, adopting and implementing the Climate Compass would not result in a new or more substantially severe impact than what was identified in the General Plan EIR, as amended by the 2023 Subsequent EIR. Implementation of the Climate Compass would reduce the significant and unavoidable impact from the 2023 Subsequent EIR to **less than significant**.

Furthermore, regarding Impact 3.2-2, "Conflict With an Applicable Plan, Policy, or Regulation Adopted for the Purpose of Reducing the Emissions of GHGs," the Draft SEIR states on page 3.2-16:

- The Climate Compass would achieve the City's overall goal to reduce GHG emissions consistent with statewide GHG reduction goals as established in the 2022 Scoping Plan, as set forth by AB 1279. In addition, the Climate Compass would be consistent with and support a variety of other State and local plans, policies, and regulations related to the reduction of GHG emissions. Therefore, the Climate Compass would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Furthermore, the Climate Compass would provide the mechanism for the City to achieve its long-term GHG reduction goals past 2030 consistent with current regulations, which was identified in the 2023 Subsequent EIR as necessary to address the city's long-term GHG impacts. For these reasons, adoption and implementation of the Climate Compass would result in a substantially less severe impact than what was identified in the General Plan EIR and the 2023 Subsequent EIR, and as such, this impact would be reduced to less than significant.

As shown in the above excerpts from the Draft SEIR, implementation of the Climate Compass would result in less severe GHG impacts than those disclosed in the General Plan EIR, as amended by the 2023 Subsequent EIR.

Comment I1-2

I notice under a number of strategies actions are described however measurable outcomes are not quantified. I believe for a plan to be successful some means of measurement needs to be identified for implementation of the actions.

Unfortunately, I will be out of town and unable to attend the Planning Commission meeting for the overview of the Climate Compass Draft SEIR.

Response I1-2

The comment addresses the draft Climate Compass and does not address the content, analysis, or conclusions in the Draft SEIR. Therefore, no revisions to the Draft SEIR are necessary in response to this comment. As appropriate, adjustments have been made to the Climate Compass related to comments received; refer to Response A2-3 above.

Letter I2 Mi Nguyen

August 8, 2025

Comment I2-1

I am an Elk Grove resident and I would like to provide feedback on the Climate Compass Draft SEIR. Specifically, I am interested in sharing my opinion regarding Strategy TR-1: Decrease Miles Traveled, focusing on the plans around installing new bike lanes.

I sincerely hope that our leaders will not overlook that new bike lanes alone will not reduce vehicle miles traveled - it is the installation of safe bike infrastructure that will encourage residents to choose a petrol-free travel option. Furthermore, safe bike infrastructure has the cascading effect of reduced carbon emissions, reduced road maintenance, and safer transportation for all.

Currently, there are existing lanes in Elk Grove that are technically marked as bike lanes, whether with solid white lines and/or green paint, but I, along with many fellow bike riders, feel unsafe riding on them.

A couple initial reasons for this:

- Many bike lane are drawn too narrow for cars to safely pass us.
- Most bike lanes are physically unprotected. The only road I've encountered with protected bike lanes are on Franklin Blvd - though those lanes have a separate maintenance issue where there is often debris and occasional glass that makes it unsafe for biking.
- Many fellow bike riders would agree that paint alone is not infrastructure, and we would love to see the city invest in infrastructure that makes it safe enough for families to ride together in the bike lane.

Some examples of bike infrastructure:

- Building one-way bike lanes
- Bike lanes wide enough to enable 2 bikers to ride side by side comfortably
- For roads with speeds of 30+mph, install heavy duty physical separators such as raised curbs or bollards

There is currently no bike lane within Elk Grove that I would feel safe biking with a younger child, and in order to promote car-free travel within a family friendly city, that should be a priority. I would be grateful if this could all be considered in the detailed plans of the Climate Compass.

Thank you so much for your time and consideration.

Response I2-1

The comment addresses the draft Climate Compass and does not address the content, analysis, or conclusions in the Draft SEIR. Therefore, no revisions to the Draft SEIR are necessary in response to this comment. As appropriate, adjustments have been made to the Climate Compass related to comments received; refer to Response A2-3 above.

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. As discussed in Chapter 2, "Response to Comments," of this Final SEIR, no changes to the Draft SEIR were necessary in response to any of the comments received on the Draft SEIR. The revisions to the Draft SEIR made below are to align the Final SEIR with the final version of the Climate Compass, where the majority of textual updates are related to adjustments in the wording of several action items and additional language related to anticipated implementation.

While there are textual updates to the Draft SEIR contained within this chapter, this information clarifies and expands on information in the Draft SEIR and does not constitute "significant new information" that identifies changes in environmental impacts requiring recirculation of the Draft SEIR. (See the Public Resources Code Section 21092.1 and State CEQA Guidelines Section 15088.5.) "Significant new information," as defined in State CEQA Guidelines Section 15088.5(a), means information added to an EIR (or SEIR) that changes the EIR (or SEIR) so as to deprive the public of a meaningful opportunity to comment on a "substantial adverse environmental effect" or a "feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement." Therefore, the addition of these textual edits do not trigger a recirculation of the Draft SEIR pursuant to Section 15088.5 of the CEQA Guidelines.

3.1 REVISIONS TO CHAPTER 2, PROJECT DESCRIPTION

To update the Final SEIR to align with the final Climate Compass, Action BE-1.1 on page 2-15 of the Draft SEIR is revised as follows:

Original:

Action BE-1.1: Adopt by ordinance a new building reach code based on cost-effectiveness studies, stakeholder outreach, and California Energy Commission approval that must be met by all residential and nonresidential new construction and major renovations.

Revised:

Action BE-1.1a: Adopt by ordinance a new building reach code (based on cost-effectiveness studies, stakeholder outreach, and subject to California Energy Commission approval) setting energy efficiency standards that must be met by all nonresidential new construction and major renovations.

Action BE-1.1b: Promote and encourage voluntary actions for the construction of new residential buildings that provide greater energy efficiency and reduced GHG emissions than otherwise required by the building codes.

To update the Final SEIR to align with the final Climate Compass, Action BE-1.3 on page 2-15 of the Draft SEIR is revised as follows:

Original:

Action BE-1.3: Explore partnerships with regional organizations or grant opportunities to develop a funding mechanism (e.g., revolving loan fund, grant program) to provide low-interest loans to low-income residents to cover the time-of-replacement/emergency replacement of water heaters and/or HVAC units with electric options.

Revised:

Action BE-1.3: Explore partnerships with regional organizations or grant opportunities to develop a funding mechanism (e.g., revolving loan fund, grant program) to support low-income households with covering the

cost of time-of-replacement/emergency replacement of water heaters and/or HVAC units with electric options, as well as any necessary electrical upgrades.

To update the Final SEIR to align with the final Climate Compass, Action BE-1.5 on page 2-15 of the Draft SEIR is revised as follows:

Original:

Action BE-1.5: Adopt voluntary CALGreen measures that encourage heat pump space conditioning installations when air conditioners are replaced in existing single-unit residential.

Revised:

Action BE-1.5: Adopt by ordinance a standard that is compliant with State and Federal law for the conversion of HVAC to heat pump systems for existing nonresidential buildings.

To update the Final SEIR to align with the final Climate Compass, Action TR-2.1 on page 2-17 of the Draft SEIR is revised as follows:

Original:

Action TR-2.1: Adopt a reach code for EV charging to meet CALGreen Tier 1 requirements to require new commercial development to equip parking spaces with EV charging receptacles.

Revised:

Action TR-2.1: Adopt an ordinance requiring higher EV charging infrastructure for new commercial development.

To update the Final SEIR to align with the final Climate Compass, Action TR-2.4 on page 2-17 of the Draft SEIR is revised as follows:

Original:

Action TR-2.4: Require new publicly accessible (non-car-lock) fueling stations to install one DC fast charger for each two fuel dispenser positions. This requirement may also satisfy the EV charger requirements for any on-site convenience store.

Revised:

Action TR-2.4: Require new publicly accessible (non-card-lock) fueling stations to include one DC fast charger for each two fuel dispenser positions, with a minimum of one half of the required DCFC chargers to be installed and the remainder of the spaces to be EV Capable. This requirement may also satisfy the EV requirements for any on-site convenience store.

To update the Final SEIR to align with the final Climate Compass, the measurable outcomes listed under Strategy BE-1, "Electrify and Decarbonize Buildings," in the Buildings and Energy subsection of Table 2-14, "Elk Grove Community GHG Emissions Reduction Strategies, Actions, and Measurable Outcomes," on page 2-15 of the Draft SEIR are revised as follows:

Original:

Buildings and Energy (BE)	
Strategy BE-1: Electrify and Decarbonize Buildings Measurable Outcomes ▶ 50% of new residential development all electric by 2030 and 100% by 2045. ▶ 50% of new nonresidential development all electric by 2030 and 100% by 2045. ▶ 14% of existing residential buildings retrofitted to be all electric by 2030 and 68% by 2045. ▶ 9% of existing nonresidential buildings retrofitted to be all electric by 2030 and 46% by 2045. ▶ 2,778 low-income housing units replace gas-powered HVAC units with heat pumps HVAC and heat pump water heaters by 2030. ▶ 27% of existing single-unit residential install heat pumps when replacing air conditioners by 2030 and 100% by 2045.	**Action BE-1.1:** Adopt by ordinance a new building reach code based on cost-effectiveness studies, stakeholder outreach, and California Energy Commission approval that must be met by all residential and nonresidential new construction and major renovations. **Action BE-1.2:** Develop a comprehensive building energy retrofit plan to transition existing residential and nonresidential buildings to all-electric. **Action BE-1.3:** Explore partnerships with regional organizations or grant opportunities to develop a funding mechanism (e.g., revolving loan fund, grant program) to provide low-interest loans to low-income residents to cover the time-of-replacement/emergency replacement of water heaters and/or HVAC units with electric options. **Action BE-1.4:** Partner with SMUD to explore offering on-bill financing or pay-as-you-save programs specifically for building electrification projects. **Action BE-1.5:** Adopt voluntary CALGreen measures that encourage heat pump space conditioning installations when air conditioners are replaced in existing single-unit residential.

Revised:

Buildings and Energy (BE)	
Strategy BE-1: Electrify and Decarbonize Buildings Measurable Outcomes ▶ 50% of new residential development all electric by 2030 and 100% by 2045. ▶ 50% of new nonresidential development all electric by 2030 and 100% by 2045. ▶ 14% of existing residential buildings retrofitted to be all electric by 2030 and 68% by 2045. ▶ 9% of existing nonresidential buildings retrofitted to be all electric by 2030 and 46% by 2045. ▶ 2,778 low-income housing units replace gas-powered HVAC units with heat pumps HVAC and heat pump water heaters by 2045. ▶ 100% of existing single-unit residential install heat pumps when replacing air conditioners by 2045.	**Action BE-1.1:** Adopt by ordinance a new building reach code based on cost-effectiveness studies, stakeholder outreach, and California Energy Commission approval that must be met by all residential and nonresidential new construction and major renovations. **Action BE-1.2:** Develop a comprehensive building energy retrofit plan to transition existing residential and nonresidential buildings to all-electric. **Action BE-1.3:** Explore partnerships with regional organizations or grant opportunities to develop a funding mechanism (e.g., revolving loan fund, grant program) to provide low-interest loans to low-income residents to cover the time-of-replacement/emergency replacement of water heaters and/or HVAC units with electric options. **Action BE-1.4:** Partner with SMUD to explore offering on-bill financing or pay-as-you-save programs specifically for building electrification projects. **Action BE-1.5:** Adopt voluntary CALGreen measures that encourage heat pump space conditioning installations when air conditioners are replaced in existing single-unit residential.

To update the Final SEIR to align with the final Climate Compass, the actions listed under Strategy CA-1, "Conduct Meaningful Community Outreach," in the Climate Action Commitment subsection of Table 2-14, "Elk Grove Community GHG Emissions Reduction Strategies, Actions, and Measurable Outcomes," on page 2-20 of the Draft SEIR are revised as follows:

Original:

Climate Action Commitment	
Strategy CA-1: Conduct Meaningful Community Outreach Measurable Outcomes ▶ Not quantified	**Action CA-1.1:** Implement the Climate Ambassador Program as a permanent program, which recruits and trains volunteers to serve as local sustainability champions and educators. **Action CA-1.2:** Develop a neighborhood resilience committee program to increase connectedness among the community and provide support during climate hazard events. **Action CA-1.3:** Continue to encourage and connect residents with Property Assessed Clean Energy (PACE) programs, such as the Home Energy Renovation Opportunity (HERO) and CaliforniaFirst, which serve as an innovative mechanism for financing energy efficiency and renewable energy improvements on residential and commercial properties. **Action CA-1.4:** Partner with SMUD to establish a comprehensive community outreach and education campaign to raise awareness about the benefits of building electrification, available incentives and programs, and the importance of decarbonizing the building sector. **Action CA-1.5:** Partner with SMUD to promote its Residential, Neighborhood, and Commercial SolarShares programs, which allow residential customers, commercial customers, and developers to purchase renewably sourced electricity without having a solar system on site. **Action CA-1.6:** Work with regional partner agencies and utilities, such as SMAQMD and SMUD, to promote rebates and incentives for installing both residential and nonresidential renewable energy (e.g., solar) and battery storage systems.

Revised:

Climate Action Commitment	
Strategy CA-1: Conduct Meaningful Community Outreach Measurable Outcomes ▶ Not quantified	**Action CA-1.1:** Implement the Climate Ambassador Program as a permanent program, which recruits and trains volunteers to serve as local sustainability champions and educators. **Action CA-1.2:** Develop a neighborhood resilience committee program to increase connectedness among the community and provide support during climate hazard events. **Action CA-1.3:** Partner with SMUD to establish a comprehensive community outreach and education campaign to raise awareness about the benefits of building electrification, available incentives and programs, and the importance of decarbonizing the building sector. **Action CA-1.4:** Partner with SMUD to promote its Residential, Neighborhood, and Commercial SolarShares programs, which allow residential customers, commercial customers, and developers to purchase renewably sourced electricity without having a solar system on site. **Action CA-1.5:** Work with regional partner agencies and utilities, such as SMAQMD and SMUD, to promote rebates and incentives for installing both residential and nonresidential renewable energy (e.g., solar) and battery storage systems.

To update the Final SEIR to align with the projected GHG emissions reductions of the final Climate Compass, Table 2-15, "Community GHG Emissions Reduction Strategies," and the corresponding paragraph on pages 2-21 and 2-22 of the Draft SEIR are revised as follows:

Original:

Table 2-15 Community GHG Emissions Reduction Strategies

Strategy Number	Strategy Name	GHG Reductions ($MTCO_2e$)	
		2030	2045
Buildings and Energy (BE)			
BE-1	Electrify and Decarbonize Buildings	36,436	199,967
BE-2	Increase Density and Expand Affordable Housing	Included in TR-1	Included in TR-1
BE-3	Increase Local Renewable Energy Use and Storage	280,438	0
BE-4	Reduce Energy Consumption and Energy Burden	Included in BE-1	Included in BE-1
	Buildings and Energy Subtotal	**316,875**	**199,967**
Transportation (TR)			
TR-1	Decrease Vehicle Miles Traveled	4,864	5,281
TR-2	Increase Zero-Emission Vehicle Adoption	49,607	110,886
TR-3	Reduce Off-Road Transportation Emissions	9,542	10,856
	Transportation Subtotal	**64,013**	**127,023**
Resilience and Adaptation (RA)			
RA-1	Improve Climate and Emergency Preparedness	N/A	N/A
RA-2	Build Capacity for Current and Future Flooding	N/A	N/A
RA-3	Protect Populations from Wildfire Smoke	N/A	N/A
RA-4	Reduce Exposure to Extreme Heat and Mitigate the Urban Heat Island Effect	Included in RA-5	Included in RA-5
RA-5	Expand the Urban Tree Canopy	185	880
RA-6	Expand Nature-Based Solutions	NA	NA
	Resilience and Adaptation Subtotal	**185**	**880**
Resource Consumption (RC)			
RC-1	Increase Organic Waste Diversion	4,755	28,775
RC-2	Promote a Circular Economy	Included in RC-1	Included in RC-1
RC-3	Reduce Water Use	140	0
	Resource Consumption Subtotal	**4,895**	**28,775**
Green Economy (GE)			
GE-1	Support Green Businesses	N/A	N/A
	Green Economy Subtotal	**N/A**	**N/A**
Climate Action Commitment (CA)			
CA-1	Conduct Meaningful Community Outreach	N/A	N/A
CA-2	Provide Community Education on Public Health and Wellbeing	N/A	N/A
CA-3	Provide Community Education on Water Efficiency	N/A	N/A

Strategy Number	Strategy Name	GHG Reductions ($MTCO_2e$)	
		2030	2045
CA-4	Measure and Manage Climate Action Progress	N/A	N/A
	Climate Action Commitment Subtotal	**N/A**	**N/A**
	Total Reductions from Strategies	**385,968**	**356,645**
	Reduction Needed to Meet Target	*327,615*	*322,498*
	Target Met?	Yes	Yes
	Remaining Gap to Target	-58,353	-34,148

Notes: Total may not sum exactly due to independent rounding. GHG = greenhouse gas; $MTCO_2e$ = metric tons of carbon dioxide equivalent; N/A = not applicable.

Source: City of Elk Grove 2025.

The total estimated community GHG emissions reductions from all strategies quantified would be 385,968 $MTCO_2e$ in 2030 and 356,645 $MTCO_2e$ in 2045. The total estimated reductions from all GHG emissions reduction strategies would be sufficient to meet the 2030 and 2045 targets.

Revised:

Table 2-15 Community GHG Emissions Reduction Strategies

Strategy Number	Strategy Name and Quantified Actions[1]	GHG Reductions ($MTCO_2e$) 2030	GHG Reductions ($MTCO_2e$) 2045
Buildings and Energy (BE)			
BE-1	Electrify and Decarbonize Buildings	30,882	176,030
BE-2	Increase Density and Expand Affordable Housing	Included in TR-1	Included in TR-1
BE-3	Increase Local Renewable Energy Use and Storage	280,438	0
BE-4	Reduce Energy Consumption and Energy Burden	Included in BE-1	Included in BE-1
	Buildings and Energy Subtotal	**311,321**	**176,030**
Transportation (TR)			
TR-1	Decrease Vehicle Miles Traveled	4,864	5,281
TR-2	Increase Zero-Emission Vehicle Adoption	49,607	110,886
TR-3	Reduce Off-Road Transportation Emissions	9,542	10,856
	Transportation Subtotal	**64,013**	**127,023**
Resilience and Adaptation (RA)			
RA-1	Improve Climate and Emergency Preparedness	N/A	N/A
RA-2	Build Capacity for Current and Future Flooding	N/A	N/A
RA-3	Protect Populations from Wildfire Smoke	N/A	N/A
RA-4	Reduce Exposure to Extreme Heat and Mitigate the Urban Heat Island Effect	Included in RA-5	Included in RA-5
RA-5	Expand the Urban Tree Canopy	185	880
RA-6	Expand Nature-Based Solutions	Included in RA-5	Included in RA-5
	Resilience and Adaptation Subtotal	**185**	**880**

Strategy Number	Strategy Name and Quantified Actions[1]	GHG Reductions ($MTCO_2e$) 2030	GHG Reductions ($MTCO_2e$) 2045
Resource Consumption (RC)			
RC-1	Increase Organic Waste Diversion	4,755	28,775
RC-2	Promote a Circular Economy	Included in RC-1	Included in RC-1
RC-3	Reduce Water Use	140	0
	Resource Consumption Subtotal	**4,895**	**28,775**
Green Economy (GE)			
GE-1	Support Green Businesses	N/A	N/A
	Green Economy Subtotal	**N/A**	**N/A**
Climate Action Commitment (CAC)			
CA-1	Conduct Meaningful Community Outreach	N/A	N/A
CA-2	Provide Community Education on Public Health and Wellbeing	N/A	N/A
CA-3	Provide Community Education on Water Efficiency	N/A	N/A
CA-4	Measure and Manage Climate Action Progress	N/A	N/A
	Climate Action Commitment Subtotal	**N/A**	**N/A**
Total Reductions from Strategies		**380,646**	**333,017**
Reduction Needed to Meet Target		327,615	322,498
Target Met?		**Yes**	**Yes**
Remaining Gap to Target		-53,031	-10,519

Notes: Total may not sum exactly due to independent rounding. GHG = greenhouse gas; $MTCO_2e$ = metric tons of carbon dioxide equivalent; N/A = not applicable.

Source: City of Elk Grove 2026.

The total estimated community GHG emissions reductions from all strategies quantified would be 380,646 $MTCO_2e$ in 2030 and 333,017 $MTCO_2e$ in 2045. The total estimated reductions from all GHG emissions reduction strategies would be sufficient to meet the 2030 and 2045 targets.

To update the Final SEIR to align with the final Climate Compass, Action BF-1.1 on page 2-24 of the Draft SEIR is revised as follows:

Original:

Action BF-1.1: Adopt a policy that requires all new City buildings to be all-electric starting in 2026, and additionally, that requires existing buildings purchased by the City to be fully electrified within five years of purchase.

Revised:

Action BF-1.1: Adopt a policy that requires all new City buildings to be all-electric starting in 2026, and additionally, that requires existing buildings purchased by the City to be fully electrified with remodeling/upgrades.

To update the Final SEIR to align with the final Climate Compass, Action RS-1.5 on page 2-25 of the Draft SEIR is revised as follows:

Original:

Action RS-1.5: Install cool pavement and permeable pavement on all City parking lots to help reduce the urban heat island effect and provide additional flood protection, prioritizing permeable pavement in lots or areas

that are more flood-prone. Test different types of cool and permeable pavement materials, and based on results, develop guidelines for broader implementation throughout the city.

Revised:

Action RS-1.5: Install cooling strategies and/or permeable pavement on COEG parking lots to help reduce the urban heat island effect and provide additional flood protection, prioritizing permeable pavement in lots or areas that are more flood prone. Test different types of cool and permeable pavement materials, and based on results, develop guidelines for broader implementation throughout the city.

To provide additional information, the following paragraph has been added to Subsection 2.5.3, "Project Consistency with Applicable Plans," to discuss the textual modifications made to the Chapter 7, "Community and Resource Protection," of the City's General Plan to ensure internal consistency with the Climate Compass:

Original:

The Climate Compass was developed in the context of existing regional and City plans that support the reduction of GHG emissions as well as prepare the city for climate-related hazards and effects. The Plan is consistent with the following plans:

- City of Elk Grove General Plan;
- City of Elk Grove Local Hazard Mitigation Plan;
- City of Elk Grove Community Mobility Resiliency Plan;
- City of Elk Grove Bike, Pedestrian, and Trails Master Plan;
- SMAQMD's Capital Region Climate Priorities Plan; and
- SMUD's 2030 Zero Carbon Plan.

Revised:

The Climate Compass was developed in the context of existing regional and City plans that support the reduction of GHG emissions as well as prepare the city for climate-related hazards and effects. The Plan is consistent with the following plans:

- City of Elk Grove General Plan;
- City of Elk Grove Local Hazard Mitigation Plan;
- City of Elk Grove Community Mobility Resiliency Plan;
- City of Elk Grove Bike, Pedestrian, and Trails Master Plan;
- SMAQMD's Capital Region Climate Priorities Plan; and
- SMUD's 2030 Zero Carbon Plan.

Upon adoption of the Climate Compass, Chapter 7, "Community and Resource Protection," of the City's General Plan would be textually modified to ensure internal consistency between the General Plan and the updated GHG emissions inventory and projections included in the Plan. The proposed textual modifications to the General Plan are included as Appendix B of the Draft EIR.

3.2 REVISIONS TO CHAPTER 3, ENVIRONMENTAL SETTING, IMPACTS, AND MITIGATION MEASURES

To update the Final SEIR to align with the terminology of the final Climate Compass, the second full paragraph under "Air Quality" on page 3-4 of the Draft SEIR is revised as follows:

Original:

Implementation of the strategies and actions of the Climate Compass would involve the construction and operation of new small-scale facilities, such as EV charging stations, solar photovoltaic or battery storage systems; construction of cool roofs and pavements; and retrofitting older infrastructure and facilities with newer, more energy efficient technology. While the Climate Compass includes strategies and associated actions based on newer technologies and updated reach codes, the types of facilities that would be constructed and operated under the Plan are similar in nature to those described in the 2019 CAP and air pollutant emissions from development activities evaluated within the General Plan EIR, as amended by the 2023 Subsequent EIR. Therefore, implementation of the Climate Compass would not result in new significant impacts or substantially increase the severity of significant environmental impacts disclosed within the General Plan EIR, as amended by the 2023 Subsequent EIR. No further assessment of air quality is warranted.

Revised:

Implementation of the strategies and actions of the Climate Compass would involve the construction and operation of new small-scale facilities, such as EV charging stations, solar photovoltaic or battery storage systems; construction of cool roofs and pavements; and retrofitting older infrastructure and facilities with newer, more energy efficient technology. While the Climate Compass includes strategies and associated actions based on newer technologies and new energy efficiency standards, the types of facilities that would be constructed and operated under the Plan are similar in nature to those described in the 2019 CAP and air pollutant emissions from development activities evaluated within the General Plan EIR, as amended by the 2023 Subsequent EIR. Therefore, implementation of the Climate Compass would not result in new significant impacts or substantially increase the severity of significant environmental impacts disclosed within the General Plan EIR, as amended by the 2023 Subsequent EIR. No further assessment of air quality is warranted.

3.3 REVISIONS TO SECTION 3.1, ENERGY

To update the Final SEIR to align with the terminology of the final Climate Compass, the second full paragraph on page 3.1-8 of the Draft SEIR is revised as follows:

Original:

While the majority of the Climate Compass strategies and actions provide the policy framework for the City, implementation of Actions FEC-2.1, TR-2.1, TR-2.4, RS-1.5, TR-1.1, TR-1.2, BF-2.2, RS-1.3, RS-1.6, and WW-1.2 could directly result in construction activities. These activities could include, but not be limited to, installation of new EV charging stations with residential and municipal parking lots as part of new codes and ordinances (Actions FEC-2.1, TR-2.1, TR-2.4); promotion of cool pavement and permeable pavement on all municipal parking lots (Action RS-1.5); development of transportation infrastructure as detailed in the Bicycle, Pedestrian, and Trails Master Plan (Action TR-1.1); construction of transit amenities such as seating, lighting, tree cover, and real-time public transit arrival information displays (Action TR-1.2); construction of renewable energy generation and storage projects at municipal facilities (Action BF-2.2); retrofitting existing municipal buildings and facilities to improve their resilience to climate hazards (Action RS-1.3), installation of shade amenities such as trees and shade structures (Action RS-1.6); and upgrading municipal irrigation systems to be more water efficient (Action WW-1.2). This contrasts with other actions, such as establishing or expanding programs, facilitating partnerships with utilities or state agencies, developing educational campaigns, or creating incentive programs that do not directly require activities that would result in construction.

Revised:

While the majority of the Climate Compass strategies and actions provide the policy framework for the City, implementation of Actions FEC-2.1, TR-2.1, TR-2.4, RS-1.5, TR-1.1, TR-1.2, BF-2.2, RS-1.3, RS-1.6, and WW-1.2 could directly result in construction activities. These activities could include, but not be limited to, installation of new EV charging stations with commercial and municipal parking lots as part of new codes and ordinances (Actions FEC-2.1, TR-2.1, TR-2.4); promotion of cooling strategies and/or permeable pavement on all municipal-

owned parking lots (Action RS-1.5); development of transportation infrastructure as detailed in the Bicycle, Pedestrian, and Trails Master Plan (Action TR-1.1); construction of transit amenities such as seating, lighting, tree cover, and real-time public transit arrival information displays (Action TR-1.2); construction of renewable energy generation and storage projects at municipal facilities (Action BF-2.2); retrofitting existing municipal buildings and facilities to improve their resilience to climate hazards (Action RS-1.3), installation of shade amenities such as trees and shade structures (Action RS-1.6); and upgrading municipal irrigation systems to be more water efficient (Action WW-1.2). This contrasts with other actions, such as establishing or expanding programs, facilitating partnerships with utilities or state agencies, developing educational campaigns, or creating incentive programs that do not directly require activities that would result in construction.

To update the Final SEIR to align with the terminology of the final Climate Compass, the first full paragraph on page 3.1-9 of the Draft SEIR is revised as follows:

Original:

As identified in the Climate Compass, GHGs in the city are primarily emitted from sources that combust fossil fuels for energy, such as gasoline and diesel fuels in cars and natural gas in buildings. Thus, the Plan aims to reduce GHG emissions by reducing fossil fuel use and improving energy efficiency in the community and in City operations. Notably, the majority of GHG reductions associated with the Plan would be achieved through strategies and actions that target reductions to fossil fuel consumption and improvements in energy efficiency in the community. This is because community operations emit a greater amount of GHGs than city operations and thus require more vigorous improvements to energy efficiency and reductions in fossil fuels. In regard to increasing energy efficiency and reduced energy demand in community buildings, the Plan includes Strategies BE-1, "Electrify and Decarbonize Buildings," BE-3, "Increase Local Renewable Energy Use and Storage," and BE-4, "Reduce Energy Consumption and Energy Burden," and subsequent actions (BE-1.1 through BE-1.5, BE-3.1 through BE-3.2, and BE-4.1 through BE-4.3), which would result in decreased dependency on fossil gas within the community building sector, while also promoting energy efficiency through adherence to voluntary standards of the CALGreen Code and partnerships with SMUD. By increasing the use of electricity (including electricity sourced from renewables) and decreasing the use of fossil fuel combustion, implementation of the Plan would also reduce the combustion of fossil fuels used for building energy in the community. For a comprehensive list of community-building energy-related strategies, their associated actions, and the measurable outcomes related to their implementation, see Table 2-14 in Chapter 2, "Project Description."

Revised:

As identified in the Climate Compass, GHGs in the city are primarily emitted from sources that combust fossil fuels for energy, such as gasoline and diesel fuels in cars and natural gas in buildings. Thus, the Plan aims to reduce GHG emissions by reducing fossil fuel use and improving energy efficiency in the community and in City operations. Notably, the majority of GHG reductions associated with the Plan would be achieved through strategies and actions that target reductions to fossil fuel consumption and improvements in energy efficiency in the community. This is because community operations emit a greater amount of GHGs than city operations and thus require more vigorous improvements to energy efficiency and reductions in fossil fuels. In regard to increasing energy efficiency and reduced energy demand in community buildings, the Plan includes Strategies BE-1, "Electrify and Decarbonize Buildings," BE-3, "Increase Local Renewable Energy Use and Storage," and BE-4, "Reduce Energy Consumption and Energy Burden," and subsequent actions (BE-1.1 through BE-1.5, BE-3.1 through BE-3.2, and BE-4.1 through BE-4.3), which would result in decreased dependency on fossil gas within the community building sector, while also promoting energy efficiency through adoption of energy efficiency standards and partnerships with SMUD. By increasing the use of electricity (including electricity sourced from renewables) and decreasing the use of fossil fuel combustion, implementation of the Plan would also reduce the combustion of fossil fuels used for building energy in the community. For a comprehensive list of community-building energy-related strategies, their associated actions, and the measurable outcomes related to their implementation, see Table 2-14 in Chapter 2, "Project Description."

3.4 REVISIONS TO SECTION 3.2, GREENHOUSE GAS EMISSIONS

To update the Final SEIR to align with the terminology of the final Climate Compass, the first full paragraph on page 3.2-13 of the Draft SEIR is revised as follows:

Original:

The strategies and actions that may require construction activities and as such, have the potential to directly or indirectly emit GHG emissions, include but not limited to, installation of new EV charging stations with residential and municipal parking lots as part of new codes and ordinances (Actions FEC-2.1, TR-2.1, TR-2.4); promoting installation of cool pavement and permeable pavement on all municipal parking lots (Action RS-1.5); development of transportation infrastructure as detailed in the Bicycle, Pedestrian, and Trails Master Plan (Action TR-1.1); construction of amenities such as seating, lighting, tree cover, and real-time public transit arrival information displays (Action TR-1.2); construction of new renewable energy generation and storage projects on municipal buildings (Action BF-2.2); retrofitting existing municipal buildings and facilities to improve their resilience to climate hazards (Action RS-1.3), installation of shade amenities such as trees and shade structures (Action RS-1.6); and upgrading municipal-owned and Cosumnes Community Services District-managed irrigation systems to be more water efficient (Action WW-1.2).

Revised:

The strategies and actions that may require construction activities and as such, have the potential to directly or indirectly emit GHG emissions, include but not limited to, installation of new EV charging stations with residential and municipal parking lots as part of new codes and ordinances (Actions FEC-2.1, TR-2.1, TR-2.4); promoting installation of cooling strategies and/or permeable pavement on all municipal-owned parking lots (Action RS-1.5); development of transportation infrastructure as detailed in the Bicycle, Pedestrian, and Trails Master Plan (Action TR-1.1); construction of amenities such as seating, lighting, tree cover, and real-time public transit arrival information displays (Action TR-1.2); construction of new renewable energy generation and storage projects on municipal buildings (Action BF-2.2); retrofitting existing municipal buildings and facilities to improve their resilience to climate hazards (Action RS-1.3), installation of shade amenities such as trees and shade structures (Action RS-1.6); and upgrading municipal-owned and Cosumnes Community Services District-managed irrigation systems to be more water efficient (Action WW-1.2).

To update the Final SEIR to align with the projected GHG emissions reductions of the final Climate Compass, the second full paragraph on page 3.2-14 of the Draft SEIR is revised as follows:

Original:

Despite some operational emissions occurring with the implementation of the Climate Compass, the Plan would reduce overall GHG emissions from sources in the community and City operations. Notably, the majority of GHG reductions would be achieved through the community GHG reduction strategies and actions detailed in Table 2-14 of Chapter 2, "Project Description." The total estimated community GHG emissions reductions from all strategies quantified would be 385,968 $MTCO_2e$ in 2030 and 356,645 $MTCO_2e$ in 2045. Thus, there would be greater overall reductions to fossil fuel consumption and improvements in energy efficiency related to the implementation of the community GHG reduction strategies and their associated actions relative to energy-related reductions and improvements related to municipal-focused strategies and actions (2,501 $MTCO_2e$ in 2030 and 2,450 $MTCO_2e$ in 2045).

Revised:

Despite some operational emissions occurring with the implementation of the Climate Compass, the Plan would reduce overall GHG emissions from sources in the community and City operations. Notably, the majority of GHG reductions would be achieved through the community GHG reduction strategies and actions detailed in Table 2-14 of Chapter 2, "Project Description." The total estimated community GHG emissions reductions from all strategies quantified would be 380,646 $MTCO_2e$ in 2030 and 333,017 $MTCO_2e$ in 2045. Thus, there would be greater overall reductions to fossil fuel consumption and improvements in energy efficiency related to the implementation of the community GHG reduction strategies and their associated actions relative to

energy-related reductions and improvements related to municipal-focused strategies and actions (2,501 $MTCO_2e$ in 2030 and 2,450 $MTCO_2e$ in 2045).

To update the Final SEIR to align with the terminology of the final Climate Compass, the fourth full paragraph on page 3.2-14 of the Draft SEIR is revised as follows:

Original:

The Climate Compass would be beneficial in terms of reducing energy-related GHG emissions as implemented through community Strategies BE-1, BE-3, and BE-4 and subsequent actions (BE-1.1 through BE-1.5, BE-3.1 through BE-3.2, and BE-4.1 through BE-4.3) and municipal Strategies BF-1, BF-2, and BF-3, and subsequent actions (BF-1.1 through BF-1.3, BF-2.1 through BF-2.3, and BF-3.1 through BF-3.4). For example, implementation of Action BE-1.1 recommends adoption of a new ordinance that establishes a new building reach code based on cost-effectiveness studies, stakeholder outreach, and CEC approval that all residential and nonresidential new construction and major renovations must meet. Action BE-1.2 requires developing a comprehensive building energy retrofit plan to transition existing residential and nonresidential buildings to all-electric.

Revised:

The Climate Compass would be beneficial in terms of reducing energy-related GHG emissions as implemented through community Strategies BE-1, BE-3, and BE-4 and subsequent actions (BE-1.1 through BE-1.5, BE-3.1 through BE-3.2, and BE-4.1 through BE-4.3) and municipal Strategies BF-1, BF-2, and BF-3, and subsequent actions (BF-1.1 through BF-1.3, BF-2.1 through BF-2.3, and BF-3.1 through BF-3.4). For example, implementation of Action BE-1.1 recommends adoption of a new ordinance that requires all new nonresidential construction and major renovations to meet energy efficiency standards, compliant with State and Federal law and based on cost-effectiveness studies, stakeholder input, and CEC approval. Action BE-1.2 requires developing a comprehensive building energy retrofit plan to transition existing residential and nonresidential buildings to all-electric.

To update the Final SEIR to align with the terminology of the final Climate Compass, the last paragraph on page 3.2-17 that continues to page 3.2-18 of the Draft SEIR is revised as follows:

Original:

The Climate Compass would be consistent with the requirements of the CALGreen Code, which include building energy and water efficiency improvements. The Climate Compass includes strategies and actions that would implement both new and existing building energy efficiency improvements, decarbonize new and existing buildings, and improve energy efficiency and water efficiency. For example, Action BE-1.5 recommends adoption of voluntary CALGreen measures that encourage heat pump installations when air conditioners are replaced in existing single-unit residential, while Action TR-2.1 recommends adoption of a reach code for EV charging to meet CALGreen Tier 1 requirements, require new commercial development to equip parking spaces with EV charging receptacles. Action BF-3.1 proposes developing and adopting a green building policy requiring all new municipal buildings to meet or exceed CALGreen Tier 1 standards, establishing requirements for energy-efficient design, renewable energy integration, water conservation, and sustainable materials use. Through the implementation of these strategies and actions, the Plan would be consistent with the mandatory requirements of the CALGreen Code.

Revised:

The Climate Compass would be consistent with the requirements of the CALGreen Code, which include building energy and water efficiency improvements. The Climate Compass includes strategies and actions that would implement both new and existing building energy efficiency improvements, decarbonize new and existing buildings, and improve energy efficiency and water efficiency. For example, Action BE-1.5 recommends adoption of standards for the conversion of HVAC to heat pump systems with reduced GHG emissions that is compliant with State and Federal law. While Action TR-2.1 recommends adoption of an ordinance requiring higher EV charging infrastructure for new commercial development. Action BF-3.1 proposes developing and adopting a green building policy requiring all new municipal buildings to meet or exceed CALGreen Tier 1 standards, establishing requirements for energy-efficient design, renewable energy integration, water conservation, and

sustainable materials use. Through the implementation of these strategies and actions, the Plan would be consistent with the mandatory requirements of the CALGreen Code.

3.5 REVISIONS TO CHAPTER 4, CUMULATIVE IMPACTS

To update the Final SEIR to align with the projected GHG emissions reductions of the final Climate Compass, the first full paragraph under heading "Proposed Climate Compass Cumulative Analysis", on page 4-5 of the Draft SEIR is revised as follows:

Original:

Impact 4-2: Cumulative Impacts Related to Greenhouse Gas Emissions and Climate Change

As discussed in greater detail in Section 3.2, "Greenhouse Gas Emissions And Climate Change," of this Draft SEIR, adoption and implementation of the Climate Compass would achieve the City's 2030 and 2045 GHG emission reduction goals consistent with statewide GHG reduction goals as identified in the 2022 Scoping Plan set by AB 1279. Despite minor construction and operational GHG emissions occurring with the implementation of the Climate Compass, the Plan would reduce overall GHG emissions from sources in the community and City operations. Notably, the majority of GHG reductions would be achieved through the community GHG reduction strategies and their associated actions detailed in Table 2-14 of Chapter 2, "Project Description." The total estimated community GHG emissions reductions from all quantified strategies and actions would be 385,968 $MTCO_2e$ in 2030 and 356,645 $MTCO_2e$ in 2045. While constituting a smaller portion of the City's GHG reductions, the total estimated City operations GHG emissions reductions from all quantified strategies and action would be 2,501 $MTCO_2e$ in 2030 and 2,450 $MTCO_2e$ in 2045. In addition, while implementation of the Plan would achieve the City's GHG emissions reduction targets for 2030 and 2045, the Plan also provides the City with a surplus of GHG emissions reductions. Overall, GHG emissions would be substantially reduced in 2030 and 2045 compared to the "no local action" (NLA) scenario (i.e., implementation of the General Plan without implementation of the strategies and actions included in the Climate Compass).

Revised:

Impact 4-2: Cumulative Impacts Related to Greenhouse Gas Emissions and Climate Change

As discussed in greater detail in Section 3.2, "Greenhouse Gas Emissions And Climate Change," of this Draft SEIR, adoption and implementation of the Climate Compass would achieve the City's 2030 and 2045 GHG emission reduction goals consistent with statewide GHG reduction goals as identified in the 2022 Scoping Plan set by AB 1279. Despite minor construction and operational GHG emissions occurring with the implementation of the Climate Compass, the Plan would reduce overall GHG emissions from sources in the community and City operations. Notably, the majority of GHG reductions would be achieved through the community GHG reduction strategies and their associated actions detailed in Table 2-14 of Chapter 2, "Project Description." The total estimated community GHG emissions reductions from all quantified strategies and actions would be 380,646 $MTCO_2e$ in 2030 and 333,017 $MTCO_2e$ in 2045. While constituting a smaller portion of the City's GHG reductions, the total estimated City operations GHG emissions reductions from all quantified strategies and action would be 2,501 $MTCO_2e$ in 2030 and 2,450 $MTCO_2e$ in 2045. In addition, while implementation of the Plan would achieve the City's GHG emissions reduction targets for 2030 and 2045, the Plan also provides the City with a surplus of GHG emissions reductions. Overall, GHG emissions would be substantially reduced in 2030 and 2045 compared to the "no local action" (NLA) scenario (i.e., implementation of the General Plan without implementation of the strategies and actions included in the Climate Compass).

3.6 REVISIONS TO CHAPTER 5, ALTERNATIVES

Updates to Chapter 5, "Alternatives," reflect changes to the final Climate Compass that include removing nonresidential construction standards related to energy efficiency and EV charging. None of these changes substantially alter Alternative 2 or the conclusions in the Draft SEIR.

To update the Final SEIR to align with the terminology of the final Climate Compass, the second bullet point under Section 5.4, "Alternatives Selected For Detailed Analysis," on page 5-4 of the Draft SEIR is revised as follows:

Original:

- **Alternative 2: Removal of Reach Code Actions Alternative** assumes the Climate Compass would be adopted with the exclusion of Actions BE-1.1 and TR-2.1, both of which require the City to adopt reach codes by 2026, from the Community GHG Emissions Reduction Strategies and associated actions list. Under this alternative, all strategies and associated actions included for City operations under the Climate Compass would remain the same. Specifically, Actions BE-1.1 and TR-2.1 require the City to adopt reach codes encouraging transition from natural gas powered heating and appliances to electric alternatives for new construction and major renovations in both residential and nonresidential development and for electric vehicle (EV) charging, respectively. The adoption of reach codes are voluntary and must be proven to be cost effective and approved by the California Energy Commission (CEC).

Revised:

- **Alternative 2: Removal of Advanced Building Standards Actions Alternative** assumes the Climate Compass would be adopted with the exclusion of Actions BE-1.1, requiring the City to adopt a nonresidential reach code for energy efficiency standard in 2026, and TR-2.1, requiring the City to adopt higher EV charging infrastructure for new commercial development, from the Community GHG Emissions Reduction Strategies and associated actions list. Under this alternative, all strategies and associated actions included for City operations under the Climate Compass would remain the same. Specifically, Actions BE-1.1 and TR-2.1 require all new nonresidential construction and major renovations to meet energy efficiency standards, compliant with State and Federal law and based on cost-effectiveness studies, stakeholder input, and CEC approval, and require higher EV charging infrastructure for new commercial development, respectively.

To update the Final SEIR to align with the final Climate Compass, the two paragraphs and Table 5-3, "Alternative 2 Community GHG Emissions Reduction Strategies," under Section 5.4.2, "Alternative 2: Removal of Reach Code Action Alternatives," on page 5-9 of the Draft SEIR is revised as follows:

Original:

3.6.1 Alternative 2: Removal of Reach Code Actions Alternative

Alternative 2 would be the same as the proposed Plan but would remove Actions BE-1.1 and TR-2.1 from the Community GHG Emissions Reduction Strategies and associated actions list. All strategies and associated actions included for City operations under the proposed Plan would remain the same under this alternative. Actions BE-1.1 and TR-2.1 require the City to adopt reach codes[1] encouraging transition from natural gas powered heating and appliances to electric alternatives for new construction and major renovations in both residential and nonresidential development and for EV charging, respectively. The adoption of reach codes are voluntary, must be cost effective, and are required to be submitted for approval by the CEC.

[1] A reach code is a local amendment to the California Building Code (CBC). In California, local governments have the authority to adopt amendments to the California Building Standards Code, commonly known as "Title 24" of the California Code of Regulations. These local amendments are often referred to as reach codes because they require performance that exceeds that of the minimum State code. There are two categories of reach codes: 1) Prescriptive Codes, which require one or more specific energy efficiency or renewable energy measures; and 2) Performance Codes, which require buildings to perform more efficiently than Title 24, Part 6 Energy Standards, allowing applicants flexibility in project designs (CECS 2025).

Table 5-3 shows the GHG emissions reductions quantified for Alternative 2's community GHG emissions reduction strategies and associated actions. As shown in the table, the total estimated community GHG emissions reductions from all strategies quantified would be 335,558 $MTCO_2e$ in 2030 and 356,645 $MTCO_2e$ in 2045. As such, without the development and adoption of building electrification and EV charging reach codes (i.e., Actions BE-1.1 and TR-2.1), the City would still be able to meet its 2030 and 2045 GHG reduction targets.

Table 5-3 Alternative 2 Community GHG Emissions Reduction Strategies

Strategy Number	Strategy Name	GHG Reductions ($MTCO_2e$) 2030	GHG Reductions ($MTCO_2e$) 2045
Buildings and Energy (BE)			
BE-1	Electrify and Decarbonize Buildings	28,957	199,967
BE-2	Increase Density and Expand Affordable Housing	Included in TR-1	Included in TR-1
BE-3	Increase Local Renewable Energy Use and Storage	280,438	0
BE-4	Reduce Energy Consumption and Energy Burden	Included in BE-1	Included in BE-1
	Buildings and Energy Subtotal	**307,396**	**199,967**
Transportation (TR)			
TR-1	Decrease Vehicle Miles Traveled	4,911	5,281
TR-2	Increase Zero-Emission Vehicle Adoption	8,630	110,886
TR-3	Reduce Off-Road Transportation Emissions	9,542	10,856
	Transportation Subtotal	**23,082**	**127,023**
Resilience and Adaptation (RA)			
RA-1	Improve Climate and Emergency Preparedness	N/A	N/A
RA-2	Build Capacity for Current and Future Flooding	N/A	N/A
RA-3	Protect Populations from Wildfire Smoke	N/A	N/A
RA-4	Reduce Exposure to Extreme Heat and Mitigate the Urban Heat Island Effect	Included in RA-5	Included in RA-5
RA-5	Expand the Urban Tree Canopy	185	880
RA-6	Expand Nature-Based Solutions	NA	NA
	Resilience and Adaptation Subtotal	**185**	**880**
Resource Consumption (RC)			
RC-1	Increase Organic Waste Diversion	4,755	28,775
RC-2	Promote a Circular Economy	Included in RC-1	Included in RC-1
RC-3	Reduce Water Use	140	0
	Resource Consumption Subtotal	**4,895**	**28,775**
Green Economy (GE)			
GE-1	Support Green Businesses	N/A	N/A
	Green Economy Subtotal	**N/A**	**N/A**

Strategy Number	Strategy Name	GHG Reductions ($MTCO_2e$) 2030	GHG Reductions ($MTCO_2e$) 2045
Climate Action Commitment (CA)			
CA-1	Conduct Meaningful Community Outreach	N/A	N/A
CA-2	Provide Community Education on Public Health and Wellbeing	N/A	N/A
CA-3	Provide Community Education on Water Efficiency	N/A	N/A
CA-4	Measure and Manage Climate Action Progress	N/A	N/A
	Climate Action Commitment Subtotal	**N/A**	**N/A**
	Total Reductions from Strategies	**335,558**	**356,645**
	Reduction Needed to Meet Target	*327,615*	*322,498*
	Target Met?	Yes	Yes
	Remaining Gap to Target	-7,943	-34,148

Notes: Total may not sum exactly due to independent rounding. GHG = greenhouse gas; $MTCO_2e$ = metric tons of carbon dioxide equivalent; N/A = not applicable.

Source: City of Elk Grove 2025.

Revised:

3.6.2 Alternative 2: Removal of Advanced Building Standards Actions Alternative

Alternative 2 would be the same as the proposed Plan but would remove Actions BE-1.1 and TR-2.1 from the Community GHG Emissions Reduction Strategies and associated actions list. All strategies and associated actions included for City operations under the proposed Plan would remain the same under this alternative. Actions BE-1.1 and TR-2.1 require the City to adopt a nonresidential reach code for energy efficiency standard in 2026, and a higher EV charging infrastructure requirement for new commercial development. Specifically, Actions BE-1.1 and TR-2.1 require all new nonresidential construction and major renovations to meet energy efficiency standards, compliant with State and Federal law and based on cost-effectiveness studies, stakeholder input, and CEC approval, and require higher EV charging infrastructure for new commercial development, respectively.

Table 5-3 shows the GHG emissions reductions quantified for Alternative 2's community GHG emissions reduction strategies and associated actions. As shown in the table, the total estimated community GHG emissions reductions from all strategies quantified would be 336,414 $MTCO_2e$ in 2030 and 330,508 $MTCO_2e$ in 2045. As such, without the development and adoption of building electrification and EV charging building standards (i.e., Actions BE-1.1 and TR-2.1), the City would still be able to meet its 2030 and 2045 GHG reduction targets.

Table 5-3 Alternative 2 Community GHG Emissions Reduction Strategies

Strategy Number	Strategy Name	GHG Reductions ($MTCO_2e$) 2030	GHG Reductions ($MTCO_2e$) 2045
Buildings and Energy (BE)			
BE-1	Electrify and Decarbonize Buildings	28,652	173,830
BE-2	Increase Density and Expand Affordable Housing	Included in TR-1	Included in TR-1
BE-3	Increase Local Renewable Energy Use and Storage	279,599	0

Strategy Number	Strategy Name	GHG Reductions ($MTCO_2e$) 2030	GHG Reductions ($MTCO_2e$) 2045
BE-4	Reduce Energy Consumption and Energy Burden	Included in BE-1	Included in BE-1
	Buildings and Energy Subtotal	**308,251**	**173,830**
Transportation (TR)			
TR-1	Decrease Vehicle Miles Traveled	4,911	5,281
TR-2	Increase Zero-Emission Vehicle Adoption	8,630	110,886
TR-3	Reduce Off-Road Transportation Emissions	9,542	10,856
	Transportation Subtotal	**23,082**	**127,023**
Resilience and Adaptation (RA)			
RA-1	Improve Climate and Emergency Preparedness	N/A	N/A
RA-2	Build Capacity for Current and Future Flooding	N/A	N/A
RA-3	Protect Populations from Wildfire Smoke	N/A	N/A
RA-4	Reduce Exposure to Extreme Heat and Mitigate the Urban Heat Island Effect	Included in RA-5	Included in RA-5
RA-5	Expand the Urban Tree Canopy	185	880
RA-6	Expand Nature-Based Solutions	NA	NA
	Resilience and Adaptation Subtotal	**185**	**880**
Resource Consumption (RC)			
RC-1	Increase Organic Waste Diversion	4,755	28,775
RC-2	Promote a Circular Economy	Included in RC-1	Included in RC-1
RC-3	Reduce Water Use	140	0
	Resource Consumption Subtotal	**4,895**	**28,775**
Green Economy (GE)			
GE-1	Support Green Businesses	N/A	N/A
	Green Economy Subtotal	**N/A**	**N/A**
Climate Action Commitment (CA)			
CA-1	Conduct Meaningful Community Outreach	N/A	N/A
CA-2	Provide Community Education on Public Health and Wellbeing	N/A	N/A
CA-3	Provide Community Education on Water Efficiency	N/A	N/A
CA-4	Measure and Manage Climate Action Progress	N/A	N/A
	Climate Action Commitment Subtotal	**N/A**	**N/A**
	Total Reductions from Strategies	**336,414**	**330,508**
	Reduction Needed to Meet Target	*327,615*	*322,498*
	Target Met?	Yes	Yes
	Remaining Gap to Target	-8,799	-8,010

Notes: Total may not sum exactly due to independent rounding. GHG = greenhouse gas; $MTCO_2e$ = metric tons of carbon dioxide equivalent; N/A = not applicable.

Source: City of Elk Grove 2026.

To update the Final SEIR to align with the terminology of the final Climate Compass, the energy analysis under Alternative 2 on page 5-10 of the Draft SEIR is revised as follows:

Original:

As discussed in Section 3.1, "Energy," the Climate Compass would result in less-than-significant environmental impacts related to wasteful, inefficient, or unnecessary consumption of energy and would not conflict with or obstruct plans for renewable energy or energy efficiency. Alternative 2 would provide similar levels of benefits to energy efficiency and consumption as the Climate Compass, with the exception of the Building and Energy and Transportation focus areas due to the elimination of Actions BE-1.1 and TR-2.1. Because Actions BE-1.1 and TR-2.1 require the City to adopt reach codes encouraging transition from natural gas powered heating and appliances to electric alternatives for new construction and major renovations in both residential and nonresidential development and for EV charging, respectively, the effects of these reach codes are captured in the 2030 GHG emissions reductions since these types of building features are anticipated to become a part of the provisions of the building code over the long-term (i.e., 2045). Under Alternative 2, the removal of the reach code based on the elimination of Action BE-1.1 would result in additional natural gas use in new residential and nonresidential development within the city. The use of new natural gas would increase fossil fuel energy consumption in the City and would not be consistent with the overall goal of the Climate Compass to reduce reliance on fossil fuel energy sources and improve energy efficiency. In addition, under this alternative, the removal of the reach code based on the elimination of Action TR-2.1 would remove the City's ability to increase EV charging infrastructure requirements based on the characteristics of new commercial development above the mandatory provisions of the CALGreen Code. While the elimination of Action TR-2.1 would not necessarily generate additional energy consumption, it would remove the mechanism the City could use to make new development include EV infrastructure above the mandatory provisions of CALGreen Code. Therefore, while Alternative 2 would generally be similar to the Climate Compass, this alternative would have greater impacts on energy than the Climate Compass.

Revised:

As discussed in Section 3.1, "Energy," the Climate Compass would result in less-than-significant environmental impacts related to wasteful, inefficient, or unnecessary consumption of energy and would not conflict with or obstruct plans for renewable energy or energy efficiency. Alternative 2 would provide similar levels of benefits to energy efficiency and consumption as the Climate Compass, with the exception of the Building and Energy and Transportation focus areas due to the elimination of Actions BE-1.1 and TR-2.1. Actions BE-1.1 and TR-2.1 require the City to adopt a nonresidential reach code for energy efficiency standard by 2026, and a higher EV charging infrastructure for new commercial development. Specifically, Actions BE-1.1 and TR-2.1 require all new residential and nonresidential construction and major renovations to meet energy efficiency standards, compliant with State and Federal law and based on cost-effectiveness studies, stakeholder input, and CEC approval and require higher EV charging infrastructure for new commercial development, respectively. As such, the effects of these building standards are captured in the 2030 GHG emissions reductions since these types of building features are anticipated to become a part of the provisions of the building code over the long-term (i.e., 2045). Under Alternative 2, the removal of the building standards based on the elimination of Action BE-1.1 would result in additional natural gas use in new residential and nonresidential development within the city. The use of new natural gas would increase fossil fuel energy consumption in the City and would not be consistent with the overall goal of the Climate Compass to reduce reliance on fossil fuel energy sources and improve energy efficiency. In addition, under this alternative, the removal of the building standards based on the elimination of Action TR-2.1 would remove the City's ability to increase EV charging infrastructure requirements based on the characteristics of new commercial development above the mandatory provisions of the CALGreen Code. While the elimination of Action TR-2.1 would not necessarily generate additional energy consumption, it would remove the mechanism the City could use to make new development include EV infrastructure above the mandatory provisions of CALGreen Code. Therefore, while Alternative 2 would generally be similar to the Climate Compass, this alternative would have greater impacts on energy than the Climate Compass.

To update the Final SEIR to align with the terminology of the final Climate Compass, the GHG emission analysis under Alternative 2 on page 5-11 of the Draft SEIR is revised as follows:

Original:

As discussed in Section 3.2, "Greenhouse Gas Emissions and Climate Change," the Climate Compass would result in less-than-significant environmental impacts related to GHGs and climate change. Under Alternative 2, the removal of Actions BE-1.1 and TR-2.1 would reduce the total estimated community GHG emissions reductions from all strategies quantified in 2030 to 335,558 $MTCO_2e$, compared to 385,968 $MTCO_2e$ under the Climate Compass. Specifically, the total estimated community GHG emissions reductions associated with Strategy BE-1 and associated actions would be reduced to 28,957 $MTCO_2e$ under Alternative 2, compared to 36,436 $MTCO_2e$ under the Climate Compass. The total estimated community GHG emissions reductions associated with Strategy TR-2 and associated actions would be reduced to 8,630 $MTCO_2e$ under Alternative 2, compared to 49,607 $MTCO_2e$ under the Climate Compass. In total, by eliminating Actions BE-1.1 and TR-2.1, Alternative 2 would not provide 50,410 $MTCO_2e$ of GHG emissions reductions for 2030 that is provided under the Climate Compass. While this alternative would still meet the City's 2030 and 2045 GHG reduction targets, Alternative 2 would not provide as large of a buffer for the City to meet its 2030 GHG reduction target (i.e., -7,943 $MTCO_2e$ under Alternative 2 compared to -58,353 $MTCO_2e$ under the Climate Compass for 2030). Estimated community GHG emissions reductions under Alternative 2 would be the same as projected for the Climate Compass in 2045 as the provisions of the reach codes included in Actions BE-1.1 and TR-2.1 are anticipated to become a part of the provisions of the building code over the long-term. Therefore, Alternative 2 would have **greater** impacts on GHG emissions than the Climate Compass.

Revised:

As discussed in Section 3.2, "Greenhouse Gas Emissions and Climate Change," the Climate Compass would result in less-than-significant environmental impacts related to GHGs and climate change. Under Alternative 2, the removal of Actions BE-1.1 and TR-2.1 would reduce the total estimated community GHG emissions reductions from all strategies quantified in 2030 to 336,414 $MTCO_2e$, compared to 380,646 $MTCO_2e$ under the Climate Compass. Specifically, the total estimated community GHG emissions reductions associated with Strategy BE-1 and associated actions would be reduced to 28,652 $MTCO_2e$ under Alternative 2, compared to 30,882 $MTCO_2e$ under the Climate Compass. The total estimated community GHG emissions reductions associated with Strategy TR-2 and associated actions would be reduced to 8,630 $MTCO_2e$ under Alternative 2, compared to 49,607 $MTCO_2e$ under the Climate Compass. In total, by eliminating Actions BE-1.1 and TR-2.1, Alternative 2 would not provide 44,232 $MTCO_2e$ of GHG emissions reductions for 2030 that is provided under the Climate Compass. While this alternative would still meet the City's 2030 and 2045 GHG reduction targets, Alternative 2 would not provide as large of a buffer for the City to meet its 2030 and 2045 GHG reduction target (i.e., -8,799 $MTCO_2e$ in 2030 and -8,010 $MTCO_2e$ in 2045 under Alternative 2 compared to -53,031 $MTCO_2e$ in 2030 and -10,519 $MTCO_2e$ in 2045 under the Climate Compass). Therefore, Alternative 2 would have **greater** impacts on GHG emissions than the Climate Compass.

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4 REFERENCES

City of Elk Grove. 2025 (June). City of Elk Grove Climate Compass Draft Supplemental Environmental Impact Report.

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Appendix A

Notice of Preparation and
Comment Letters

CITY OF ELK GROVE
8401 LAGUNA PALMS WAY • ELK GROVE, CALIFORNIA 95758
TEL: 916.683.7111 • FAX: 916.691.3175 • www.elkgrovecity.org

NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT

DATE:	**December 6, 2024**
TO:	**Responsible and Trustee Agencies, Organizations, and Interested Parties**
LEAD AGENCY:	**City of Elk Grove** **Contact: Carrie Whitlock, Strategic Planning and Innovation Program Manager** **8401 Laguna Palms Way** **Elk Grove, CA 95758**
PROJECT:	**Climate Compass Project**
APPLICANT:	**City of Elk Grove**
COMMENT PERIOD:	**December 6, 2024 to January 15, 2025**

In discharging its duties under Section 15021 of the California Environmental Quality Act (CEQA) Guidelines, the City of Elk Grove (hereinafter "City" or "Elk Grove"), as lead agency, intends to prepare a Supplemental Environmental Impact Report (SEIR) to the General Plan Update Environmental Impact Report (GPU EIR) (SCH No. 2017062058), as updated by the General Plan Amendments and Update to Vehicle Miles Traveled Standards Subsequent EIR (State Clearinghouse No. 2022020463) (hereinafter referred to collectively as the GPU EIR), for the update to its 2019 Climate Action Plan (CAP), referred to now as the Climate Compass (the "Project"). Since the City made the determination that a SEIR would be appropriate based on a preliminary review of the Project, an initial study has not been prepared pursuant with CEQA Guidelines Section 15063(a). In accordance with Section 15082 of the CEQA Guidelines, this Notice of Preparation (NOP) provides a Project Description, location, and the probable environmental effects of implementation of the proposed Project.

The NOP will be circulated for a 30-day public review and comment period, which extends from December 6, 2024 to January 15, 2025. The City is soliciting comments regarding the scope and content of the SEIR as they relate to other agencies' statutory responsibilities in connection with the proposed Project, as well as comments from interested members of the public. The City will rely on responsible and trustee agencies to provide information relevant to the analysis of resources falling within the jurisdiction of such agencies. The City welcomes public input during the review period. If the City has not received either a response or a well-justified request for additional time by a responsible agency or the Governor's Office of Land Use and Climate Innovation (formerly known as the Office of Planning and Research) by the end of the review period, the City may presume that each responsible and trustee agency and the Office of Land Use and Climate Innovation had no response to make (CEQA Guidelines, Section 15082(b)(2)).

Comments may be submitted in writing during the review period and addressed to:

City of Elk Grove
Office of Strategic Planning and Innovation
c/o Carrie Whitlock
8401 Laguna Palms Way
Elk Grove, CA 95758
cwhitlock@elkgrovecity.org

This NOP is also posted at: https://www.elkgrovecity.org/planning/environmental-review

CEQA provides for a lead agency to facilitate one or more scoping meetings, which provide additional opportunity for determining the scope and content of the SEIR. The City will host a scoping meeting on January 9, 2025, from 6 pm at City of Elk Grove, Council Chambers, 8400 Laguna Palms Way, Elk Grove, CA 95758. Information related to the proposed Project, including how to access Project documents and how to participate in the public review process will be provided at the scoping meeting.

PROJECT LOCATION AND SETTING

The Climate Compass is intended to serve as the long-term climate action plan for the City of Elk Grove. The City is approximately 43 square miles and is generally bounded by Interstate 5 (I-5) on the west; Calvine Road and the City of Sacramento on the north; Grant Line Road on the east; and Kammerer Road on the south. State Route (SR) 99 runs north–south, bisecting the City near its center (refer to Figure 1). Existing land uses include a mix of agriculture, residential, nonresidential (commercial, office, and industrial), parks and open space, civic/institutional, public and quasi-public spaces, roadways, and other infrastructure, and vacant land.

PROJECT DESCRIPTION

The City prioritizes climate action in both communitywide and in City operations. In 2013, the City adopted its first CAP as a citywide plan to reduce greenhouse gas (GHG) emissions. The 2013 CAP was updated in 2019 to incorporate state-recommended targets and monitor progress from its previous iteration. The Climate Compass is proposed as an update to the 2019 CAP.

The Climate Compass establishes a roadmap for the City to achieve its GHG emission reduction targets and includes actions and strategies to adapt to anticipated climate-related impacts. The plan intends to enhance the quality of life for all residents, promote equity, and strengthen community resilience in the face of a changing climate. In addition, the Project aligns local efforts with Assembly Bill (AB) 1279, which requires California to achieve net-zero GHG emissions by 2045 and an 85 percent reduction in anthropogenic GHG emissions by 2045.

The Climate Compass is comprised of the following six chapters and appendices:

- Chapter 1, Introduction: this chapter provides an introduction to the Climate Compass as well as to the overall climate action planning process and key methodologies and terms. This chapter also provides on overview of the development of the Climate Compass to date, including summarizing public and agency input, as well as how the plan fits in with the State's larger climate planning efforts.
- Chapter 2, GHG Inventory and Targets: this chapter provides the foundation for the Climate Compass, presenting the City's GHG emissions inventory, emissions forecasts, and the targets for reducing emissions in line with State and local goals.
- Chapter 3, Climate Action Strategies: this chapter addresses the comprehensive strategies and actions the City would implement to reduce GHG emissions across various sectors, such as energy, transportation, land use, and waste management, while also promoting community resilience and adaptation to climate change impacts.
- Chapter 4, City Operations: this chapter focuses on the strategies and actions the City would adopt to reduce GHG emissions from government operations.
- Chapter 5, Implementation and Monitoring: this chapter details the implementation framework for the Climate Compass, including timelines, funding strategies, partnerships, and the monitoring and reporting processes to ensure the plan's success.
- Chapter 6, Work Cited: this chapter provides the sources used in the development of the plan.
- Appendices include more detailed information on GHG emissions inventories and forecasts, strategy quantification, and supporting documents, such as a cost analysis and funding and financing roadmap.

As detailed within Chapter 3, the Climate Compass includes various strategies and actions that aid in mitigating GHG emissions and promote adapting to climate impacts in the community. The strategies are centered around six focus areas and are further supported with specific actions defining activities, programs, policies, community partnerships, or projects the City would implement to achieve GHG mitigation and adaptation goals. The six focus areas and proposed strategies include:

1) Building Energy
   - Strategy BE-1: Electrify and Decarbonize Buildings
   - Strategy BE-2: Increase Density and Expand Affordable Housing
   - Strategy BE-3: Increase Local Renewable Energy Use and Storage
   - Strategy BE-4: Reduce Energy Consumption and Energy Burden
2) Transportation
   - Strategy TR-1: Decrease Vehicle Miles Traveled
   - Strategy TR-2: Increase Zero-Emission Vehicle (ZEV) Adoption
   - Strategy TR-3: Reduce Off-Road Transportation Emissions
3) Resilience and Adaptation
   - Strategy RA-1: Improve Climate and Emergency Preparedness
   - Strategy RA-2: Building Capacity for Current and Future Flooding
   - Strategy RA-3: Protect Populations from Wildfire Smoke
   - Strategy RA-4: Reduce Exposure to Extreme Heat and Mitigate the Urban Heat Island Effect
   - Strategy RA-5: Expand the Tree Canopy
   - Strategy RA-6: Expand Nature-Based Solutions
4) Resource Consumption
   - Strategy RC-1: Increase Organic Waste Diversion
   - Strategy RC-2: Promote Circular Economy
   - Strategy RC-3: Reduce Water Use
5) Green Economy
   - Strategy GE-1: Support Green Businesses
   - Strategy GE-2: Develop a Green Workforce
6) Climate Action Commitment
   - Strategy CA-1: Conduct Meaningful Community Outreach
   - Strategy CA-4: Provide Community Education on Public Health and Wellbeing
   - Strategy CA-5: Provide Community Education on Water Efficiency
   - Strategy CA-6: Identify Metrics for Success

While the strategies and actions included in the Climate Compass are primarily intended to mitigate GHG emissions and promote adaptation, many of them would also result in one or more co-benefits related to community resilience, economic diversity, equity, air pollution reduction, health and wellbeing, infrastructure reliability, and resource preservation.

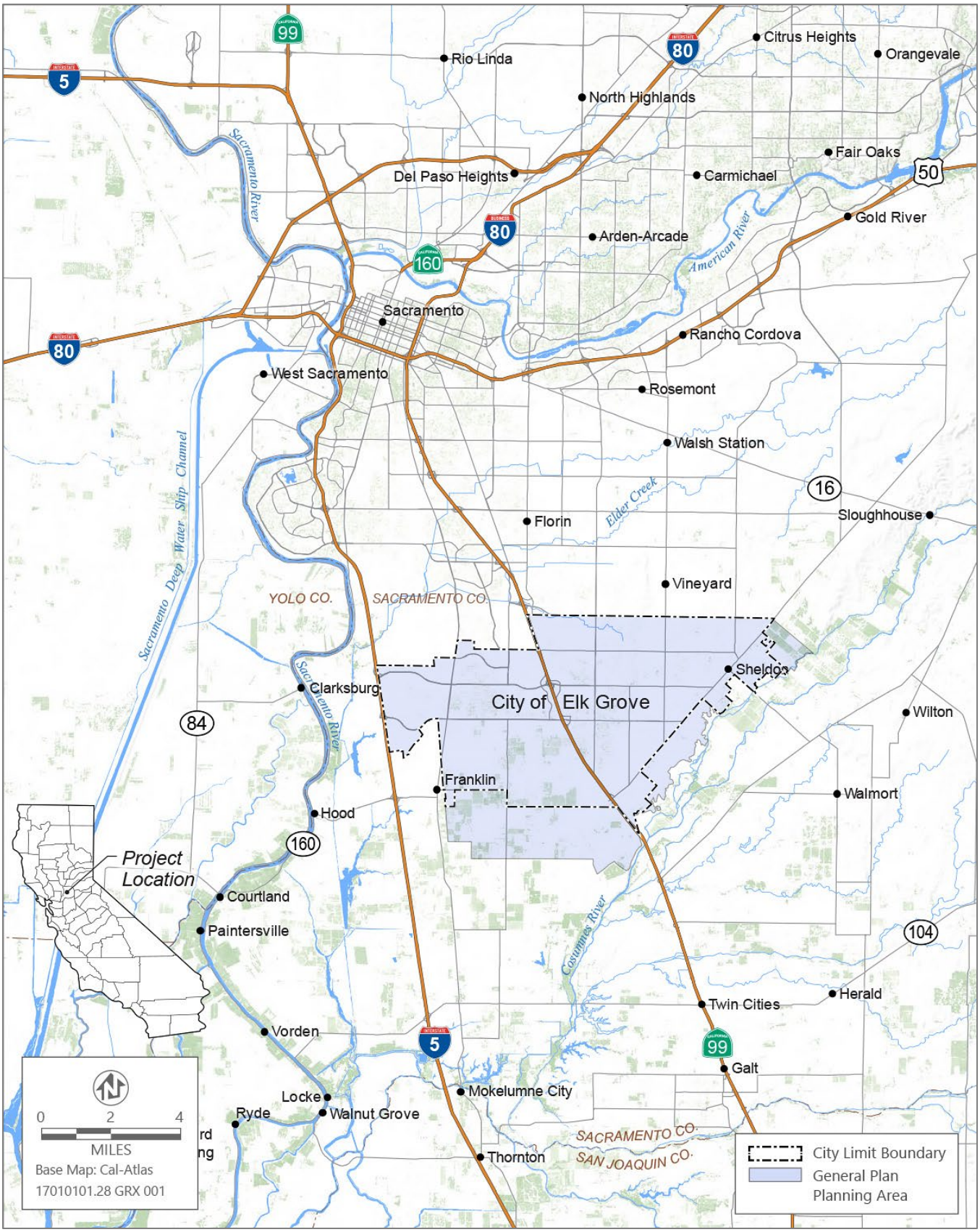
PROBABLE ENVIRONMENTAL EFFECTS

The Draft SEIR to the City's GPU EIR will evaluate whether implementing the proposed Project would potentially result in one or more significant environmental effects. Due to the nature of the proposed Project, the following issue areas will be addressed in detail within the Draft SEIR:

- energy, and
- greenhouse gases emissions and climate change.

In regard to all other environmental issue areas, the Project is not anticipated to result in new significant impacts or substantially increase the severity of significant environmental impacts evaluated in the GPU EIR. For this reason, the following environmental issue areas will be briefly discussed within the Draft SEIR to disclose the rationale why the proposed Project would not result in foreseeable significant environmental impacts from those disclosed in the GPU EIR:

- aesthetics;
- agricultural resources;
- air quality;
- biological resources;
- archaeological, historical, and tribal cultural resources;
- geology, soils, mineral resources, and paleontology;
- hazards and hazardous materials;
- hydrology and water quality;
- noise and vibration;
- population and housing;
- public services and recreation;
- utilities and service systems;
- transportation; and
- wildfire.



Source: adapted by Ascent in 2024.

Figure 1 Project Location

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
North Central Region
1701 Nimbus Road, Suite A
Rancho Cordova, CA 95670-4599
(916) 358-2900
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

January 14, 2025

Carrie Whitlock
Strategic Planning and Innovation Program Manager
City of Elk Grove
Office of Strategic Planning and Innovation
8401 Laguna Palms Way
Elk Grove, CA 95758
cwhitlock@elkgrovecity.org

Subject: CLIMATE COMPASS PROJECT
DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT (DSEIR)
SCH No. 2017062058

Dear Carrie Whitlock:

The California Department of Fish and Wildlife (CDFW) received and reviewed the Notice of Preparation of a Draft Supplemental Environmental Impact Report (DSEIR) from the City of Elk Grove for the Climate Compass Project (Project) in Sacramento County pursuant the California Environmental Quality Act (CEQA) statute and guidelines.[1]

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish, wildlife, plants and their habitats. Likewise, CDFW appreciates the opportunity to provide comments regarding those aspects of the Project that it, by law, may need to exercise its own regulatory authority under the Fish and Game Code (Fish & G. Code).

CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Fish & G. Code, § 1802.). Similarly, for purposes of CEQA, CDFW provides, as available, biological expertise during public agency

1 CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW may also act as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT DESCRIPTION SUMMARY

The Project site is located within the boundaries of the City of Elk Grove (the City) which is generally bounded by Interstate 5 (I-5) on the west; Calvine Road and the City of Sacramento on the north; Grant Line Road on the east; and Kammerer Road on the south. State Route (SR) 99 runs north–south, bisecting the City near its center.

The Project consists of updating the 2019 Climate Action Plan (CAP) to establish a roadmap for the City to achieve its greenhouse gas (GHG) emission reduction targets and includes actions and strategies to adapt to anticipated climate-related impacts. The plan intends to enhance the quality of life for all residents, promote equity, and strengthen community resilience in the face of a changing climate. In addition, the Project aligns local efforts with Assembly Bill (AB) 1279, which requires California to achieve net-zero GHG emissions by 2045 and an 85 percent reduction in anthropogenic GHG emissions by 2045.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations presented below to assist the City in adequately identifying and/or mitigating the Project's significant, or potentially significant, impacts on biological resources. The comments and recommendations are also offered to enable CDFW to adequately review and comment on the proposed Project with respect to impacts on biological resources. CDFW recommends that the forthcoming DSEIR address the following:

Project Description

The Project description should include the whole action as defined in the CEQA Guidelines § 15378. As required by § 15126.6 of the CEQA Guidelines, the DSEIR should include an appropriate range of reasonable and feasible alternatives that would attain most of the basic Project objectives and avoid or minimize significant impacts to resources under CDFW's jurisdiction.

Assessment of Biological Resources

Section 15125(c) of the CEQA Guidelines states that knowledge of the regional setting of a project is critical to the assessment of environmental impacts and that special emphasis should be placed on environmental resources that are rare or unique to the region. To enable CDFW staff to adequately review and comment on the Project, the DSEIR should include a complete assessment of the flora and fauna within and adjacent to the Project footprint, with emphasis on identifying rare, threatened, endangered, and other sensitive species and their associated habitats. CDFW recommends the DSEIR specifically include:

1. A general assessment of all habitat types located within the Project footprint, and a generalized map that identifies the location of each habitat type. CDFW recommends that floristic, alliance- and/or association-based mapping and assessment be completed following, *The Manual of California Vegetation*, second edition (Sawyer 2009). Adjoining habitat areas should also be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.

2. A general biological inventory of the fish, amphibian, reptile, bird, and mammal species that are present or have the potential to be present within each habitat type onsite and within adjacent areas that could be affected by the Project. CDFW recommends that the California Natural Diversity Database (CNDDB), as well as previous studies performed in the area, be consulted to assess the potential presence of sensitive species and habitats. A nine United States Geologic Survey 7.5-minute quadrangle search is recommended to determine what may occur in the region, larger if the Project area extends past one quad (see *Data Use Guidelines* on the CDFW webpage www.wildlife.ca.gov/Data/CNDDB/Maps-and-Data). Please review the webpage for information on how to access the database to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code, in the vicinity of the Project. CDFW recommends that CNDDB Field Survey Forms be completed and submitted to CNDDB to document survey results. Online forms can be obtained and submitted at: https://www.wildlife.ca.gov/Data/CNDDB/Submitting-Data.

   Please note that CDFW's CNDDB is not exhaustive in terms of the data it houses, nor is it an absence database. CDFW recommends that it be used as a starting point in gathering information about the *potential presence* of species within the general area of the Project site. Other sources for identification of species and habitats near or adjacent to the Project area should include, but may not be limited to, State and federal resource agency lists, California Wildlife Habitat Relationship System, California Native Plant Society Inventory, agency contacts, environmental documents for other projects in the vicinity, academics, and professional or scientific organizations.

3. An inventory of rare, threatened, endangered, and other sensitive species potentially located within the Project footprint and within offsite areas with the potential to be affected, including California Species of Special Concern and California Fully Protected Species (Fish & G. Code § § 3511, 4700, 5050, and 5515). Species to be addressed should include all those which meet the CEQA definition (CEQA Guidelines § 15380). The inventory should address seasonal variations in use of the Project area and should not be limited to resident species. CDFW recommends the City rely on survey and monitoring protocols and guidelines available at: www.wildlife.ca.gov/Conservation/Survey-Protocols. Alternative survey protocols may be warranted; justification should be provided to substantiate why an alternative protocol is necessary. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service, where necessary. Some aspects of the Project may warrant periodic updated surveys for certain sensitive taxa, particularly if the Project is proposed to occur over a protracted time frame, or in phases, or if surveys are completed during periods of drought or deluge.

4. Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region (CEQA Guidelines § 15125[c]).

Analysis of Direct, Indirect, and Cumulative Impacts to Biological Resources

The DSEIR should provide a thorough discussion of the Project's potential direct, indirect, and cumulative impacts on biological resources. To ensure that Project impacts on biological resources are fully analyzed, the following information should be included in the DSEIR:

1. The DSEIR should define the threshold of significance for each impact and describe the criteria used to determine whether the impacts are significant (CEQA Guidelines, § 15064, subd. (f)). The DSEIR must demonstrate that the significant environmental impacts of the Project were adequately investigated and discussed, and it must permit the significant effects of the Project to be considered in the full environmental context.

2. A discussion of potential impacts from lighting, noise, human activity, and wildlife-human interactions created by Project activities especially those adjacent to natural areas, exotic and/or invasive species occurrences, and drainages. The DSEIR should address Project-related changes to drainage patterns and water quality within, upstream, and downstream of the Project site, including: volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-Project fate of runoff from the Project site.

3. A discussion of potential indirect Project impacts on biological resources, including resources in areas adjacent to the Project footprint, such as nearby public lands (e.g., National Forests, State Parks, etc.), open space, adjacent

natural habitats, riparian ecosystems, wildlife corridors, and any designated and/or proposed reserve or mitigation lands (e.g., preserved lands associated with a Conservation or Recovery Plan, or other conserved lands).

4. A cumulative effects analysis developed as described under CEQA Guidelines section 15130. The DSEIR should discuss the Project's cumulative impacts on natural resources and determine if that contribution would result in a significant impact. The DSEIR should include a list of present, past, and probable future projects producing related impacts to biological resources or shall include a summary of the projections contained in an adopted local, regional, or statewide plan, that consider conditions contributing to a cumulative effect. The cumulative analysis shall include impact analysis of vegetation and habitat reductions within the area and their potential cumulative effects. Please include all potential direct and indirect Project-related impacts to riparian areas, wetlands, wildlife corridors or wildlife movement areas, aquatic habitats, sensitive species and/or special-status species, open space, and adjacent natural habitats in the cumulative effects analysis.

CDFW supports Project activities that help reduce GHG emissions to reduce climate change, especially if the Project activities avoid or minimize impacts to sensitive biological resources and effectively conserve wetlands, riparian forests, oak woodlands, streams, and other sensitive habitats.

Mitigation Measures for Project Impacts on Biological Resources

The DSEIR should include appropriate and adequate avoidance, minimization, and/or mitigation measures for all direct, indirect, and cumulative impacts that are expected to occur as a result of the Project. CDFW also recommends the environmental documentation provide scientifically supported discussion regarding adequate avoidance, minimization, and/or mitigation measures to address the Project's significant impacts upon fish and wildlife and their habitat. In order for mitigation measures to be effective, they must be specific, enforceable, and feasible actions that will improve environmental conditions. When proposing measures to avoid, minimize, or mitigate impacts, CDFW recommends consideration of the following:

1. *Fully Protected Species*: Several Fully Protected Species (Fish & G. Code § 3511 and 4700) have the potential to occur within or adjacent to the Project area, including, but not limited to: California black rail (*Laterallus jamaicensis coturniculus*), golden eagle (*Aquila chrysaetos*), white-tailed kite (*Elanus leucurus*), ringtail (*Genus Bassariscus*), and wolverine (*Gulo luscus*). Project activities described in the DSEIR should be designed to completely avoid any fully protected species. CDFW recommends that the City include in the analysis how appropriate avoidance, minimization and mitigation measures will reduce indirect impacts to fully protected species.

2. *Species of Special Concern*: Several Species of Special Concern (SSC) have the potential to occur within or adjacent to the Project area, including, but not limited to: western spadefoot (*Spea hammondii*), burrowing owl (*Athene cunicularia*),

western pond turtle (*Emys marmorata*), and loggerhead shrike (*Lanius ludovicianus*). Project activities described in the DSEIR should be designed to avoid any SSC. CDFW recommends the City include in the analysis how appropriate avoidance, minimization and mitigation measures will reduce impacts to SSC.

3. *Sensitive Plant Communities*: CDFW considers sensitive plant communities to be imperiled habitats having both local and regional significance. Plant communities, alliances, and associations with a statewide ranking of S-1, S-2, S-3, and S-4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by querying the CNDDB and are included in *The Manual of California Vegetation* (Sawyer 2009). The DSEIR should include measures to fully avoid and otherwise protect sensitive plant communities from Project-related direct and indirect impacts.

4. *Mitigation*: CDFW considers adverse Project-related impacts to sensitive species and habitats to be significant to both local and regional ecosystems, and the DSEIR should include mitigation measures for adverse Project-related impacts to these resources. Mitigation measures should emphasize avoidance and reduction of Project impacts. For unavoidable impacts, onsite habitat restoration, enhancement, or permanent protection should be evaluated and discussed in detail. If onsite mitigation is not feasible or would not be biologically viable and therefore would not adequately mitigate the loss of biological functions and values, offsite mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed.

   The DSEIR should include measures to perpetually protect the targeted habitat values within mitigation areas from direct and indirect adverse impacts in order to meet mitigation objectives to offset Project-induced qualitative and quantitative losses of biological values. Specific issues that should be addressed include restrictions on access, proposed land dedications, long-term monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.

   The City identified expanding the tree canopy in the 2019 CAP as a sustainability planning strategy which sequesters carbon dioxide from the atmosphere by focusing on habitat preservation, increasing urban forest, and creating air quality improvements through pollutant sequestration. CDFW supports Project activities that provide carbon storage in natural and working lands to mitigate GHG emissions. CDFW recommends that carbon storage involves the usage of native trees and shrubs to restore the natural habitats of special-status species such as riparian forests and oak woodlands. CDFW recognizes potential City's concerns about the increased risk of wildfires from the plantings due to climate change, so CDFW recommends that native fire-resistant species be considered as part of the planting palette suchlike California buckeyes (*Aesculus californica*).

The NOP also discussed preparation for increased flooding resulting from climate change involving building capacity for current and future flooding. CDFW recommends that some of the improvements be focused on improvement of fish habitats. Project activities that benefit fish species, such as restoring degraded channels and floodplains to original form and function, removing natural barriers to increase spawning habitat, and protecting and improving wetland-fed streams that maintain higher summer flows can also create new flood capacity and increase water retention. In addition, restoring and replanting concrete lined channels and bared disturbed areas (around streams) to act as flood protection, improve water quality, and prevent erosion/sedimentation would help deal with climate change effects. CDFW strongly supports these Project activities as they increase stream habitat resiliency as well as provide restored habitat for local native species.

5. *Habitat Revegetation/Restoration Plans*: Plans for restoration and revegetation should be prepared by persons with expertise in the regional ecosystems and native plant restoration techniques. Plans should identify the assumptions used to develop the proposed restoration strategy. Each plan should include the following parameters: (a) the location of restoration sites and assessment of appropriate reference sites; (b) the plant species to be used, sources of local propagules, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) a local seed and cuttings and planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity. Monitoring of restoration areas should extend across a sufficient time frame to ensure that the new habitat is established, self-sustaining, and capable of surviving drought.

   CDFW recommends that local onsite propagules from the Project area and nearby vicinity be collected and used for restoration purposes. Onsite seed collection should be appropriately timed to ensure the viability of the seeds when planted. Onsite vegetation mapping at the alliance and/or association level should be used to develop appropriate restoration goals and local plant palettes. Reference areas should be identified to help guide restoration efforts. Specific restoration plans should be developed for various Project components as appropriate. Restoration objectives should include protecting special habitat elements or re-creating them in areas affected by the Project. Examples may include retention of woody material, logs, snags, rocks, and brush piles. Fish and Game Code sections 1002, 1002.5 and 1003 authorize CDFW to issue permits for the take or possession of plants and wildlife for scientific, educational, and propagation purposes. Please see our website for more information on Scientific Collecting Permits at www.wildlife.ca.gov/Licensing/Scientific-Collecting#53949678-regulations-.

   Another area of restoration mitigation opportunity is invasive plant species

management. Many rare, threatened, and endangered native plants are more susceptible to extinction caused by climate change due principally to small population sizes and limited suitable habitat types. While some animals have the ability to move when conditions become unfavorable, plants are immobile and thus cannot as easily adapt to a quickly changing environment. Climate change may alter plant life stages such as leaf emergence or flowering period which may hinder survival and reproduction. Some studies estimate that endemic plant species' ranges may shift up to 90 miles under intense climate change, but this shift may be a slow process relative to a rapidly changing climate. Furthermore, plants that are restricted to extremely specific habitats are especially at risk because while the climatic environment may shift, the soil and nutrient environment will not. Invasive plant species pose a threat to native plants because invasives tend to do well in the changing conditions that climate change is thought to promote, and those invasives may then out-compete rare plants for vital resources. Invasive species management should aim to conserve and manage large areas of protected habitat for plants, which may rely on dispersal and a variety of habitat gradients and varied microsites to cope with the changing environment. Efforts should focus on reducing the negative effects of non-native invasive plant species like preventing the introduction of these species into the natural habitats of the City, detecting and responding to introductions when they occur, and preventing the spread of invasive plant species that have become established.

6. *Nesting Birds*: Please note that it is the City responsibility to comply with all applicable laws related to nesting birds and birds of prey. Migratory non-game native bird species are protected by international treaty under the federal Migratory Bird Treaty Act (MBTA) of 1918, as amended (16 U.S.C. 703 *et seq.*). CDFW implemented the MBTA by adopting the Fish and Game Code section 3513. Fish and Game Code sections 3503, 3503.5 and 3800 provide additional protection to nongame birds, birds of prey, their nests and eggs. Sections 3503, 3503.5, and 3513 of the Fish and Game Code afford protective measures as follows: section 3503 states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by the Fish and Game Code or any regulation made pursuant thereto; section 3503.5 states that is it unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by the Fish and Game Code or any regulation adopted pursuant thereto; and section 3513 states that it is unlawful to take or possess any migratory nongame bird as designated in the MBTA or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the MBTA.

   Potential habitat for nesting birds and birds of prey is present within the Project area. The Project should disclose all potential activities that may incur a direct or indirect take to nongame nesting birds within the Project footprint and its vicinity. Appropriate avoidance, minimization, and/or mitigation measures to avoid take must be included in the DSEIR.

CDFW recommends the DSEIR include specific avoidance and minimization measures to ensure that impacts to nesting birds or their nests do not occur. Project-specific avoidance and minimization measures may include, but not be limited to: Project phasing and timing, monitoring of Project-related noise (where applicable), sound walls, and buffers, where appropriate. The DSEIR should also include specific avoidance and minimization measures that will be implemented should a nest be located within the Project site. In addition to larger, protocol level survey efforts (e.g., Swainson's hawk surveys) and scientific assessments, CDFW recommends a final preconstruction survey be required no more than three (3) days prior to vegetation clearing or ground disturbance activities, as instances of nesting could be missed if surveys are conducted earlier.

7. *Moving out of Harm's Way*: The Project is anticipated to result in the clearing of natural habitats that support native species. To avoid direct mortality, the City should state in the DSEIR a requirement for a qualified biologist with the proper handling permits, which will be retained to be onsite prior to and during all ground- and habitat-disturbing activities. Furthermore, the DSEIR should describe that the qualified biologist with the proper permits may move out of harm's way special-status species or other wildlife of low or limited mobility that would otherwise be injured or killed from Project-related activities, as needed. The DSEIR should also describe qualified biologist qualifications and authorities to stop work to prevent direct mortality of special-status species. CDFW recommends fish and wildlife species be allowed to move out of harm's way on their own volition, if possible, and to assist their relocation as a last resort. It should be noted that the temporary relocation of onsite wildlife does not constitute effective mitigation for habitat loss.

8. *Translocation of Species*: CDFW generally does not support the use of relocation, salvage, and/or transplantation as the sole mitigation for impacts to rare, threatened, or endangered species as these efforts are generally experimental in nature and largely unsuccessful. Therefore, the DSEIR should describe additional mitigation measures utilizing habitat restoration, conservation, and/or preservation, in addition to avoidance and minimization measures, if it is determined that there may be impacts to rare, threatened, or endangered species.

The DSEIR should incorporate mitigation performance standards that would ensure that impacts are reduced to a less-than-significant level. Mitigation measures proposed in the DSEIR should be made a condition of approval of the Project. Please note that obtaining a permit from CDFW by itself with no other mitigation proposal may constitute mitigation deferral. CEQA Guidelines section 15126.4, subdivision (a)(1)(B) states that formulation of mitigation measures should not be deferred until some future time. To avoid deferring mitigation in this way, the DSEIR should describe avoidance, minimization and mitigation measures that would be implemented should the impact occur.

California Endangered Species Act

CDFW is responsible for ensuring appropriate conservation of fish and wildlife resources including threatened, endangered, and/or candidate plant and animal species, pursuant to CESA. CDFW recommends that a CESA Incidental Take Permit (ITP) be obtained if the Project has the potential to result in "take" (Fish & G. Code § 86 defines "take" as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill") of State-listed CESA species, either through construction or over the life of the Project.

State-listed species with the potential to occur in the area include, but are not limited to: bald eagle (*Haliaeetus leucocephalus*), bank swallow (*Riparia riparia*), Boggs Lake hedge-hyssop (*Gratiola heterosepala*), California tiger salamander - central California DPS (*Ambystoma californiense pop. 1*), giant garter snake (*Thamnophis gigas*), least Bell's vireo (*Vireo bellii pusillus*), Mason's lilaeopsis (*Lilaeopsis masonii*), Sacramento Orcutt grass (*Orcuttia viscida*), slender Orcutt grass (*Orcuttia tenuis*), Swainson's hawk (*Buteo swainsoni*), tricolored blackbird (*Agelaius tricolor*), and western yellow-billed cuckoo (*Coccyzus americanus occidentalis*). Candidate state-listed species with the potential to occur in the area includes burrowing owl (*Athene cunicularia*) and Crotch's bumble bee (*Bombus crotchii*).

The DSEIR should disclose the potential of the Project to take State-listed species and how the impacts will be avoided, minimized, and mitigated. Please note that mitigation measures that are adequate to reduce impacts to a less-than significant level to meet CEQA requirements may not be enough for the issuance of an ITP. To facilitate the issuance of an ITP, if applicable, CDFW recommends the DSEIR include measures to minimize and fully mitigate the impacts to any State-listed species the Project has potential to take. CDFW encourages early consultation with staff to determine appropriate measures to facilitate future permitting processes and to engage with the U.S. Fish and Wildlife Service and/or National Marine Fisheries Service to coordinate specific measures if both State and federally listed species may be present within the Project vicinity.

Native Plant Protection Act

The Native Plant Protection Act (Fish & G. Code §1900 *et seq*.) prohibits the take or possession of State-listed rare and endangered plants, including any part or product thereof, unless authorized by CDFW or in certain limited circumstances. Take of State-listed rare and/or endangered plants due to Project activities may only be permitted through an ITP or other authorization issued by CDFW pursuant to California Code of Regulations, Title 14, section 786.9 subdivision (b).

Lake and Streambed Alteration Program

The DSEIR should generally identify all perennial, intermittent, and ephemeral rivers, streams, lakes, other hydrologically connected aquatic features, and any associated biological resources/habitats present within the entire Project footprint (including utilities, access and staging areas). The environmental document should analyze all potential temporary, permanent, direct, indirect and/or cumulative impacts to the above-

mentioned features and associated biological resources/habitats that may occur because of the Project. If it is determined the Project will result in significant impacts to these resources the DSEIR shall propose appropriate avoidance, minimization and/or mitigation measures to reduce impacts to a less-than-significant level.

Section 1602 of the Fish and Game Code requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following:

1. Substantially divert or obstruct the natural flow of any river, stream or lake;

2. Substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or

3. Deposit debris, waste or other materials where it may pass into any river, stream or lake.

Please note that "any river, stream or lake" includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year-round). This includes ephemeral streams and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a body of water.

If upon review of an entity's notification, CDFW determines that the Project activities may substantially adversely affect an existing fish or wildlife resource, a Lake and Streambed Alteration (LSA) Agreement will be issued which will include reasonable measures necessary to protect the resource. CDFW's issuance of an LSA Agreement is a "project" subject to CEQA (see Pub. Resources Code 21065). To facilitate issuance of an LSA Agreement, if one is necessary, the DSEIR should fully identify the potential impacts to the lake, stream, or riparian resources, and provide adequate avoidance, mitigation, and monitoring and reporting commitments. Early consultation with CDFW is recommended, since modification of the Project may avoid or reduce impacts on fish and wildlife resources. All LSA Notification types must be submitted online through CDFW's Environmental Permit Information Management System (EPIMS). For more information about EPIMS, please visit https://wildlife.ca.gov/Conservation/Environmental-Review/EPIMS. More information about LSA Notifications, paper forms and fees may be found at https://www.wildlife.ca.gov/Conservation/Environmental-Review/LSA.

Please note that other agencies may use specific methods and definitions to determine impacts to areas subject to their authorities. These methods and definitions often do not include all needed information for CDFW to determine the extent of fish and wildlife resources affected by activities subject to Notification under Fish and Game Code section 1602. Therefore, CDFW does not recommend relying solely on methods developed specifically for delineating areas subject to other agencies' jurisdiction (such as United States Army Corps of Engineers) when mapping lakes, streams, wetlands, floodplains, riparian areas, etc. in preparation for submitting a Notification of an LSA.

CDFW relies on the lead agency environmental document analysis when acting as a responsible agency issuing an LSA Agreement. CDFW recommends lead agencies coordinate with us as early as possible, since potential modification of the proposed Project may avoid or reduce impacts to fish and wildlife resources and expedite the Project approval process.

The following information will be required for the processing of an LSA Notification and CDFW recommends incorporating this information into any forthcoming CEQA document(s) to avoid subsequent documentation and Project delays:

1. Mapping and quantification of lakes, streams, and associated fish and wildlife habitat (e.g., riparian habitat, freshwater wetlands, etc.) that will be temporarily and/or permanently impacted by the Project, including impacts from access and staging areas. Please include an estimate of impact to each habitat type.

2. Discussion of specific avoidance, minimization, and mitigation measures to reduce Project impacts to fish and wildlife resources to a less-than-significant level. Please refer to section 15370 of the CEQA Guidelines.

Based on review of Project materials, aerial photography and observation of the site from public roadways, the Project site supports streams (Elk Grove/Laguna Creek, Deer Creek, Franklin Creek, and their tributaries), lakes, and their associated tributaries and riparian habitat. CDFW recommends the DSEIR fully identify the Project's potential impacts to the stream and/or its associated vegetation and wetlands.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database, which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special-status species and natural communities detected during Project surveys to CNDDB. The CNNDB field survey form can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Submitting-Data. The completed form can be submitted online or mailed electronically to CNDDB at the following email address: CNDDB@wildlife.ca.gov.

FILING FEES

The Project, as proposed, would have an effect on fish and wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the City and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

Pursuant to Public Resources Code sections 21092 and 21092.2, CDFW requests written notification of proposed actions and pending decisions regarding the Project. Written notifications shall be directed to: California Department of Fish and Wildlife North Central Region, 1701 Nimbus Road, Rancho Cordova, CA 95670 or emailed to R2CEQA@wildlife.ca.gov.

CDFW appreciates the opportunity to comment on the Notice of Preparation of the DSEIR for the Climate Compass Project and recommends that the City address CDFW's comments and concerns in the forthcoming DSEIR. CDFW personnel are available for consultation regarding biological resources and strategies to minimize impacts.

If you have any questions regarding the comments provided in this letter, or wish to schedule a meeting and/or site visit, please contact Harvey Tran, Senior Environmental Scientist (Specialist) at (916) 358-4035 or harvey.tran@wildlife.ca.gov.

Sincerely,

Tanya Sheya
Environmental Program Manager

ec: Dylan Wood, Senior Environmental Scientist (Supervisory)
Harvey Tran, Senior Environmental Scientist (Specialist)
California Department of Fish and Wildlife

Office of Planning and Research, State Clearinghouse, Sacramento

REFERENCES

Sawyer, J. O., T. Keeler-Wolf, and J. M. Evens. 2009. A Manual of California Vegetation, 2nd ed. California Native Plant Society Press, Sacramento, California. http://vegetation.cnps.org/

14 January 2025

Carrie Whitlock
City of Elk Grove
8401 Laguna Palms Way
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cwhitlock@elkgrovecity.org

COMMENTS TO REQUEST FOR REVIEW FOR THE NOTICE OF PREPARATION FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT, CLIMATE COMPASS PROJECT, SCH#2017062058, SACRAMENTO COUNTY

Pursuant to the State Clearinghouse's 6 December 2024 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Notice of Preparation for the Draft Environmental Impact Report* for the Climate Compass Project, located in Sacramento County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

I. Regulatory Setting

Basin Plan

The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by

the State Water Resources Control Board (State Water Board), Office of Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues. For more information on the Water Quality Control Plan for the Sacramento and San Joaquin River Basins, please visit our website: http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/

Antidegradation Considerations

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Implementation Policy is available on page 74 at: https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_201805.pdf

In part it states:

Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.

This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

II. Permitting Requirements

Construction Storm Water General Permit

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit), Construction General Permit Order No. 2009-0009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). For more information on the Construction General Permit, visit the State Water Resources Control Board website at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml

Phase I and II Municipal Separate Storm Sewer System (MS4) Permits[1]
The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at:
http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml

Industrial Storm Water General Permit
Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 2014-0057-DWQ. For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml

Clean Water Act Section 404 Permit
If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACE). If a Section 404 permit is required by the USACE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements. If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACE at (916) 557-5250.

[1] Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.

Clean Water Act Section 401 Permit – Water Quality Certification

If an USACE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications. For more information on the Water Quality Certification, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/water_issues/water_quality_certification/

Waste Discharge Requirements – Discharges to Waters of the State

If USACE determines that only non-jurisdictional waters of the State (i.e., "non-federal" waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation. For more information on the Waste Discharges to Surface Water NPDES Program and WDR processes, visit the Central Valley Water Board website at:https://www.waterboards.ca.gov/centralvalley/water_issues/waste_to_surface_water/

Projects involving excavation or fill activities impacting less than 0.2 acre or 400 linear feet of non-jurisdictional waters of the state and projects involving dredging activities impacting less than 50 cubic yards of non-jurisdictional waters of the state may be eligible for coverage under the State Water Resources Control Board Water Quality Order No. 2004-0004-DWQ (General Order 2004-0004). For more information on the General Order 2004-0004, visit the State Water Resources Control Board website at: https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf

Dewatering Permit

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Threat General Order) 2003-0003 or the Central Valley Water Board's Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Threat Waiver) R5-2018-0085. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf

For more information regarding the Low Threat Waiver and the application process, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2018-0085.pdf

Limited Threat General NPDES Permit

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Limited Threat Discharges to Surface Water* (Limited Threat General Order). A complete Notice of Intent must be submitted to the Central Valley Water Board to obtain coverage under the Limited Threat General Order. For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01.pdf

NPDES Permit

If the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit. For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/help/permit/

If you have questions regarding these comments, please contact me at (916) 464-4684 or Peter.Minkel2@waterboards.ca.gov.

Peter G. Minkel
Engineering Geologist

cc: State Clearinghouse unit, Governor's Office of Planning and Research, Sacramento

SACRAMENTO METROPOLITAN
AIR QUALITY
MANAGEMENT DISTRICT

January 15, 2025

Carrie Whitlock, Strategic Planning and Innovation Program Manager
City of Elk Grove
8401 Laguna Palms Way
Elk Grove, CA 95758
cwhitlock@elkgrovecity.org

Subject: Notice of Preparation of a Supplemental Environmental Impact Report for the Elk Grove Climate Compass

Dear Ms. Whitlock:

Thank you for routing the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Elk Grove Climate Action Plan (CAP) to the Sacramento Metropolitan Air Quality Management District (Sac Metro Air District) for review. The City is preparing a Supplemental Environmental Impact Report (SEIR) to the General Plan Update EIR for the update to the 2019 CAP, now known as the Climate Compass. The Climate Compass is timely and provides an opportunity for the City to accelerate its greenhouse gas (GHG) emissions reduction efforts. For the first time, global temperatures in 2024 exceeded 1.5 degrees Celsius above pre-industrial levels – a limit set by the 2015 Paris Agreement to bolster the global response to the threat of climate change.[1] Moreover, the last 10 years have been the hottest on record, and the Intergovernmental Panel on Climate Change projects more intense and frequent climate and weather extremes from global warming of 1.5 degrees Celsius above pre-industrial levels. This warming is continuing to cause drastic long-term changes that are affecting Californians all over the state. It is critical for the City to mitigate its GHG emissions and Sac Metro Air District intends to review the prepared SEIR for the Climate Compass with this frame of reference. Please accept the following comments which aim to strengthen the Climate Compass, maximize carbon sequestration, and increase the City's GHG reductions.

Building Energy

- Building energy represents 38 percent of the City's communitywide emissions and is the second largest emissions sector in the 2021 GHG inventory.
    - For Strategy BE-1: Electrify and Decarbonize Buildings, we recommend that the City analyze including requirements for cooking appliances, space heating, and water heating appliances as a pathway to unlocking full electrification. Natural gas infrastructure releases harmful pollutants directly into the home exposing residents to levels of pollution that in some cases are higher than the outdoor ambient air quality

[1] World Meteorological Organization, WMO Confirms 2024 as Warmest Year on Record at About 1.55°C Above Pre-industrial Level, January 10, 2025, https://wmo.int/media/news/wmo-confirms-2024-warmest-year-record-about-155degc-above-pre-industrial-level

standards. Additional air emission reductions could be achieved through the transition to induction cooktops which improve indoor air quality. We recommend that the City explore all feasible options to eliminate natural gas infrastructure in residential and commercial buildings to improve public health and increase emissions reduction.

- Sac Metro Air District suggests that the City focus on electrifying its New Growth Areas at an accelerated rate by requiring new construction to be pre-wired for full electrification. California's 2022 Scoping Plan for Achieving Carbon Neutrality relies on local governments to rapidly electrify development to address GHG emissions associated with the built environment. In addition to the Scoping Plan calling for electrification as a method of achieving statewide climate goals, by not electrifying New Growth Areas, the City would be inconsistent with the Scoping Plan. Additionally, all-electric development is a cost-effective way to meet building electrification goals as new all-electric construction typically results in energy savings for building owners and residents.

- For Strategy BE-3: Increase Local Renewable Energy Use and Storage, the City should analyze requiring the addition of solar photovoltaic canopies over new parking lots as a new design standard. Combining shade with electric vehicle (EV) charging infrastructure increases EV charging efficiency and reduces battery degradation. In addition to providing a renewable source of energy for EV charging, solar photovoltaic shade structures over parking lots are a heat mitigation strategy since less heat is absorbed by the pavement and the parked vehicles. The shade that is provided can also reduce the evaporation of volatile organic compounds from the fuel tanks of conventional cars and reduce the amount of energy that is spent on air conditioning within the vehicle.[2]

Transportation

- On-road transportation represents the largest emissions sector in the City's 2021 GHG inventory.
  - Strategy TR-1: Decrease Vehicle Miles Traveled (VMT) would improve walkability and pedestrian access to public transit. Sac Metro Air District recommends that the City investigate the addition of a new measure that installs pedestrian-friendly infrastructure throughout Elk Grove to support active transportation. Studies show that higher temperatures increase VMT and GHGs as travelers forgo active transportation in favor of driving. In Fresno, CA, transit ridership decreased as temperatures increased, with some potential riders avoiding travel or switching to single-occupancy vehicle use.[3] Sac Metro Air District recommends incorporating infrastructure for heat mitigation such as tree shading, solar canopies, shade structures, and the installation of cool pavements and cool walls at transit stops to improve rider comfort, safety, and accessibility. As pedestrians walk, bike, or skate to public transit stations, a pedestrian-friendly active modes measure that creates safe and welcoming environments for active transportation would bolster their use of transit services and reduce the reliance on single-occupancy vehicles.

[2] Sac Metro Air District, CivicWell, Capital Region Urban Heat Island Mitigation Plan, 2019, https://www.airquality.org/LandUseTransportation/Documents/UHI%20Mitigation%20Plan.pdf
[3] Sac Metro Air District, CivicWell, Capital Region Urban Heat Island Mitigation Project Summary Report, 2020, https://www.airquality.org/LandUseTransportation/Documents/UHI%20Project%20Summary%20Report.pdf

- The City could further reduce communitywide VMT and GHG emissions by incorporating the "Land Use Improvements" measure from Sacramento's Capital Region Climate Priorities Plan (CRCPP)[4] into the Climate Compass. This measure reduces the dependency on single-occupancy vehicle use by increasing residential density through infill housing and mixed-use development. Living near jobs, schools, supermarkets, and medical care facilities decreases travel distances and results in fewer or shorter vehicle trips.
- As Elk Grove expands its city limits, a continued focus on smart growth would allow it to deepen GHG reductions and reach its climate goals within its New Growth Areas. Smart growth is the use of development strategies that preserve community health, the surrounding natural environment, air and water quality, and other resources by reusing developed land, designing compact and walkable neighborhoods, preserving open space, supporting community involvement in design, and providing multiple transportation options. Smart growth policies can reduce VMT and emissions from passenger vehicles as key destinations are sited near public transit and are within walking and biking distance from residences. Smart growth also has the added benefit of reducing the urban heat island effect in cities.

Resilience and Adaptation

- Sac Metro Air District's Urban Heat Island Project[5] modeled urban heat islands in the Sacramento region and evaluated various strategies to combat the effects of heat on urban populations. Along with increasing tree canopy, the project found that strategies such as installing cool roofs and cool pavements deployed at the local and regional scale provide effective heat mitigation for neighborhoods impacted by urban heat islands. By increasing the albedo/solar reflectance of existing surfaces using high albedo materials like sealants and coatings in combination with increased vegetation cover, neighborhoods can experience cooler temperatures.[6] Urban heat islands can cause substantial adverse effects on humans, both directly and indirectly, but by mitigating the impacts of urban heat islands, the City can create a more livable and sustainable urban environment for its residents. The following recommendations would boost the efficacy of Strategy RA-4: Reduce Exposure to Extreme Heat and Mitigate the Urban Heat Island Effect.
    - Extreme heat is deadlier than other natural hazards making it crucial for local jurisdictions to provide heat mitigation for new and existing infrastructure in areas impacted by urban heat islands. The City should encourage cool roof adoption by exploring the implementation of a local ordinance that requires the installation of roofs with a solar reflectance index (SRI) of either 78 for low-rise or high-rise residential buildings with a roof slope of ≤ 2:12, or an SRI of 20 for low-rise or high-rise residential

[4] Sac Metro Air District, Capital Region Climate Priorities Plan, March 2024, https://www.airquality.org/residents/climate-change/climate-pollution-reduction-grants
[5] Sac Metro Air District, Urban Heat Island Project, 2020 https://www.airquality.org/businesses/climate-change/urban-heat-island
[6] Sac Metro Air District, Atmospheric Modeling for the Development of a Regional Heat Pollution Reduction Plan – Technical Project Report, February 2020, https://www.airquality.org/LandUseTransportation/Documents/Altostratus_Final_Report.pdf

buildings with a roof slope of > 2:12. If adopted at scale, cool roofs can reduce peak energy demand and increase grid stability.

- In areas with low albedo, installing cool pavements or covering traditional pavements with sealants that have an albedo between 0.30 or 0.35 can reduce the amount of heat that the pavement absorbs and reflects. The City should consider requiring road repair and new roadway improvement projects to install cool pavements with an albedo between 0.30 to 0.35 to avoid glare for drivers and pedestrians. To assist with community planning, the City could look to the CRCPP and the 2024 CAPCOA Handbook which includes the "Install Cool Pavement" measure.[7] The implementation of this quantified measure could reduce energy use for cooling in surrounding buildings thus reducing the GHG emissions associated with electricity consumption. Tracking the replacement of traditional pavement with highly reflective pavement could be a key performance indicator for this measure.

- Under the communitywide business-as-usual scenario and the communitywide legislative-adjusted business-as-usual scenario for the GHG emissions forecast, agricultural emissions are expected to decrease from 2021 levels through 2050 as the agricultural production acreage within city limits declines over the coming decades.
  - Although the City has plans to continue to develop agricultural lands, it should consider the benefits of keeping agricultural lands viable using sustainable farming practices that can sequester more carbon than developed land. The City could implement a carbon stock program that assesses the amount of carbon that could be sequestered through the year 2050 on these preserved agricultural lands. A carbon stock program that monitors the amount of carbon that is sequestered and how much has historically been sequestered would justify the preservation of agricultural lands. Furthermore, incentivizing sustainable farming practices in rural areas of the city could reduce VMT by keeping crops local. The addition of the Carbon Sequestration Program/Carbon Farming measure from the CRCPP could reduce GHG emissions through the conservation, maintenance, and restoration of natural resources on ranches and farmland. Sac Metro Air District recommends integrating these suggestions into a broadened Strategy RA-6: Expand Nature-Based Solutions in the Climate Compass. If the City continues to develop agricultural lands, it should consider doing so through smart growth that increases the density of all-electric housing near public transit and other sustainable transportation options to reduce GHG emissions.

Sac Metro Air District looks forward to reviewing the draft SEIR and the Climate Compass. We hope that our recommendations assist the City in its development of a robust plan to mitigate GHG emissions and address the current and future impacts of climate change in the Sacramento region.

If you have questions regarding these comments, please contact Brianna Moland, Climate Coordinator, at bmoland@airquality.org or (916) 317-0821.

[7] California Air Pollution Control Officers Association, 2024 Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity, 2024, https://www.airquality.org/ClimateChange/Documents/2024%20Handbook%20Update_AB434.pdf

Sincerely,

Brianna Moland

Brianna Moland
Climate Coordinator, CEQA and Land Use Section
Sac Metro Air District

cc: Paul Philley, AICP, Program Manager
Carolyn Tran, Air Quality Planner/Analyst

CALIFORNIA
NATIVE PLANT SOCIETY
2707 K Street, Suite 1, Sacramento, CA 95816-5130 (916) 447.2677 www.cnps.org

Protecting
California's native
flora since 1965

January 15, 2025

City of Elk Grove
Attn: Carrie Whitlock
8401 Laguna Palms Way
Elk Grove, CA, 95758

Submitted via email to: cwhitlock@elkgrovecity.org

Re: Sacramento Valley Chapter of the California Native Plant Society Comments on Climate Compass Project

Dear Ms. Whitlock,

Thank you for the opportunity to comment on the Climate Compass Project. The following comments are submitted on behalf of the California Native Plant Society (CNPS), Sacramento Chapter. CNPS's mission is to protect California's native plant heritage and preserve it for future generations through the application of science, research, education, and conservation. The Sacramento Valley Chapter focuses on these issues within the Greater Sacramento Valley.

We applaud the City of Elk Grove for creating a roadmap for reducing greenhouse gas emissions and increasing resilience within the City of Elk Grove through the development of the Climate Compass Project. It is our understanding that the Climate Compass Project will address Resilience and Adaptation, and Resource Consumption in addition to traditional topics such as Transportation and Green Energy.

Building Capacity for Current and Future Flooding

We strongly support efforts that integrate increased floodwater storage capacity and conveyance with natural systems. Wetlands, healthy connected floodplains, and wide riparian corridors provide space for fragile habitats which host numerous native plant and animal species while functioning as green infrastructure which can help protect built infrastructure during storm events. Floodwater storage basins are an underutilized opportunity to support seasonal wetland species while creating greenspace while simultaneously serving as infrastructure.

Expand the Tree Canopy

We strongly encourage the use of native tree species to expand the canopy with the City. Native tree species are adapted to the local climate and do not require supplemental irrigation once established. Use of the correct species and cultivars can create a win-win by creating space for native birds and insects while establishing a robust and aesthetically pleasing canopy for the

community. The Sacramento Valley Chapter could assist in recommending appropriate species that would be successful based on the planting location and maintenance level.

Expand Nature-Based Solutions

We commend the City of Elk Grove on seeking to expand the use of Nature Based Solutions. Nature Based Solutions have the potential to create more resilient infrastructure that can recover function following storm damage resulting in reduced costs in the long term. Natural and Nature Based Solutions also create opportunities for recreation and habitat opportunities for native plants.

Reduce Water Use

California native plants can be an effective option for waterwise landscaping while remaining aesthetically pleasing and helping to re-establish the heritage presence lost to development. With the right combination of native plants, landscaping that uses little to no supplemental irrigation can be achieved which can result in substantial cost savings in the long-term. The Sacramento Valley Chapter has a wealth of information and experience designing and maintaining native plant landscapes, including in urban environments.

In conclusion, the Sacramento Valley Chapter is offering to collaborate with the City of Elk Grove where possible and remain engaged in this project by providing local knowledge to incorporate California native plants as fully as possible. Thank you for the opportunity to comment on this project and please contact me if you have any questions.

Sincerely,

Lorena Guerrero
Chair, Conservation Committee
California Native Plants Society, Sacramento Valley Chapter
volunteersvcnps@gmail.com

From: Katie McCammon <katie.mccammon@350sacramento.org>
Sent: Thursday, January 16, 2025 2:16 PM
To: Carrie Whitlock <cwhitlock@elkgrovecity.org>
Cc: Rosie Yacoub <rayacoub@yahoo.com>; Oscar Balaguer <oscarbal@hotmail.com>
Subject: Re: NOP comments

[EXTERNAL EMAIL]

Hi Carrie,

Apologies, it has been a back and forth on this and I misunderstood what Rosie was providing. It sounds like she shared comments on "strategy" but the only comment from 350 Sac CAP team at this point is *concern that the CAP will exclude land use and transportation from the final document*. Our team strongly supports including these items in the final CAP.

This is all I have from our team at this time. I am still in the learning stages of CAP and won't try to make any technical comments on behalf of the organization.

We look forward to talking more on the EG CAP as it develops!

Thank you,
Katie

On Wed, Jan 15, 2025 at 3:27 PM Carrie Whitlock <cwhitlock@elkgrovecity.org> wrote:

> Hi Katie,
>
> I just wanted to reach out and see if we should still expect some NOP comments today from you all.
>
> Thanks,
> CW

Carrie Whitlock, AICP (she/her)

Strategic Planning & Innovation Program Manager / Strategic Planning & Innovation
City Manager's Office

City of Elk Grove
8401 Laguna Palms Way, Elk Grove, CA 95758
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From: Eugene Lee <eugeneenergy22@gmail.com>
Sent: Wednesday, January 15, 2025 10:09 PM
To: Carrie Whitlock <cwhitlock@elkgrovecity.org>
Subject: NOP Comments

[EXTERNAL EMAIL]

To: Carrie Whitlock

Thank you for the opportunity to provide comments to the NOP.

As an Elk Grove resident, I strongly support the Climate Compass. Elk Grove is an active growing community requiring intentional actions to mitigate climate change effects in our city.

I support the proposed Compass chapters and the six focus areas. Specifically,

Building Energy
I support Idea Res-New-1, Idea Res-Ex-1, Idea Non-Res-New-1, and Idea NonRes-Ex-1 as proposed in the Agenda Item No. 9.1 - Staff Report dated August 14, 2024.

Transportation
I support the Concept Strategies 1-3 and Actions as presented in the Agenda Item No. 9.3 - Staff Report dated August 28, 2024.

Resilience and Adaptation
With respect to climate and emergency preparedness, I recommend the specific strategies reflect sufficient communication infrastructure and methods to address the needs and safety of all residents, particularly the aged, low-income, and non-English speaking. I also recommend actions to mitigate negative effects on low-income and disadvantaged neighborhoods.

Resource Consumption and Green Economy
I strongly support the proposed strategies.

Climate Action Commitment
I recommend that the strategy incorporate a commitment to promote climate justice and equity. The Compass should benefit all residents and businesses regardless of location and economic condition.

Thank you for your consideration.

--
Eugene Lee
Commissioner
Sacramento Environmental Commission

Appendix B

Textual Modifications to Chapter 7 of City's General Plan

Proposed Open Space Element Amendments

This appendix presents specific textual modification changes made to Chapter 7, "Community and Resource Protection," of the City of Elk Grove General Plan. The following textual modifications ensure internal consistency between the General Plan and the updated GHG emissions inventory and projections included in the Climate Compass. The changes are presented in the order in which they appear in the original Chapter 7 and are identified by the corresponding page number. The revised text is presented afterwards.

Textual Modification to Chapter 7, "Community and Resource Protection"

To update Chapter 7 of the General Plan to align with the final Climate Compass, the discussion of greenhouse gas emissions and Table 7-1 on pages 7-20 and 7-21 are revised as follows:

Original:

Greenhouse Gas Emissions

Greenhouse gas (GHG) emissions contribute to local air quality concerns. The Global Warming Solutions Act (Assembly Bill [AB] 32) requires that California significantly reduce its emissions of GHGs in order to minimize the impacts of climate change. To ensure the City is taking steps to meet its fair share of the State's GHG reduction goals, Elk Grove has completed an inventory of GHG emissions and adopted a Climate Action Plan (CAP). Table 7-1 categorizes Citywide GHG emissions by sector as of 2013 (listed as metric tons of carbon dioxide equivalents, or MTCO2e) the most recent year for which an inventory has been completed.

The CAP and the General Plan outline GHG emissions reduction targets for future years that are designed to reduce emissions within the Elk Grove community in a manner consistent with State regulations and guidelines. Because GHGs are generated by a variety of sources, a varied approach to reducing GHG emissions is most effective. The CAP inventory of GHG emissions indicate that major emissions sources in the city include residential and commercial/industrial building energy use on-road vehicles, off-road vehicles, solid waste, and wastewater. The CAP establishes that emissions in the baseline year, 2013, were 5.6 MTCO2e per capita and community equaled 918,790 MTCO2e.

TABLE 7-1:
2013 CITYWIDE EMISSIONS BY SECTOR

Sector	2005 MTCO2e	Percent of Total	2013 MTCO2e	Percent of Total
Residential built environment	225,190	28%	231,400	25%
Nonresidential built environment	103,170	13%	129,860	14%
Transportation (on- road vehicles)	348,370	43%	430,340	47%
Off-road equipment	83,800	10%	93,340	10%

Solid waste	36,380	5%	26,260	3%
Water and wastewater	3,070	<1%	6,562	<1%
Agriculture	5,450	<1%	1,030	<1%
Total	808,410	100%	918,790	100%

Source: Compiled by Ascent Environmental 2018

If all community activities were to continue under a business-as-usual scenario with no reduction measures they would reach 1,523,936 MTCO2e by 2030, a 65 percent increase over 2013. However, the CAP estimates that with measures taken as a result of the State's legislative actions emission would reduce those emissions to 4.5 MTCO2e per capita by 2030 and 4.3 MTCO2e per capita by 2050, resulting in community emissions of 888,509 and 978,881 respectively for those years. Measures outlined in the General Plan and CAP would further reduce the community's emissions to 3.8 MTCO2e per capita by 2030 and 3.0 MTCO2e per capita by 2050. These reductions are projected results of twenty-one reduction measures contained in the CAP in three broad policy areas: built environment, resource conservation, and transportation. The greatest percentage of these reductions, 56%, would be achieved through efficiency and renewable energy improvements to the built environment, while resource conservation measures would result in a 12% reduction, and transportation alternatives and congestion management measures would result in a 32% reduction.

Revised:

Greenhouse Gas Emissions

Greenhouse gas (GHG) emissions contribute to local air quality concerns. The California Climate Crisis Act (Assembly Bill [AB] 1279) requires California to achieve net-zero GHGs emissions and an 85 percent reduction in anthropogenic GHG emissions by 2045. To ensure the City is taking steps to meet its fair share of the State's GHG reduction goals, Elk Grove has completed an inventory of GHG emissions and adopted a Climate Action Plan (CAP), titled the Climate Compass. Table 7-1 categorizes Citywide GHG emissions by sector as of 2021 (listed as metric tons of carbon dioxide equivalents, or MTCO2e) the most recent year for which an inventory has been completed.

The CAP and the General Plan outline GHG emissions reduction targets for future years that are designed to reduce emissions within the Elk Grove community in a manner consistent with State regulations and guidelines. Because GHGs are generated by a variety of sources, a varied approach to reducing GHG emissions is most effective. The CAP inventory of GHG emissions indicate that major emissions sources in the city include residential and commercial/industrial building energy use and, on-road vehicles, with smaller emission sources from off-road vehicles, solid waste, and wastewater. The CAP establishes that emissions in the baseline year, 2021, were 5.8 MTCO2e per capita and community equaled 1,039,181 MTCO2e.

TABLE 7-1:
2021 CITYWIDE EMISSIONS BY SECTOR

Sector	2005 MTCO2e	Percent of Total	2013 MTCO2e	Percent of Total	2021 MTCO2e	Percent of Total
Residential built environment	225,190	28%	231,400	25%	271,900	26%
Nonresidential built environment	103,170	13%	129,860	14%	126,465	12%

Transportation (on-road vehicles)	348,370	43%	430,340	47%	586,220	56%
Off-road equipment	83,800	10%	93,340	10%	18,341	2%
Solid waste	36,380	5%	26,260	3%	20,222	2%
Water and wastewater	3,070	<1%	6,562	<1%	5,759	<1%
Agriculture	5,450	<1%	1,030	<1%	10,275	1%
Total	808,410	100%	918,790	100%	1,039,181	100%

Source: Compiled by Ascent Environmental 2023

If all community activities were to continue under a business-as-usual scenario with no reduction measures they would reach 1,326,277 MTCO2e by 2030, a 28 percent increase over 2021. However, the CAP estimates that with measures taken as a result of the State's legislative actions emission would reduce those emissions to 4.2~~5~~ MTCO2e per capita by 2030 and 1.5 MTCO2e per capita by 2045, resulting in community emissions of 966,427 and 483,474 respectively for those years. Measures outlined in the General Plan and CAP would further reduce the community's emissions to ~~3~~2.8 MTCO2e per capita by 2030 and ~~3.0~~0.5 MTCO2e per capita by 2045~~50~~. These reductions are projected results of twenty-one strategies contained in the CAP in six broad policy areas: built and energy, transportation, resilience and adaptation, resource consumption, green economy, and climate action commitment. The greatest percentage of these reductions, ~~56~~82% in 2030 and 56% in 2045, would be achieved through efficiency and renewable energy improvements to the built environment, while strategies would result in a 17% reduction in 2030 and a 36% reduction in 2045. Other strategies account for less than two percent of GHG reductions in 2030 and less than ten percent in 2045.

To update Chapter 7 of the General Plan to align with the final Climate Compass, the text of Policy NR-5-1 has been updated with the GHG projections and targets of the Climate Compass on pages 7-36 as follows:

Original:

Policy NR-5-1: By 2030, reduce per capita emissions greenhouse gas emissions to 4.1 MTCO2e. By 2050, reduce per capita greenhouse gas emissions 1.4 MTCO2e to meet the State's 2050 greenhouse gas emissions reduction goals.

Revised:

Policy NR-5-1: By 2030, reduce per capita emissions greenhouse gas emissions to 3.8 MTCO2e. By 2045, reduce per capita greenhouse gas emissions 0.5 MTCO2e to meet the State's 2045 greenhouse gas emissions reduction goals.

To update Chapter 7 of the General Plan to align with the final Climate Compass, the text of Standard-6-2.a on page 7-37 has been modified as follows:

Original:

Standard-6-2.a: Design new municipal facilities to meet at a minimum the baseline Leadership in Energy and Environmental Design (LEED) certification criteria.

Revised:

Standard-6-2.a: Design new municipal facilities as all-electric and retrofit existing buildings to be fully electric with equipment upgrades or replacement.

To update Chapter 7 of the General Plan to align with the final Climate Compass, the text of Standard SD-2-1.a on page 7-39 has been modified as follows:

Original:

Standard SD-2-1.a: Require all new municipal developments to exceed State Title 24 Energy Efficiency Standards by 15 percent, to the extent such efficiencies are possible.

Revised:

Standard SD-2-1.a: Design new municipal facilities to meet CALGreen Tier 1 standards.