

CEQA Findings of Fact for the  
City of Elk Grove Climate Compass Supplemental EIR

April 2026



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# 1 INTRODUCTION

The City of Elk Grove (City), as lead agency, prepared a subsequent environmental impact report (SEIR) for the proposed Climate Compass (Plan). The proposed 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.

The document consists of the June 2025 Draft SEIR and the April 2026 Final SEIR (State Clearinghouse No. 2017062058) (collectively referred to as the SEIR). The SEIR for the Plan presents an assessment of the reasonably foreseeable and potentially significant adverse environmental effects that may occur from implementation of the Plan beyond what was evaluated in the General Plan Update EIR (General Plan EIR) (State Clearinghouse No. 2017062058), which programmatically evaluated both the General Plan Update (General Plan) and the 2019 CAP Update (2019 CAP) as separate documents. These findings have been prepared in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Section 21000 et seq.) and its implementing guidelines (CEQA Guidelines) (California Code of Regulations [CCR] Title 14, Section 15000 et seq.). The City is the lead agency under CEQA and the City of Elk Grove City Council (City Council) is the decision-making authority for the Plan. The City Council adopts these findings in that capacity.

## 2 PROJECT DESCRIPTION

### 2.1 PROJECT BACKGROUND

In 2023, the City initiated the development of the Plan as an update to its 2019 CAP in order to establish the City's blueprint for achieving its GHG emissions reduction targets as well as aligning strategies and actions with updated regulatory requirements (i.e., AB 1279). Plan development has consisted of preparing a GHG emissions inventory, identifying forecasts and targets, and gathering community input on the city's climate strengths, vulnerabilities, and priorities. After establishing the foundation of the city's GHG forecasts and reduction targets, the City developed and refined draft GHG emission reduction and adaptation strategies and actions with input from City staff and subject matter experts. Throughout the entire development process of the Draft Plan, City staff has engaged the public and stakeholders through workshops, local events, surveys, a climate ambassador program, and the formation of a technical advisory group to gather input and feedback on the components of the Plan. The Draft Plan, which includes the city's GHG emission inventory, forecasts, and reduction targets; the finalized communitywide and City operations climate strategies and actions; and the implementation framework for the Plan, was released for public review concurrently with the Draft SEIR on the City's website at: <https://elkgrove.gov/cap>. For a detailed timeline of the development of the Plan, please refer to Chapter 1, "Introduction," of the Climate Compass.

### 2.2 PROJECT LOCATION

The General Plan established a Planning Area of approximately 31,238 acres (48.8 square miles), which includes all land within the current city limits as well as lands outside the city limits in unincorporated Sacramento County to the south and east that, in the City's judgement, bears relation to its planning efforts (referred to as study areas). Specifically, the city of Elk Grove consists of approximately 27,336 acres (42.7 square miles), while approximately 3,902 acres (6.1 square miles) are located within the study areas. The Planning Area is located in the middle of Sacramento County. 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 Eschinger 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 is intended to serve as the long-term CAP for land uses within the Planning Area.

### 2.3 OVERVIEW

The following provides a brief summary and overview of the Plan. Chapter 2, "Project Description," of the Draft SEIR includes a detailed description of the Plan, including maps and graphics.

The Plan would:

- ▶ 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.

### 2.3.1 Project Characteristics

The Climate Compass contains six chapters and technical appendices, which provide additional details on the topics covered in the Plan. A brief summary of the main components of the Plan is provided below:

- ▶ Chapter 1, Introduction: 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 an overview of the development of the Plan 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: 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: 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: Focuses on the strategies and actions the City would adopt to reduce GHG emissions from City operations.
- ▶ Chapter 5, Implementation and Monitoring: 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: 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.

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, 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 and 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.

## 2.4 DISCRETIONARY APPROVALS

The discretionary actions associated with the approval Climate Compass include the following:

- ▶ Review of the Climate Compass by the Elk Grove Planning Commission;
- ▶ Certification of the SEIR for the Climate Compass by the Elk Grove City Council; and
- ▶ Adoption of the Climate Compass by the Elk Grove City Council.

Subsequent actions by the City to implement the Climate Compass may include the following:

- ▶ Adoption of nonresidential reach codes related to improved energy efficiency standards.
- ▶ Adoption of increased electric vehicle charging standards for new commercial development and fueling stations.
- ▶ Adoption of land use plan and zoning revisions to increase density along major transit corridors.
- ▶ Adoption of a post-disaster recovery and reconstruction ordinance.
- ▶ Adoption of updated tree canopy coverage requirements for new development.
- ▶ Development of a local Transportation Management Agency to provide education on transit and alternative transportation services and programs.

### 3 ENVIRONMENTAL REVIEW PROCESS

In accordance with Section 15082 of the State CEQA Guidelines, the City prepared a Notice of Preparation (NOP) of an SEIR on December 6, 2024. It was submitted to the California State Clearinghouse and distributed to interested and affected federal, state, and local agencies; interested parties; and organizations. The NOP was circulated for 41 days, through January 15, 2025. A public scoping meeting was held on January 9, 2025. Concerns raised in response to the NOP and at the scoping meeting were considered during preparation of the Draft SEIR. The NOP and all comments received on the NOP are presented in Appendix A of the Draft SEIR.

AB 52 (Chapter 532, Statutes 2014) requires public agencies to consult with tribes during the CEQA process. A request was made to the California Native American Heritage Commission for a list of applicable tribes, and a notice to nine tribes was circulated in December 2024. No requests for consultation were received by the City within the 30 calendar-day notification period.

The Draft SEIR includes an analysis of the following issue areas:

- ▶ energy, and
- ▶ greenhouse gas emissions and climate change.

The City published the Draft SEIR for public and agency review on June 27, 2025. A 49-day public review period was provided, ending on August 15, 2025.

Consistent with Section 15202 of the State CEQA Guidelines, the City conducted a public meeting on the Draft SEIR at 6:00 p.m. on July 22, 2025 to provide an overview of the Draft SEIR. During the public review period, the City received comment letters from two agencies, one organization, and two individuals. No comments were received during the public meeting.

Those comments relevant to CEQA were addressed in compliance with the State CEQA Guidelines (Sections 15088, 15132). The Final SEIR was released in April 2026. Public hearings are planned for May and June 2026.

The Final SEIR includes comments received on the Draft SEIR; responses to these comments; and revisions to the Draft SEIR, as necessary, in response to these comments or to amplify or clarify material in the Draft SEIR. The Draft and Final SEIR were made available for public review on the internet at <https://www.elkgrove.gov/planning/environmental-review> and <https://elkgrove.gov/cap>. As discussed in Section 4.5, below, none of the changes to the Draft SEIR, or information added to the Draft SEIR, constitutes "significant new information" requiring recirculation of the Draft SEIR pursuant to PRC Section 21092.1 and State CEQA Guidelines Section 15088.5.

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## 4 GENERAL CEQA FINDINGS

### 4.1 MITIGATION MONITORING AND REPORTING PROGRAM

PRC Section 21081.6(a)(1) requires lead agencies to “adopt a reporting and mitigation monitoring program for the changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment.” A mitigation monitoring and reporting program (MMRP) has not been prepared or adopted for the Plan because no new mitigation measures are required. The original mitigation measures identified and analyzed in the General Plan EIR, as amended by the 2023 Subsequent EIR for the General Plan Amendments and Update of VMT Standards Project (GPAs/VMT Standards Project), and subsequently adopted by the City of Elk Grove City Council remain in effect and will continue to be implemented as part of the General Plan.

### 4.2 CEQA GUIDELINES SECTION 15091 AND 15092 FINDINGS

Based on the foregoing findings and the information contained in the administrative record, the City of Elk Grove City Council has determined that there would be no significant or potentially significant impacts associated with the Plan. Therefore, no mitigation measures are required and there would be no significant and unavoidable impacts. Thus, the City of Elk Grove City Council is not required to adopt a statement of overriding considerations for the Plan.

### 4.3 CITY OF ELK GROVE CITY COUNCIL INDEPENDENT JUDGMENT

The Final SEIR reflects the City of Elk Grove City Council’s independent judgment. The City of Elk Grove City Council has exercised independent judgment in accordance with PRC Section 21082.1(c)(3) in retaining its own environmental consultant in the preparation of the SEIR, as well as reviewing, analyzing, and revising material prepared by the consultant.

Having received, reviewed, and considered the information in the Final SEIR, as well as any and all other information in the record, the City of Elk Grove City Council hereby makes findings pursuant to and in accordance with PRC Sections 21081, 21081.5, and 21081.6.

### 4.4 NATURE OF FINDINGS

Any findings made by the City of Elk Grove City Council shall be deemed made, regardless of where it appears in this document. All of the language included in this document constitutes findings by the City of Elk Grove City Council, whether or not any particular sentence or clause includes a statement to that effect. The City of Elk Grove City Council intends that these findings be considered as an integrated whole and, whether or not any part of these findings fail to cross-reference or incorporate by reference any other part of these findings, that any finding required or committed to be made by the City of Elk Grove City Council with respect to any particular subject matter of the Final SEIR, shall be deemed to be made if it appears in any portion of these findings.

### 4.5 RELIANCE ON RECORD

Each and all of the findings and determinations contained herein are based on substantial evidence, both oral and written, contained in the administrative record relating to the Plan.

## 4.5.1 Record of Proceedings

In accordance with PRC Section 21167.6(e), the record of proceedings for the City of Elk Grove City Council's decision on the Plan includes the following documents:

- ▶ The NOP for the Project and all other public notices issued in conjunction with the Project;
- ▶ All comments submitted by agencies or members of the public during the comment period on the NOP;
- ▶ The Draft SEIR for the Plan and all appendices;
- ▶ All comments submitted by agencies or members of the public during the comment period on the Draft SEIR;
- ▶ The Final SEIR for the Plan, including comments received on the Draft SEIR, responses to those comments, and appendices;
- ▶ Documents cited or referenced in the Draft SEIR and Final SEIR;
- ▶ All findings and resolutions adopted by the City Council in connection with the Plan and all documents cited or referred to therein;
- ▶ All reports, studies, memoranda, maps, staff reports, or other planning documents relating to the Plan prepared in compliance with the requirements of CEQA and with respect to the City Council's action on the Plan;
- ▶ All documents submitted by other public agencies or members of the public in connection with the Plan, up through the close of the final public hearing;
- ▶ Any minutes and/or verbatim transcripts of all information sessions, public meetings, and public hearings held in connection with the Plan;
- ▶ Any documentary or other evidence submitted at such information sessions, public meetings, and public hearings;
- ▶ Any and all resolutions adopted by the City of Elk Grove regarding the Plan, and all staff reports, analyses, and summaries related to the adoption of those resolutions;
- ▶ Matters of common knowledge, including, but not limited to federal, state, and local laws and regulations;
- ▶ Any documents expressly cited in these findings and any documents incorporated by reference, in addition to those cited above;
- ▶ Any other written materials relevant to the City of Elk Grove City Council's compliance with CEQA or its decision on the merits of the Plan, including any documents or portions thereof, that were released for public review, relied upon in the environmental documents prepared for the Plan, or included in the City of Elk Grove City Council non-privileged retained files for the SEIR or Plan;
- ▶ Any other materials required for the record of proceedings by PRC Section 21167.6(e); and
- ▶ The Notice of Determination.

The City of Elk Grove City Council intends that only those documents relating to the Plan and its compliance with CEQA and prepared, owned, used, or retained by the City of Elk Grove and listed above shall comprise the administrative record for the Plan. Only that evidence was presented to, considered by, and ultimately before the City of Elk Grove City Council prior to reviewing and reaching its decision on the SEIR and Plan.

## 4.5.2 Custodian of Records

The custodian of the documents or other material that constitute the record of proceedings upon which the City of Elk Grove City Council's decision is based is identified as follows:

City of Elk Grove  
 City Clerk  
 8401 Laguna Palms Way  
 Elk Grove, California 95758

## 4.5.3 Recirculation Not Required

CEQA Guidelines Section 15088.5 provides the criteria that a lead agency is to consider when deciding whether it is required to recirculate an EIR. Recirculation is required when "significant new information" is added to the EIR after public notice of the availability of a Draft EIR is given, but before certification. (CEQA Guidelines, Section 15088.5[a].) "Significant new information," as defined in State CEQA Guidelines Section 15088.5(a), means information added to an EIR that changes the EIR 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."

An example of significant new information provided by the State CEQA Guidelines is a disclosure showing that a "new significant environmental impact would result from the Plan or from a new mitigation measure proposed to be implemented;" that a "substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted to reduce the impact to a level of insignificance;" or that a "feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it." (CEQA Guidelines, Section 15088.5[a][1]-[3].)

Recirculation is not required where "the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR." (CEQA Guidelines, Section 15088.5[b].) Recirculation also is not required simply because new information is added to the EIR — indeed, new information is oftentimes added given CEQA's public/agency comment and response process and CEQA's post-Draft EIR circulation requirement of proposed responses to comments submitted by public agencies.

In this legal context, the City of Elk Grove City Council finds that recirculation of the Draft SEIR prior to certification is not required. In addition to providing responses to comments, the Final SEIR includes revisions to expand upon information presented in the Draft SEIR; explain or enhance the evidentiary basis for the Draft SEIR's findings; update information; and to make clarifications, amplifications, updates, or helpful revisions to the Draft SEIR. The Final SEIR's revisions, clarifications and/or updates do not result in any new significant impacts or increase the severity of a previously identified significant impact.

In sum, the Final SEIR demonstrates that the Plan will not result in any new significant impacts or increase the severity of a significant impact, as compared to the analysis presented in the Draft SEIR. The changes reflected in the Final SEIR also do not indicate that meaningful public review of the Draft SEIR was precluded in the first instance. Accordingly, recirculation of the SEIR is not required as revisions to the SEIR are not significant as defined in Section 15088.5 of the State CEQA Guidelines.

## 4.6 CERTIFICATION OF THE FINAL SEIR

The City of Elk Grove City Council certifies that the Final SEIR has been completed in compliance with CEQA and the State CEQA Guidelines, that the SEIR was presented to the City of Elk Grove City Council, and that the City Council reviewed and considered the information contained therein before approving the Plan, and that the SEIR reflects the independent judgment and analysis of the City of Elk Grove City Council. (CEQA Guidelines Section 15090.)

## 5 FINDINGS REQUIRED UNDER CEQA

This statement of Findings of Fact (Findings) addresses the environmental effects associated with the Plan. These Findings are made pursuant to CEQA under PRC Sections 21081, 21081.5, and 21081.6 and the State CEQA Guidelines Sections 15091 and 15093.

PRC Section 21081 and State CEQA Guidelines Section 15091 require that the lead agency prepare written findings for identified significant impacts, accompanied by a brief explanation for the rationale for each finding. The City is the lead agency responsible for preparation of the EIR in compliance with CEQA and the State CEQA Guidelines. Section 15091 of the State CEQA Guidelines states, in part, that:

- a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:
  - 1) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.
  - 2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
  - 3) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

In accordance with PRC Section 21081 and State CEQA Guidelines Section 15093, whenever significant impacts cannot be mitigated to below a level of significance, the decision-making agency is required to balance, as applicable, the benefits of the proposed project against its unavoidable environmental risks when determining whether to approve the project. If the benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse effects may be considered "acceptable." In that case, the decision-making agency may prepare and adopt a statement of overriding considerations, pursuant to the State CEQA Guidelines.

Section 15093 of the State CEQA Guidelines state that:

- a) CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."
- b) When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the Final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.
- c) If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.

The Final SEIR did not identify any significant or potentially significant impacts associated with the Plan. Therefore, no mitigation measures are required and there would be no significant and unavoidable impacts. Thus, the City of Elk Grove City Council is not required to adopt a statement of overriding considerations for the Plan.

In accordance with CEQA and the State CEQA Guidelines, the City adopts these Findings as part of its certification of the Final SEIR for the Plan. Pursuant to PRC Section 21082.1(c)(3), the City of Elk Grove City Council also finds that the Final SEIR reflects the City Council's independent judgment as the lead agency for the Plan.

## 6 RELATIONSHIP WITH FINDINGS MADE ASSOCIATED WITH CITY OF ELK GROVE GENERAL PLAN UPDATE EIR AND ADOPTION OF THE GENERAL PLAN

The City certified the City of Elk Grove General Plan EIR and adopted the General Plan on February 27, 2019. This action included the adoption of the Elk Grove General Plan Update CEQA Findings and Statement of Overriding Considerations that addressed significant impacts identified in the General Plan EIR. The General Plan was amended in January 2021 for the City of Elk Grove Multi-Sport Complex and Southeast Industrial Annexation Area Project. This action included adoption of the City of Elk Grove Multi-Sport Complex and Southeast Industrial Annexation Area Project CEQA Findings and Statement of Overriding Considerations that addressed new significant impacts not included in the original General Plan EIR. The General Plan was amended a second time in May 2021 with subsequent amendments in December of 2021 for the 2012-2029 Housing Element and Safety Element Update. This action included the adoption of the 2012-2029 Housing Element and Safety Element Update CEQA Findings and Statement of Overriding Considerations that addressed new significant impacts identified in the 2021-2029 Housing Element and Safety Element Update SEIR that were not included in the original General Plan EIR.

Most recently, the General Plan was amended for the GPAs/VMT Standards Project. On December 13, 2023, the City adopted the GPAs/VMT Standards Project and certified the Subsequent EIR to the General Plan EIR (2023 Subsequent EIR) (State Clearinghouse No. 2022020463). The City also adopted the GPAs/VMT Standards Project CEQA Findings and Statement of Overriding Considerations in December 2023.

The GPAs/VMT Standards Project did not include an update to the 2019 CAP, but amended the General Plan that increased residential densities and mixed-use opportunities. As identified in the 2023 Subsequent EIR, this change in development intensity and other associated to the General Plan results in improved VMT limits by land use designation as well as reduced per capita GHG emissions in 2040 as compared to what is identified in the 2019 CAP for 2050. This updated version of the General Plan is the foundational land use plan used for the Climate Compass.

The Final SEIR identified that 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.

The City Council readopts the Elk Grove General Plan Update CEQA Findings and Statement of Overriding Considerations, Multi-Sport Complex and Southeast Industrial Annexation Area Project CEQA Findings and Statement of Overriding Considerations, 2012-2029 Housing Element and Safety Element Update Findings and Statement of Overriding Considerations, and GPAs/VMT Standards Project CEQA Findings and Statement of Overriding Considerations for impacts where the Final SEIR did not identify any new significant environment effects or a substantial increase in severity of environmental effects disclosed in the General Plan EIR. The Elk Grove General Plan Update CEQA Findings and Statement of Overriding Considerations, Multi-Sport Complex and Southeast Industrial Annexation Area Project CEQA Findings and Statement of Overriding Considerations, 2012-2029 Housing Element and Safety Element Update Findings and Statement of Overriding Considerations, and GPAs/VMT Standards Project CEQA Findings and Statement of Overriding Considerations are incorporated by reference herein by this reference. They are on file and available from the City Clerk under City Council Resolutions 2019-035, 2021-032, 2021-128, and, and 2023-283, respectively.

## 7 FINDINGS REGARDING IMPACTS THAT ARE NOT SIGNIFICANT

This section identifies those impacts where the Final SEIR did not identify any new significant environment effects or a substantial increase in severity of environmental effects disclosed in the General Plan EIR.

### 7.1 SECTION 3.1: ENERGY

#### Impact 3.1-1: Result in Wasteful, Inefficient, or Unnecessary Consumption of Energy, During Project Construction or Operation

The General Plan EIR, as amended by the 2023 Subsequent EIR, concluded that impacts related to the wasteful, inefficient, or unnecessary consumption of energy would be less than significant. Implementation of the Climate Compass includes electrification and decarbonization of buildings and infrastructure, increasing renewable energy use and storage, reducing energy and resource consumption, improving clean and efficient transportation, and strengthening resilience and adaptation measures (e.g., water efficiency and renewable energy measures), which would reduce energy demand and improve energy efficiency beyond existing measures by the City. As such, implementation of the Climate Compass would not result in a new or more severe impact than what was identified in the General Plan EIR, as amended by the 2023 Subsequent EIR. This impact would remain less than significant. (Draft SEIR pages 3.1-7 through 3.1-10)

#### MITIGATION MEASURES

No mitigation is required.

#### FINDING

The City of Elk Grove City Council finds that, based upon substantial evidence in the record, the potential impacts related to the Plan's effects are less than significant, and no mitigation measures are required.

#### Impact 3.1-2: Conflict with or Obstruct a State or Local Plan for Renewable Energy or Energy Efficiency

The General Plan EIR, as amended by the 2023 Subsequent EIR, determined impacts related to conflicting with or obstructing applicable State or local plans for renewable energy and energy efficiency would be less than significant. The Climate Compass has been developed in alignment with applicable State and local plans, policies, and regulations that aim to promote energy efficiency and renewable energy generation. Several strategies and actions of the Climate Compass would directly reduce energy demand from fossil fuels in the building sector within the city through building decarbonization, improved energy efficiency, and increased availability of renewably sourced electricity. Additionally, strategies and actions would deploy additional electric vehicle (EV) charging and reduce VMT by increasing and improving bicycle and pedestrian infrastructure, and transit opportunities. These strategies and actions would reduce the city's dependence on fossil fuel-derived energy, improve energy efficiency, and promote renewable energy usage resulting in consistency with applicable plans, policies, and regulations. As such, implementation of the Climate Compass would not result in a new or more severe impact than what was identified in the General Plan EIR, as amended by the 2023 Subsequent EIR. This impact would remain less than significant. (Draft SEIR pages 3.1-11 and 3.1-12)

#### MITIGATION MEASURES

No mitigation is required.

## FINDING

The City of Elk Grove City Council finds that, based upon substantial evidence in the record, the potential impacts related to the Plan's effects are less than significant, and no mitigation measures are required.

## 7.2 SECTION 3.2: GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

### Impact 3.2-1: Generate GHG Emissions, Either Directly or Indirectly, That May Have a Significant Impact on the Environment

The General Plan EIR determined implementation of the General Plan and the 2019 CAP would result in GHG emissions reductions sufficient to meet the City's GHG reduction targets, which were consistent with the statewide GHG emission reduction targets for 2020 and 2030 as identified in the 2017 Scoping Plan, as established by AB 32 and SB 32. Therefore, impacts were determined to be less than significant.

The 2023 Subsequent EIR determined implementation of the GPAs/VMT Standards Project would exceed emissions targets at a higher rate than anticipated as part of the General Plan and as evaluated in the General Plan EIR. Because the GPAs/VMT Standards Project would introduce development not captured in the inventory prepared for the 2019 CAP (i.e., the GPAs/VMT Standards Project introduces land uses inconsistent with the assumptions of the General Plan), the efficacy of the 2019 CAP measures to sufficiently reduce GHG emissions past 2030 would be speculative. For this reason, the 2023 Subsequent EIR determined that impacts would be more severe than those identified in the General Plan EIR. Because the 2019 CAP did not include the most recent regulations (i.e., AB 1279) and no other mitigation was available to reduce GHG impacts, the 2023 Subsequent EIR determined this impact would be significant and unavoidable.

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. (Draft SEIR pages 3.2-11 through 3.2-16)

## MITIGATION MEASURES

No mitigation is required.

## FINDING

The City of Elk Grove City Council finds that, based upon substantial evidence in the record, the potential impacts related to the Plan's effects are less than significant, and no mitigation measures are required.

## Impact 3.1-2: Conflict With an Applicable Plan, Policy, or Regulation Adopted for the Purpose of Reducing the Emissions of GHGs

The General Plan EIR determined that the General Plan and the 2019 CAP would not meet the long-term adjusted statewide emissions reduction goal of 1.4 metric tons of carbon dioxide equivalent (MTCO<sub>2e</sub>) per capita by 2050 consistent with Executive Order (EO) S-3-05 and the 2017 Scoping Plan, despite the General Plan policies, implementation programs, and 2019 CAP GHG reduction actions to be implemented under the General Plan and 2019 CAP. No additional feasible mitigation was identified beyond compliance with the 2019 CAP and proposed General Plan policies. Therefore, the General Plan EIR concluded that the impacts related to meeting the long-term GHG reduction goal for 2050 would be significant and unavoidable.

The 2023 Subsequent EIR determined that development under the GPAs/VMT Standards Project would extend past the 2019 CAP GHG reduction target year of 2030 into 2040 and beyond. Because the GPAs/VMT Standards Project would facilitate development beyond the 2030 target year and that GHG reduction targets have become more stringent since adoption of the 2019 CAP and certification of the General Plan EIR (i.e., AB 1279), the General Plan and the 2019 CAP would not be sufficient to meet the State's long-term targets beyond 2030. As such, the 2023 Subsequent EIR determined implementation of the GPAs/VMT Standards Project would result in a substantially more severe impact than what was addressed in the General Plan EIR, and impacts would remain significant and unavoidable.

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. (Draft SEIR pages 3.2-16 through 3.2-19)

### MITIGATION MEASURES

No mitigation is required.

### FINDING

The City of Elk Grove City Council finds that, based upon substantial evidence in the record, the potential impacts related to the Plan's effects are less than significant, and no mitigation measures are required.

## 7.3 SECTION 3.3: ENVIRONMENTAL IMPACTS ADEQUATELY ADDRESSED IN GENERAL PLAN AND 2023 SUBSEQUENT EIRS

Based on a review of the information presented in the General Plan EIR, as amended by the 2023 SEIR, the Notice of Preparation, comments received as part of the public scoping process, and additional research and analysis of relevant data during preparation of the Draft SEIR, the following resources previously analyzed in the General Plan EIR, as amended by the 2023 SEIR, were identified as resource areas for which no potentially significant environmental impacts would result from the Plan. Accordingly, these resources were not addressed further in the Final SEIR.

### 7.3.1 Aesthetics

The General Plan EIR, as amended by the 2023 Subsequent EIR, determined implementation of the General Plan and 2019 CAP would result in significant and unavoidable impacts related to degrading existing visual character and the quality of public views as well as creating new sources of light and glare (2023 Subsequent EIR Impacts 3.1-1 and 3.1-2 and Cumulative Impacts 4-2 and 4-3). No significant impacts were identified for impacts to scenic vistas or state scenic highways.

Implementation of the strategies and actions of the Climate Compass would include activities such as the installation of new small-scale facilities, such as EV charging stations, solar photovoltaic or battery storage systems; construction of cool roofs and pavements; retrofitting older infrastructure and facilities with newer, more energy efficient technology; and planting more community trees. These types of facilities would be visible within the community as well as on the roof of buildings but would be similar in size, visual character, use of materials, and form to existing facilities of similar nature, such as existing EV chargers, mechanical equipment, and other facilities and improvements that are associated with urban and rural development. Furthermore, these types of facilities are similar in nature as those described in the 2019 CAP and evaluated within the General Plan EIR, as amended by the 2023 Subsequent EIR.

The Plan includes Strategy BE-2 "Increase Density and Expand Affordable Housing," which calls for the City to increase allowed density and intensity of planned development along the City's major transit corridors as a means to increase residential uses in proximity to non-residential uses and alternative transportation to reduce VMT. However, since the Plan is not growth-inducing, implementation of this strategy would not change the development potential of the Planning Area but rather would redistribute the growth that can already occur under the current land use plan of the General Plan, as amended by the GPAs/VMT Standards Project and evaluated within the 2023 Subsequent EIR. Therefore, the Climate Compass would not result in new features of substantial height, bulk, or massing that would result in substantial long-term damage to visual quality that were not considered in the General EIR or the 2023 Subsequent EIR. For these reasons, 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 aesthetics is warranted. (Draft SEIR page 3-3)

### MITIGATION MEASURES

No mitigation is required.

### FINDING

The City of Elk Grove City Council finds that, based upon substantial evidence in the record, 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 this topic or findings are warranted.

### 7.3.2 Agriculture and Forestry Resources

The General Plan EIR and the 2023 Subsequent EIR, evaluated the conversion of agricultural lands and determined impacts to be significant and unavoidable (Impact 3.11-1). There are no areas in the Planning Area zoned as forest or timberland. The Climate Compass does not include any land use or zoning changes and implementation of the Plan would not result in the conversion of agricultural land to non-agricultural uses. For these reasons, 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 agriculture and forestry resources is warranted. (Draft SEIR page 3-4)

## MITIGATION MEASURES

No mitigation is required.

## FINDING

The City of Elk Grove City Council finds that, based upon substantial evidence in the record, 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 this topic or findings are warranted.

### 7.3.3 Air Quality

The General Plan EIR, as amended by the 2023 Subsequent EIR, determined implementation of the General Plan and 2019 CAP would result in significant and unavoidable impacts related to construction emissions of criteria air pollutants, operational air quality, and exposure of sensitive receptors to toxic air contaminants (TACs) (2023 Subsequent EIR Impacts 3.2-1, 3.2-2, and 3.2-4 and Cumulative Impact 4.3).

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 flexible-path 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. (Draft SEIR page 3-4)

## MITIGATION MEASURES

No mitigation is required.

## FINDING

The City of Elk Grove City Council finds that, based upon substantial evidence in the record, 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 this topic or findings are warranted.

### 7.3.4 Archaeological, Historical, and Tribal Cultural Resources

The General Plan EIR, as amended by the 2023 Subsequent EIR, determined implementation of the General Plan and 2019 CAP would result in less than significant impacts to archaeological, historical, and tribal cultural resources with implementation of adopted General Plan Mitigation Measure MM 5.5.1a and MM 5.5.1b (2023 Subsequent EIR Impacts 3.3-1 through 3.3-4 and Cumulative Impact 4-4).

Implementation of the Climate Compass could have the potential to adversely affect historical resources through construction of energy efficiency improvements and building retrofits (Strategy BF-3, Actions BE-1.2, BF-3.3, BF-3.5, RS-1.3), which could involve minor changes to the exterior (e.g., rooftop solar panels) or interior (e.g., water heating and space heating and cooling systems) of existing buildings. Compliance with adopted General Plan Mitigation Measure MM 5.5.1b would mitigate potentially significant impacts to historical resources to less than significant through retention of the

buildings historic features. In addition, all ground disturbing activities associated with implementation of the Climate Compass would comply with applicable regulations and adopted General Plan Mitigation Measure MM 5.5.1a, which would ensure impacts to archaeological and tribal cultural resources and human remains are less than significant. 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 archaeological, historical, and tribal cultural resources is warranted. (Draft SEIR page 3-4)

## MITIGATION MEASURES

No mitigation is required beyond compliance with existing laws, General Plan Policies, and General Plan Mitigation Measures MM 5.5.1a and MM 5.5.1b.

## FINDING

The City of Elk Grove City Council finds that, based upon substantial evidence in the record, 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 this topic or findings are warranted.

### 7.3.5 Biological Resources

The General Plan EIR, as amended by the 2023 Subsequent EIR, determined impacts to biological resources to be significant and unavoidable (2023 Subsequent EIR Impact 3.11-2).

Implementation of the Climate Compass would result in minor improvements and building retrofits, which could require ground disturbing activities, including minor grading and shallow excavation, within the Planning Area. Construction activities are expected to occur in previously disturbed, developed areas, such as roadways and parking lots that lack natural habitat and where candidate, sensitive, or special-status species or their habitats are not present. Therefore, implementation of the Climate Compass would not cause a substantial adverse direct or indirect effect to special-status species. Because implementation of the Climate Compass would occur in previously disturbed, developed areas, implementation of the Climate Compass would not occur in areas where riparian habitat or other sensitive natural communities, protected wetlands, wildlife corridors, and protected biological resources are present. 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 biological resources is warranted. (Draft SEIR pages 3-4 and 3-5)

## MITIGATION MEASURES

No mitigation is required.

## FINDING

The City of Elk Grove City Council finds that, based upon substantial evidence in the record, 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 this topic or findings are warranted.

### 7.3.6 Geology and Soils

The General Plan EIR, as amended by the 2023 Subsequent EIR, determined impacts to geology and soils, including paleontological resources, would be less than significant with implementation of adopted General Plan Mitigation Measure MM 5.6.5 (2023 Subsequent EIR Impact 3.11-3).

Implementation of the Climate Compass would result in minor improvements and building retrofits, which could require ground disturbing activities, including minor grading and shallow excavation, within the Planning Area. All ground disturbing activities would comply with all applicable regulations related to geology and seismicity standards. Due to the nature of the Plan, the Climate Compass would not introduce new residential uses into the Planning Area and thus, would not increase the risk of geologic hazards on people. Furthermore, due to the shallow excavation depths required to implement the strategies and actions of the Plan, it is unlikely ground disturbing activities would encounter paleontological resources; however, in the event paleontological resources are encountered, implementation of adopted General Plan Mitigation Measure MM 5.6.5, which requires halting grading and construction work within 50 feet of discovered paleontological resources until a qualified paleontologist can evaluate the resource and prepare a recovery plan, would ensure impacts are reduced to less than significant. 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 geology and soils is warranted. (Draft SEIR page 3-5)

### MITIGATION MEASURES

No mitigation is required beyond compliance with existing laws, General Plan Policies, and General Plan Mitigation Measure MM 5.6.5.

### FINDING

The City of Elk Grove City Council finds that, based upon substantial evidence in the record, 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 this topic or findings are warranted.

### 7.3.7 Hazards and Hazardous Materials

The General Plan EIR, as amended by the 2023 Subsequent EIR, determined impacts related to hazards and hazardous materials would be less than significant with implementation of adopted General Plan Mitigation Measures MM 5.5.2, and 3.11-12 through 3.11-14 (2023 Subsequent EIR Impact 3.11-4).

The Climate Compass is not a growth-inducing plan and as such, would not change the density of development evaluated within the General Plan EIR, as amended by the 2023 Subsequent EIR. The Plan would not introduce a new land use that could create hazards and would not increase density of development that could result in an increased transport or use of hazardous materials. Construction and/or operation activities associated with implementation of the Climate Compass could involve the use, handling, transporting, or disposal of hazardous materials, such as activities involving removal of existing pavement; repaving surfaces; and installing landscaping and other amenities. In addition, future activities implemented under the Plan could be located on an identified hazardous waste or materials site. However, compliance with all applicable regulations would ensure impacts associated with hazardous materials would be minimized. In addition, implementation of adopted General Plan Mitigation Measure MM 5.5.2, which requires the preparation of Phase I environmental site assessments for properties within the Planning Area that have not been previously evaluated prior to approval of improvement plans, grading permits, and/or demolition permits, would ensure hazardous materials are properly assessed prior to development activities. For construction and operation activities specifically within the LEA Community Plan Area, Mitigation Measures 3.11-12 through 3.11-14 would require a soil contaminant evaluation with each improvement plan and/or grading plan application; sampling for asbestos prior to

the issuance of demolition permits for existing onsite structures constructed prior to 1979; and sampling of all loose and peeling paint prior to the issuance of demolition permits for existing onsite structures that were constructed prior to 1970. The City would also consult with SMUD to determine whether onsite transformers are to be abandoned, moved, upgraded, etc. prior to approval of improvement plans and/or a grading permit for development of properties that contain transformers. 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 hazards and hazardous materials is warranted. (Draft SEIR pages 3-5 and 3-6)

## MITIGATION MEASURES

No mitigation is required beyond compliance with existing laws, General Plan Policies, and General Plan Mitigation Measures MM 5.5.2 and 3.11-12 through 3.11-14.

## FINDING

The City of Elk Grove City Council finds that, based upon substantial evidence in the record, 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 this topic or findings are warranted.

### 7.3.8 Hydrology and Water Quality

The General Plan EIR, as amended by the 2023 Subsequent EIR, determined impacts related to hydrology and water quality would be less than significant with implementation of General Plan adopted Mitigation Measures 3.11-15 through 3.11-16 (2023 Subsequent EIR Impact 3.11-5).

The Climate Compass measures involving construction activity would require minor grading, excavation, and other ground disturbance associated with removing existing pavement; repaving parking surfaces; and installing solar and battery storage systems, landscaping, street furniture, and other amenities. Ground-disturbing activities, which could, depending on their location, potentially cause soil erosion which in turn can contaminate nearby surface water. However, compliance with State and local water quality regulations designed to control erosion and protect water quality during construction would ensure impacts during construction would be minimized. In addition, the Plan includes strategies and actions that require installation of permeable pavements and hardscapes, which would allow for groundwater percolation and recharge within the Planning Area. Furthermore, the Plan is not growth-inducing and thus would not increase demand on surface and groundwater supplies. 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 hydrology and water quality is warranted. (Draft SEIR page 3-6)

## MITIGATION MEASURES

No mitigation is required beyond compliance with existing laws, General Plan Policies, and General Plan Mitigation Measures MM 3.11-15 through 3.11-16.

## FINDING

The City of Elk Grove City Council finds that, based upon substantial evidence in the record, 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 this topic or findings are warranted.

### 7.3.9 Land Use and Planning

The General Plan EIR, as amended by the 2023 Subsequent EIR, determined impacts related to land use and planning quality would be less than significant (2023 Subsequent EIR Impact 3.11-6).

The Climate Compass does not include any land use or zoning changes and would not change the extent or character of the land use plan from what was evaluated in the General Plan EIR, as amended by the 2023 Subsequent EIR. Because the footprint of development within the Planning Area has not changed from the 2023 Subsequent EIR and the Climate Compass is not a growth-inducing plan, there would be no additional land use and planning impacts as a result of adoption and implementation of the Plan. 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 land use and planning is warranted. (Draft SEIR page 3-6)

#### MITIGATION MEASURES

No mitigation is required.

#### FINDING

The City of Elk Grove City Council finds that, based upon substantial evidence in the record, 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 this topic or findings are warranted.

### 7.3.10 Noise and Vibration

The General Plan EIR, as amended by the 2023 Subsequent EIR, determined impacts related to increased traffic noise would be significant and unavoidable (2023 Subsequent EIR Impact 3.6-2 and Cumulative Impacts 4-7 and 4-8).

Construction and operational noise sources generated by activities associated with the implementation of the Climate Compass would be relatively minimal due to their mechanical nature (e.g., EV charging stations, HVAC retrofits, solar and battery storage systems, etc.). Construction and operational noise levels generated by activities associated with the implementation of the Climate Compass would be within the levels evaluated within the General Plan EIR, as amended by the 2023 Subsequent EIR. Implementation of the Plan would not increase traffic noise as some strategies and actions redirect existing trucks and modes of alternative transportation in more sustainable manners. In addition, the Plan requires the City to reduce VMT community-wide and in City operations, which would help to reduce traffic noise. 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 noise and vibration is warranted. (Draft SEIR pages 3-6 and 3-7)

#### MITIGATION MEASURES

No mitigation is required.

#### FINDING

The City of Elk Grove City Council finds that, based upon substantial evidence in the record, 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 this topic or findings are warranted.

### 7.3.11 Population and Housing

The General Plan EIR, as amended by the 2023 Subsequent EIR, determined impacts related to population and housing would be less than significant (2023 Subsequent EIR Impact 3.7-1).

The Climate Compass is not a growth-inducing plan and as such, would not change the density of development within the Planning Area evaluated within the General Plan EIR, as amended by the 2023 Subsequent EIR. The Plan would not introduce new residential uses within the Planning Area, which would result in new residents or housing. Because the footprint of development within the Planning Area has not changed from the 2023 Subsequent EIR and the Climate Compass is not a growth-inducing plan, there would be no additional population and housing impacts as a result of adoption and implementation of the Plan. 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 population and housing is warranted. (Draft SEIR page 3-7)

#### MITIGATION MEASURES

No mitigation is required.

#### FINDING

The City of Elk Grove City Council finds that, based upon substantial evidence in the record, 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 this topic or findings are warranted.

### 7.3.12 Public Services and Recreation

The General Plan EIR, as amended by the 2023 Subsequent EIR, determined impacts related to public service and recreation would be less than significant, with the exception of impacts related to increased demand for new public school facilities which would be significant and unavoidable (2023 Subsequent EIR Impact 3.8-3 and Cumulative Impact 4-12).

The Climate Compass is not a growth-inducing plan and as such, would not change the density of development within the Planning Area evaluated within the General Plan EIR, as amended by the 2023 Subsequent EIR. The Plan would not introduce new residential uses within the Planning Area, which would result in new residents or housing. Since the Plan would not introduce new residents or housing, implementation of the Plan would not increase demand for new public school facilities beyond what was 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 public services and recreation is warranted. (Draft SEIR page 3-7)

#### MITIGATION MEASURES

No mitigation is required.

#### FINDING

The City of Elk Grove City Council finds that, based upon substantial evidence in the record, 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 this topic or findings are warranted.

## 7.3.13 Transportation

The General Plan EIR, as amended by the 2023 Subsequent EIR, determined impacts related to an exceedance of General Plan VMT thresholds would be significant and unavoidable (2023 Subsequent EIR Impact 3.9-1 and Cumulative Impact 4-14).

Implementation of the Climate Compass would not physically disrupt any existing bicycle, pedestrian, or transit facilities, nor adversely affect planned bicycle, pedestrian, or transit facilities identified in local planning documents such as the General Plan and the Bicycle, Pedestrian, and Trails Master Plan. Rather, Climate Compass strategies and actions would enhance the environment for pedestrians and bicyclists by expanding facilities for alternative modes of transportation, encouraging use, and increasing safety. Climate Compass strategies and actions that could result in construction activities would be required to meet all applicable standards related to encroachment and traffic control (i.e., Sections 6-13 and 6-14.02 of the City's Standard Construction Specifications). Additionally, all subsequent physical improvement projects would be required to meet City's Standard Construction Specifications and Improvement Standards as well as all State and City standards related to emergency vehicle access. While the types of facilities proposed to be constructed under the Plan are anticipated to be small-scale, project plans would be subject to review by emergency service agencies and City staff to ensure safety standards are met, as deemed necessary.

Implementation of the strategies and actions of the Climate Compass would not induce population or employment growth and, therefore, would not generate long-term increases in VMT. The types of small construction projects necessary to implement the Plan would not generate substantial automobile trips, and most construction trips would be truck trips that are not included in the CEQA Guideline definition of VMT. Implementation of the Climate Compass would involve policies and programs to increase the use of alternative forms of transportation as well as reduce overall VMT in the Planning Area. The Climate Compass quantified the reduction in community VMT based on implementation of the community transportation strategies and associated actions and determined the Plan would reduce communitywide VMT by 3.3 percent in 2030 and by 15 percent in 2045 (refer to Climate Compass Appendix C for details about the quantification approach and reduction estimates). Additional community and City operations strategies and actions also aid in reducing VMT by promoting alternative transportation; increasing accessibility to bicycle, pedestrian, and transit facilities; and installing new alternative transportation systems (e.g., 45 miles of new sidewalk and 50 miles of new bike lanes must be installed by 2030). 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 transportation is warranted. (Draft SEIR pages 3-7 and 3-8)

### MITIGATION MEASURES

No mitigation is required.

### FINDING

The City of Elk Grove City Council finds that, based upon substantial evidence in the record, 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 this topic or findings are warranted.

## 7.3.14 Utilities and Service Systems

The General Plan EIR, as amended by the 2023 Subsequent EIR, determined impacts related to sufficient water supply, infrastructure, and treatment would be significant and unavoidable (2023 Subsequent EIR Impact 3.10-1). The General Plan EIR, as amended by the 2023 Subsequent EIR, also determined cumulative impacts related to water service, wastewater, and groundwater use would be significant and unavoidable (2023 Subsequent EIR Cumulative Impacts 4-17, 4-18, and 4-20).

The Climate Compass is not a growth-inducing plan and as such, would not change the density of development within the Planning Area evaluated within the General Plan EIR, as amended by the 2023 Subsequent EIR. The Plan would not introduce new residential uses within the Planning Area, which would result in new residents or housing. Since the Plan would not introduce new residents or housing, implementation of the Plan would not increase demand on water service, wastewater service, and groundwater use beyond what was evaluated within the General Plan EIR, as amended by the 2023 Subsequent EIR. Furthermore, the Plan's strategies and associated actions promote water conservation and efficiency in community and City operations, which would help to reduce demand on water service and groundwater use within the Planning Area. 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 utilities and service systems is warranted. (Draft SEIR page 3-8)

### MITIGATION MEASURES

No mitigation is required.

### FINDING

The City of Elk Grove City Council finds that, based upon substantial evidence in the record, 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 this topic or findings are warranted.

## 7.4 CHAPTER 4: CUMULATIVE IMPACTS

### Impact 4-1: Cumulative Impacts Related to Energy

As discussed in greater detail in Section 3.1, "Energy," of the Draft SEIR, adoption of the Climate Compass would replace the 2019 CAP with an updated plan that is consistent with current regulations and aligned with Statewide GHG reduction goals as identified in the 2022 Scoping Plan set forth by AB 1279. As identified in the Climate Compass, GHGs in the Planning Area are primarily emitted from sources that combust fossil fuels for energy, such as gasoline and diesel in cars and natural gas in buildings. Implementation of the Plan would, overall, reduce fossil fuel consumption within the Planning Area by increasing energy efficiency and conservation, decarbonizing buildings, using renewable energy technology and sources, reducing VMT, and transitioning to zero-emission vehicles. This decrease in fossil fuel consumption within the Planning Area would result in greater electricity consumption, due to the required transition from on-site fossil fuel-powered energy (i.e., fossil natural gas combustion, diesel and gasoline use). Therefore, overall electricity demand would be expected to continue to increase throughout the Climate Compass's lifetime. Nevertheless, the Climate Compass includes measures and actions requiring investments in the city's renewable energy systems. These measures and actions, combined with the statutory renewable energy requirements of the Renewables Portfolio Standard, which the Sacramento Municipal Utility District (SMUD) must meet, would result in a broader availability of renewable energy (e.g., solar, wind) to meet this demand.

As described in Section 3.1, SMUD's 2022 Integrated Resource Plan (IRP) and the California Energy Commission's (CEC's) review of the IRP demonstrates that SMUD is capable of meeting the energy profile changes that would occur (i.e., transitioning from fossil fuel energy sources in favor of electricity, especially from renewable sources) with implementation of the Climate Compass. Additionally, the shift towards electricity sourced from renewables under the Climate Compass would be supported by SB 1020, which requires that eligible renewable energy resources and zero-carbon resources supply 90 percent of all retail sales of electricity to California end-use customers by December 31, 2035; 95 percent of all retail sales of electricity to California end-use customers by December 31, 2040; and 100 percent of all retail sales of electricity to California end-use customers by December 31, 2045. Furthermore, the Plan's strategies and actions that require the electrification and decarbonization of buildings and facilities, additional alternative transportation infrastructure, and energy efficiency and water conservation would result in a long-term reduction in energy consumption and the use of nonrenewable energy sources.

In addition, as GHG emissions are an inherent result of the generation and consumption of fossil-fuel related energy, plans that reduce fossil-fuel related energy consumption, require all-electric development, increase renewable energy generation, and improve energy efficiency are considered energy-related plans in addition to a GHG-related plan, such as the proposed Climate Compass and the 2022 Scoping Plan. The strategies and actions detailed in the Plan would improve energy efficiency, reduce energy demand (e.g., Action BF-3.1 and Action BF-3.3), and decrease transportation-related fossil fuel consumption (e.g., Action FEC-1.8 and Action FEC-1.3). Furthermore, the Plan would specifically align with the overarching goals of improved energy efficiency and reliance on renewable energy systems established in the Sacramento Area Council of Governments 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy, California Green Building Standards Code, SB 1020, EO B-55-18, SB 743, EO N-79-20, SMUD's 2030 Zero Carbon Plan, and Appendix D of the 2022 Scoping Plan.

Therefore, the Climate Compass would not result in a new or greater contribution to cumulative effects to energy beyond what was identified in the General Plan EIR, as amended by the 2023 Subsequent EIR. As such, the Plan's contribution to the less than significant cumulative impact would remain less than cumulatively considerable as identified in the General Plan EIR, as amended by the 2023 Subsequent EIR. (Draft SEIR page 4-4)

## **MITIGATION MEASURES**

No mitigation is required.

## **FINDING**

The City of Elk Grove City Council finds that, based upon substantial evidence in the record, the potential impacts related to the Plan's effects are less than significant, and no mitigation measures are required.

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## 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 the 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<sub>2</sub>e in 2030 and 333,017 MTCO<sub>2</sub>e 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<sub>2</sub>e in 2030 and 2,450 MTCO<sub>2</sub>e 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).

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. As such, the Climate Compass would result in a substantially reduced contribution to cumulative effects related to GHG emissions and climate change compared to what was identified in the General Plan EIR, as amended by the 2023 Subsequent EIR. As such, the Plan’s contribution to this significant cumulative impact would be reduced to less than cumulatively considerable. (Draft SEIR page 4-5)

### MITIGATION MEASURES

No mitigation is required.

### FINDING

The City of Elk Grove City Council finds that, based upon substantial evidence in the record, the potential impacts related to the Plan’s effects are less than significant, and no mitigation measures are required.

## 8 FINDINGS REGARDING ALTERNATIVES

Section 15126.6(a) of the State CEQA Guidelines requires the discussion of “a reasonable range of alternatives to a project, or the location of a project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives.” The Final SEIR identified and considered the following reasonable range of feasible alternatives to the proposed Plan which would be capable, to varying degrees, of reducing identified impacts:

- ▶ Alternative 1: No Project Alternative
- ▶ Alternative 2: Removal of Flexible Path Energy Efficiency Standards Alternative
- ▶ Alternative 3: Transit Expansion Alternative

These alternatives are evaluated for their ability to avoid or substantially lessen the impacts of the proposed Plan identified in the Final SEIR, as well as consideration of their ability to meet the basic objectives of the proposed Plan as described in the Final SEIR.

### 8.1 ALTERNATIVE 1: NO PROJECT ALTERNATIVE

#### 8.1.1 Description

The No Project Alternative assumes the Climate Compass would not be adopted and implemented and the City's climate action planning efforts would continue to be guided under the currently adopted 2019 CAP, which is not consistent with statewide GHG reduction goals as identified in the 2022 Scoping Plan, as directed by AB 1279. Under this alternative, the City would not adopt updated strategies and actions to reduce GHG emissions in accordance with these State-mandated reduction targets and future GHG emissions forecasts and reductions would be based on the NLA scenario from the Climate Compass. (Draft SEIR page 5-7)

#### 8.1.2 Finding

Implementation of this alternative would result in greater impacts related to energy consumption and GHG emissions compared to the impacts of the Plan. Furthermore, the No Project Alternative would not meet the project objectives, including developing an updated CAP to align the City's climate action planning with California's GHG emissions reduction goals and relevant regulations aimed at climate mitigation or implementing strategies and actions to transition the city away from fossil fuels and realize deep GHG emissions reductions through the near- and long-term future. Therefore, the City of Elk Grove City Council rejects the No Project Alternative as undesirable as it would not meet any of the project objectives and would result in greater environmental impacts compared to the Plan.

#### 8.1.3 Analysis

Under Alternative 1, the City's climate action planning efforts would continue to be guided solely under the currently adopted 2019 CAP as well as by federal and State legislative actions, and, thus, under this alternative, the Plan's benefits related to energy would not occur. For example, this alternative would not reduce reliance on fossil fuels to the same extent as the proposed Plan. Because a new CAP would not be adopted and implemented under Alternative 1, the City would continue to use fossil fuel energy sources, including natural gas, diesel, and gasoline at greater levels than with the implementation of the Plan's actions. Without a new CAP, Alternative 1 lacks a mechanism that requires the City to transition from fossil fuel energy use to carbon-free energy use outside of the requirements of the legislative actions.

While development under Alternative 1 would be required to comply with applicable federal and State legislative actions over the long-term (i.e., through 2045) similar to the Plan, Alternative 1 would not provide the same level of long-term reduction in fossil fuel energy consumption and use of carbon-free energy sources. In addition, Alternative 1 would not provide the same level of public health or energy efficiency benefits to the City as the Plan. Therefore, Alternative 1 would have a greater impact on energy consumption than the Plan.

Regarding GHG emissions, Alternative 1 would continue to reduce GHG emissions, although to a much lesser degree than the Plan, within the City throughout the foreseeable future. However, this alternative would not meet the City's 2030 and 2045 GHG reduction targets, which would be considered a potentially significant impact. To mitigate this potentially significant impact to a less-than-significant level, a CAP or similar type of plan would need to be developed for the City to provide the strategies and associated actions to serve as the mechanism to reduce GHG emissions consistent with statewide GHG reduction goals as identified in the 2022 Scoping Plan, as directed by AB 1279. However, because the purpose of this alternative is to examine an alternative that does not implement the Plan, this mitigation has been deemed infeasible and therefore, this impact would be significant and unavoidable. As such, Alternative 1 would result in a greater GHG emissions impact compared to the Climate Compass. (Draft SEIR pages 5-8 and 5-9)

## **8.2 ALTERNATIVE 2: REMOVAL OF ADVANCED BUILDING STANDARDS ACTIONS ALTERNATIVE**

### **8.2.1 Description**

Alternative 2 assumes the Climate Compass would be adopted with the exclusion of Actions BE-1.1, requiring the City to adopt flexible path energy efficiency standards 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 the City to adopt building standards that would require all new residential and nonresidential construction and major renovations to meet flexible path 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. (Draft SEIR page 5-9 and 5-10)

### **8.2.2 Finding**

For the reasons set forth below and more fully described in Final SEIR and in the record of proceeding, the City of Elk Grove City Council finds that Alternative 2 is undesirable as it would result in greater impacts related to energy and GHG emissions compared to the impacts of the Plan and would not fully meet the project objectives. The City of Elk Grove City Council also finds that this alternative would not provide substantial environmental benefits over the Plan. Therefore, the City of Elk Grove City Council declines to adopt this alternative pursuant to the standards in CEQA and the State CEQA Guidelines.

### **8.2.3 Analysis**

Alternative 2 would provide similar levels of benefits to energy efficiency and consumption compared to the Plan, 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 building standards, which would encourage transitioning from natural gas powered heating and appliances to electric alternatives for new construction and major renovations in both residential and nonresidential development and for increased EV charging at commercial uses, 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 standard based on the elimination of Action BE-1.1 would result in additional

natural gas use in new 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 Plan to reduce reliance on fossil fuel energy sources and improve energy efficiency. In addition, under this alternative, the removal of the building standard 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 Plan, this alternative would have greater impacts on energy than the Plan.

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<sub>2</sub>e, compared to 380,646 MTCO<sub>2</sub>e under the Plan. In total, by eliminating Actions BE-1.1 and TR-2.1, Alternative 2 would not provide 44,232 MTCO<sub>2</sub>e of GHG emissions reductions for 2030 that is provided under the Plan. 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<sub>2</sub>e in 2030 and -8,010 MTCO<sub>2</sub>e in 2045 under Alternative 2 compared to -53,031 MTCO<sub>2</sub>e in 2030 and -10,519 MTCO<sub>2</sub>e in 2045 under the Climate Compass). Therefore, Alternative 2 would have greater impacts on GHG emissions than the Plan. (Draft SEIR page 5-10 and 5-11)

## 8.3 ALTERNATIVE 3: TRANSIT EXPANSION ALTERNATIVE

### 8.3.1 Description

Alternative 3 assumes the Climate Compass would be amended to include a new action (i.e., TR-1.9) to support Community Strategy TR-1, "Decrease Vehicle Miles Traveled," and its associated actions (i.e., TR-1.1 through TR-1.8). The new Action TR-1.9 would be developed to include the expansion of bus services within the southwestern area of the City to support future fixed route light rail transit and/or bus rapid transit extension projects carried forward by the City in partnership with Sacramento Regional Transit (SacRT) (i.e., Blue Line/Bus Rapid Transit extension project or other future projects implemented under SacRT on the Move: Short-Range Transit Plan). Under this alternative, the City would work with SacRT to provide financial resources for additional bus line(s) within the southwestern area of the City (refer to Figure 5-1 in Chapter 5, "Alternatives"). In addition, the headways of the existing bus routes that run within city limits would be shortened to every 15 minutes to decrease wait times and increase connectivity to the larger transit system, which in turn would incentivize using the City's alternative transportation system and ultimately decrease VMT and GHG emissions. (Draft SEIR page 5-11)

### 8.3.2 Finding

For the reasons set forth below and more fully described in Final SEIR and in the record of proceeding, the City of Elk Grove City Council finds that while Alternative 3 would meet the project objectives and would result in similar impacts to energy and GHG emissions as the Plan, Alternative 3 is undesirable because it would not provide substantial environmental benefits over the Plan. As described in the Final SEIR, Alternative 3 is identified as the environmentally superior alternative because this alternative would be similar to the Plan but would include an additional action to expand the transit system to improve connectivity between the local and regional transit and bus systems. Implementation of Alternative 3 would promote use of the city's alternative transportation system and ultimately decrease VMT and single occupancy vehicle trips while also further reducing VMT-generated GHG emissions. However, implementation of this alternative would require further coordination with SacRT on changes to transit service operations and additional funding resources that may not ultimately be available or feasible to obtain. Therefore, the City of Elk Grove City Council declines to adopt this alternative pursuant to the standards in CEQA and the State CEQA Guidelines.

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### 8.3.3 Analysis

Under Alternative 3, the new Action TR-1.9 would require the City to coordinate with SacRT to add bus routes within the urban core of the city and increase existing bus headways to every 15 minutes to improve connectivity between the regional transit system and local transit system. Implementation of Action TR-1.9 would help to further reduce reliance on fossil fuel energy consumption by expanding alternative transportation services within the city to areas currently not fully served by transit as well as increase the frequency to help incentivize the use of such services. By increasing reliability and accessibility, more residents are anticipated to use alternative transportation regularly, which would help reduce VMT and reduce fossil fuel consumption in single-occupancy vehicles. While increasing bus routes and headways would promote the use of alternative transportation, it is speculative at this time to determine if this alternative would be different enough from the Plan, from an impact perspective, to differentiate from the Plan's benefits. Therefore, this alternative would result in similar impacts to energy as the Plan.

Increasing the number of bus routes under Alternative 3 would be expected to result in additional GHG emissions reductions as the new bus routes would be along roadways that currently do not have bus routes and are located in proximity to the planned blue line extension in the City's General Plan, where they would provide alternative transportation services to new residents/areas of the city and help to further reduce VMT-generated GHG emissions by increasing alternative transportation services in the city. While increasing bus routes and headways would increase the frequency and timing of the local bus system and would help to improve connectivity within the City and with the regional transit system, it is speculative at this time to determine if increasing existing bus headways would result in additional GHG emissions reductions that are substantial enough to differentiate from the benefits of the Plan. Therefore, this alternative would result in similar impacts to GHGs and climate change as the Plan. (Draft SEIR pages 5-11 and 2-12).