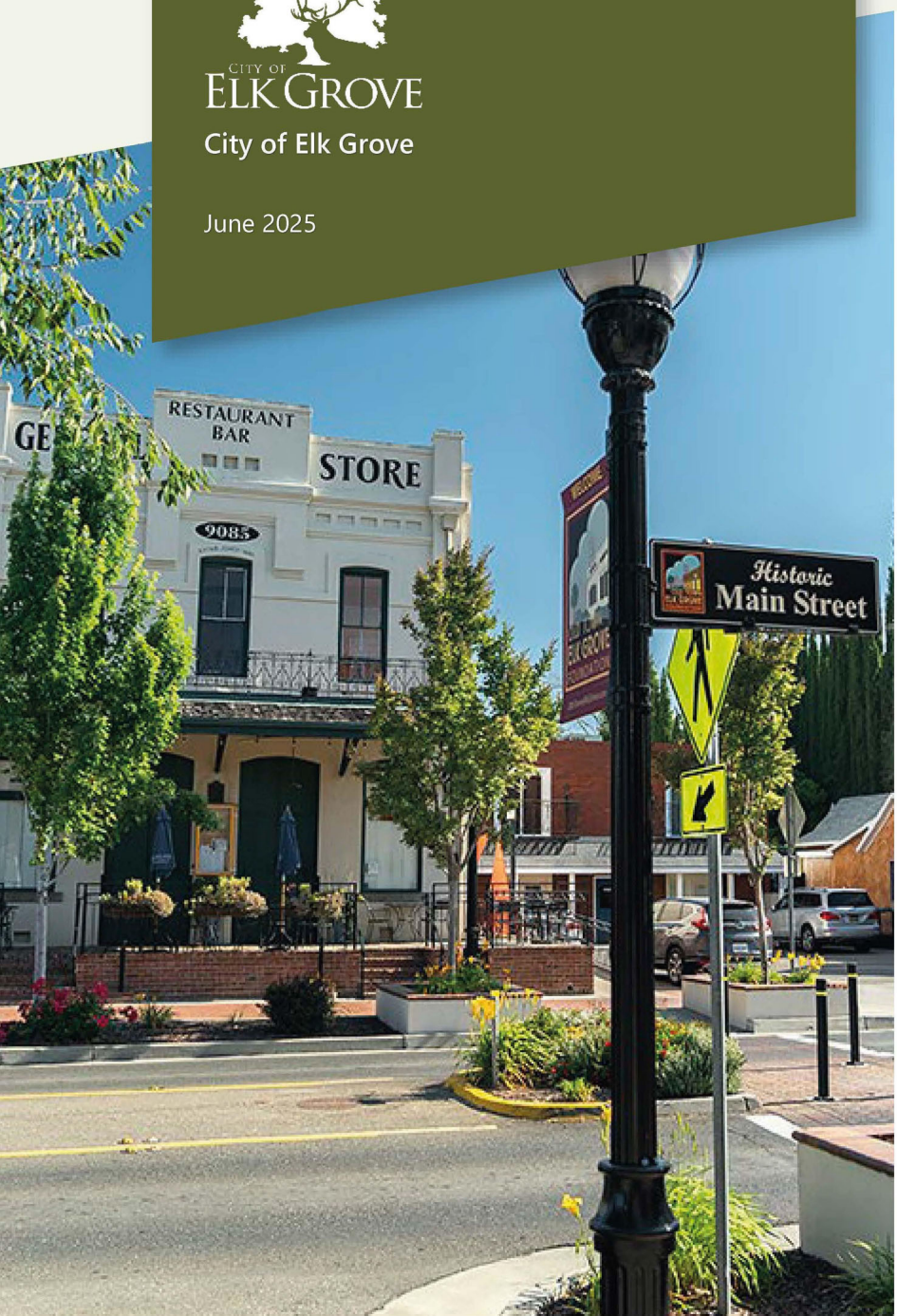
Draft Supplemental Environmental Impact Report for the Climate Compass Project

State Clearinghouse No. 2017062058

Prepared for:

City of Elk Grove

June 2025



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Prepared for:

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LIST OF ABBREVIATIONS

2019 CAP or 2019 CAP Update	*City of Elk Grove Climate Action Plan 2019 Update*
2022 Scoping Plan	*2022 Scoping Plan for Achieving Carbon Neutrality*
2023 Subsequent EIR	Subsequent EIR to the General Plan EIR
AB	Assembly Bill
ACC II	Advanced Clean Cars II
ACF	Advanced Clean Fleets
BAU	business-as-usual
BE	Buildings and Energy
BEMS	building energy management system
BF	Buildings and Facilities
CAA	Clean Air Act
CAFE	Corporate Average Fuel Economy
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen Code	California Green Building Standards Code
CAP	climate action plan
CARB	California Air Resources Board
CCR	California Code of Regulations
CCSD	Cosumnes Community Services District
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CH_4	methane
Checklist	Climate Compass Consistency Review Checklist
CI	carbon intensity
City	City of Elk Grove
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
CPRG	Climate Pollution Reduction Grants
CRCPP	Capital Region Climate Priorities Plan
e-bike	electric bike
EGUSD	Elk Grove Unified School District
EIR	Environmental Impact Report
EO	Executive Order
EPA	US Environmental Protection Agency
EV	electric vehicle
FEC	Fleet and Employee Commute
GE	Green Economy
General Plan EIR	General Plan Update Environmental Impact Report
General Plan	2019 General Plan Update
GHG	greenhouse gas
GPAs/VMT Standards Project	General Plan Amendments and Update of Vehicle Miles Traveled Standards Project
GSAT	global-mean surface air temperature
GWP	global warming potential
HERO	Home Energy Renovation Opportunity
I-5	Interstate 5
ICT	Innovative Clean Transit

IEPR	Integrated Energy Policy Report
IPCC	Intergovernmental Panel on Climate Change
IRP	Integrated Resource Plan
LCFS	Low Carbon Fuel Standard
LEA	Livable Employment Area
$MMTCO_2e$	million metric tons of CO_2-equivalent
MPO	metropolitan planning organization
$MTCO_2e$	metric tons of carbon dioxide equivalent
MTP/SCS	Metropolitan Transportation Plan/Sustainable Communities Strategy
N_2O	nitrous oxide
NHTSA	National Highway Traffic Safety Administration
NLA	no local action
NOP	Notice of Preparation
PACE	Property Assessed Clean Energy
PG&E	Pacific Gas and Electric Company
Plan or Project	proposed Climate Compass
Planning Area	all land within the current city limits as well as the study areas
PM	particulate matter
PRC	Public Resources Code
PUC	Public Utilities Code
PV	photovoltaic
RA	Resilience and Adaptation
RC	Resource Consumption
RTP	regional transportation plan
SacOES	Sacramento County Office of Emergency Services
SACOG 2020 MTP/SCS	Sacramento Area Council of Governments 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy
SACOG	Sacramento Area Council of Governments
SacRT	Sacramento Regional Transit
SacSewer	Sacramento Area Sewer District
SB	Senate Bill
SCS	sustainable communities strategy
SDMP	Storm Drainage Master Plan
SEIR	Supplemental Environmental Impact Report
SMAQMD	Sacramento Metropolitan Air Quality Management District
SMUD	Sacramento Municipal Utility District
SORE	small off-road engine
SR	State Route
STF	Sacramento Tree Foundation
TAC	toxic air contaminants
TACM	Transportation Alternatives and Congestion Management
TR	Transportation
US DOT	US Department of Transportation
VMT	vehicle miles traveled
VRF	variable refrigerant flow
WW	Solid Waste and Water
ZEV	zero-emission vehicles

EXECUTIVE SUMMARY

ES.1 INTRODUCTION

This summary is provided in accordance with California Environmental Quality Act Guidelines (State CEQA Guidelines) Section 15123. As stated in Section 15123(a), "an EIR [environmental impact report] shall contain a brief summary of the proposed action and its consequences. The language of the summary should be as clear and simple as reasonably practical." As required by the guidelines, this chapter includes (1) a summary description of the proposed Climate Compass (Plan); (2) a synopsis of environmental impacts and recommended mitigation measures (Table ES-1, presented at the end of this chapter); (3) identification of the alternatives evaluated and of the environmentally superior alternative; (4) a discussion of the areas of controversy associated with the Plan; and (5) issues to be resolved.

ES.2 SUMMARY DESCRIPTION OF THE PROJECT

The proposed Plan is a comprehensive update to the City of Elk Grove's (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 (2021-22 Legislative Session), which requires California to achieve net-zero GHG emissions and an 85 percent reduction in anthropogenic GHG emissions by 2045.

ES.2.1 Project Background

On February 27, 2019, the City adopted the General Plan Update (General Plan) and the 2019 CAP Update (2019 CAP), and certified the General Plan Environmental Impact Report (EIR) (SCH No. 2017062058). Both the General Plan and 2019 CAP were programmatically evaluated within the General Plan EIR as separate documents.

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 judgment, bears relation to its planning efforts (referred to as study areas). The 2019 CAP included an updated communitywide emissions inventory for the General Plan Planning Area, along with updated emissions forecasts for 2020, 2030, and 2050 based on land use activities anticipated with implementation of the General Plan. In addition to the 2019 CAP, the General Plan EIR also evaluated the General Plan; amendments to the East Elk Grove Specific Plan, the East Franklin Specific Plan, and the Laguna Ridge Specific Plan; amendments to the Zoning Code to maintain consistency with the General Plan; and an update to the City's Parks and Recreation Master Plan.

The General Plan EIR concluded that while adoption of the General Plan and the 2019 CAP would primarily result in less than significant impacts related to GHG emissions and energy, significant and unavoidable impacts would occur under the GHG Emissions Appendix G threshold, "Conflict with an Applicable Plan, Policy, or Regulation Adopted for the Purpose of Reducing the Emissions of GHGs." For this Appendix G threshold, the General Plan EIR concluded significant and unavoidable impacts since the adoption and implementation of the General Plan and 2019 CAP would likely not result in sufficient GHG reductions for the city to meet the long-term GHG emission reduction goal for 2050 as stated in Executive Order (EO) S-3-05. The General Plan EIR also evaluated an alternative to the project that included additional measures to the 2019 CAP to further exceed established GHG reduction targets for 2020 and 2030 and allow the city to meet the State's targets for 2050. However, this alternative was not identified as the environmentally superior alternative as the General Plan EIR concluded that it would result in similar impacts, if not greater in certain instances, as the project.

Since its adoption in 2019, the General Plan has been amended seven times, three times with Supplemental /Subsequent EIRs for the Housing and Safety Element Update, the Southeast Industrial Area Specific Plan, and most recently, the General Plan Amendments and Update of Vehicle Miles Traveled (VMT) Standards Project (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) (SCH No. 2022020463). The GPAs/VMT Standards Project included amendments to the General Plan for the creation of the Livable Employment Area Community Plan Area; an update to the City's VMT thresholds, including associated changes to the Transportation Analysis Guidelines; revisions to the

South and West Study Areas in the General Plan; incorporation of the Grant Line Road Precise Plan as part of the Rural Area Community Plan; other land use changes; and amendments to the adopted General Plan Mitigation Measures MM 5.5.1a and MM 5.5.1b associated with cultural resource impacts.

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 associated with the creation of the Livable Employment Area Community Plan (LEA Community Plan). The intent of the LEA Community Plan is to connect transportation with land-use planning and design in recognition that the most economically, socially, and environmentally successful communities are walkable and contain a mix of uses. This land use change was directed in 2019 by the Elk Grove City Council to leverage the value of a planned new thoroughfare, Kammerer Road, beyond its ability to carry vehicle traffic, to lay the foundation for economic development in the form of a 21st century employment center. As identified in its 2023 Subsequent EIR, this change in development intensity and other associated to the General Plan results in improved VMT limits by land use designation (City of Elk Grove 2023:Table 3.9-3) as well as reduced per capita GHG emissions in 2040 (2.9 $MTCO_2e$ per year) as compared to what is identified in the 2019 CAP for 2050 (3.0 $MTCO_2e$ per year) (City of Elk Grove 2023:3.5-4 and 3.5-11). This updated version of the General Plan is the foundational land use plan used for the Climate Compass.

Since its adoption in 2019, the 2019 CAP has been amended three times, including in December 2019 to update solar photovoltaic (PV) requirements (measure BE-7) to be consistent with the 2019 building code; in December 2022 to update electric vehicle (EV) charging requirements (measure TACM-9) to be consistent with the 2022 building code; and, most recently, in December 2024 to update EV charging requirements (measure TACM-9) to be consistent with the 2024 building code and to change the language of measure BE-5 to remove reference to the zero net energy standard for residential buildings and replace it with the decreased energy emissions requirement (City of Elk Grove 2024a). While the first two amendments to the 2019 CAP were exempt from CEQA in accordance with Section 15162 of the State CEQA Guidelines, a General Plan EIR addendum was approved by the City Council on December 11, 2024 for the December 2024 amendment to the 2019 CAP (City of Elk Grove 2024b). The General Plan EIR addendum determined that the December 2024 amendment to the 2019 CAP did not constitute substantial changes, did not change physical circumstances, and did not provide new information of substantial importance that could not have been known at the time of the 2019 CAP was approved and thus, would not result in a new or substantially more severe impact compared to the 2019 CAP as evaluated in the certified General Plan EIR (City of Elk Grove 2024b).

In 2023, the City initiated the development of the Climate Compass 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. The Plan was developed by first 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's consultant 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, the City 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 emissions inventory, forecasts, and reduction targets; the finalized communitywide climate strategies and actions; City operations strategies and actions; and the implementation framework for the Plan, has been released for public review concurrently with this Draft SEIR on the City's website: https://elkgrove.gov/cap. For a detailed timeline of the development of the Plan, please refer to Chapter 1, "Introduction," of the Climate Compass.

ES.2.2 Project Objectives

The primary objectives of the Plan are to:

- Develop an updated CAP to align the City's climate action planning with California's GHG reduction goals and relevant regulations aimed at climate mitigation.
- Implement strategies and actions to transition the city away from fossil fuels and realize deep GHG emissions reductions through the near- and long-term future.

- Connect and amplify existing sustainability efforts in a cohesive, impactful plan.
- Incorporate climate adaptation and resilience actions to address the city's most pressing natural and climate-related hazards.
- Develop a CEQA-qualified CAP to provide a mechanism for streamlining project-level GHG emissions analysis consistent with Section 15183.5 of the State CEQA Guidelines and the entitlement process for future sustainability projects and climate-friendly development within the city.
- Communicate climate challenges and opportunities, foster climate education, and empower the community to contribute to solutions.
- Ensure equitable climate action by prioritizing projects and programs that benefit historically underserved communities.
- Develop an updated CAP that is consistent with the recently adopted amendments to the City's General Plan in 2023, which was amended to increase development intensity to improve VMT efficiency and reduce GHG emissions by creating walkable communities with amenities that attract and retain businesses and residents.

ES.2.3 Project Location

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

Existing land uses within the city limits consist of residential at varying densities, commercial, office, industrial, park, and open space. Within the study areas, existing land uses primarily consist of agricultural lands and rural residential uses. Nearby natural open space and habitat areas include the Stone Lakes National Wildlife Refuge and the Sacramento River to the west, the Cosumnes River Preserve to the south, and the Sacramento Area Sewer District (SacSewer) bufferlands to the northwest. Major roadway access to the City is provided by I-5 and SR 99. Upon adoption, the Plan would serve as the long-term CAP for land uses within the City's jurisdiction within the General Plan Planning Area.

ES.2.4 Project Characteristics

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

The Plan has been developed to provide:

- A baseline of major sources of GHG emissions;
- A projection of future GHG emissions expected to occur within the Planning Area 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.

ES.3 ENVIRONMENTAL IMPACTS AND RECOMMENDED MITIGATION MEASURES

This Draft SEIR has been prepared pursuant to the CEQA (Public Resources Code [PRC] Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations, Title 14, Chapter 3, Section 15000, et seq.) to evaluate the physical environmental effects of the proposed Plan. The City is the lead agency. The City Council has the principal responsibility for approving and implementing the Plan and for ensuring that the requirements of CEQA have been met.

Table ES-1, presented at the end of this chapter, provides a summary of the environmental impacts for the Plan. The table identifies the level of significance of the impact before mitigation, recommended mitigation measures, and the level of significance of the impact after implementation of the mitigation measures.

For detailed discussions of all Plan impacts and mitigation measures, the reader is referred to the topical environmental analysis in Chapter 3, "Environmental Setting, Impacts, and Mitigation Measures." Cumulative impacts are discussed in Chapter 4, "Cumulative Impacts."

ES.4 SIGNIFICANT AND UNAVOIDABLE IMPACTS

This Draft SEIR has been prepared to evaluate whether implementation of the Plan would result in new or substantially more severe impacts than what was evaluated within the General Plan EIR, as amended by the Subsequent EIR for the GPAs/VMT Standards Project in 2023 (hereinafter referred to as the 2023 Subsequent EIR). The General Plan EIR and 2023 Subsequent EIR identified the following significant and unavoidable impacts:

- Impact 3.1-1: Substantially Degrade Existing Visual Character or Quality of Public Views
- Impact 3.1-2: Create a New Source of Substantial Light or Glare
- Impact 3.2-1: Construction Emissions of Criteria Air Pollutants
- Impact 3.2-2: Operational Air Quality
- Impact 3.2-4: Exposure of Sensitive Receptors to Toxic Air Contaminants
- Impact 3.5-1: Project Generated Greenhouse Gas Emissions
- Impact 3.6-2: Increased Traffic Noise
- Impact 3.8-3: Increased Demand for New Public School Facilities
- Impact 3.9-1: Result in an Exceedance of City of Elk Grove General Plan VMT Thresholds
- Impact 3.10-1: Adverse Impacts on Sufficient Water Supply, Infrastructure, and Treatment
- Impact 3.11-1: Agricultural Resources
- Impact 3.11-2: Biological Resources
- Impact 4-1: Cumulative Visual Resources Impacts
- Impact 4-2: Cumulative Light and Glare Impacts
- Impact 4-3: Cumulative Air Quality Impacts
- Impact 4-6: Cumulative Greenhouse Gas Impacts
- Impact 4-7: Cumulative Traffic Noise Impacts
- Impact 4-8: Cumulative Construction and Development Noise and Vibration Impacts
- Impact 4-12: Cumulative Public School Impacts
- Impact 4-14: Cumulative Impacts on Vehicle Miles Traveled

- Impact 4-17: Cumulative Water Service Impacts
- Impact 4-18: Cumulative Wastewater Impacts
- Impact 4-20: Cumulative Groundwater Use Impacts

As discussed in greater detail in Chapter 3, "Environmental Setting, Impacts, and Mitigation Measures," of this Draft SEIR, adoption and implementation of the Plan would not result in any new or substantially more severe significant impacts than those disclosed in the General Plan EIR, as amended by the 2023 Subsequent EIR. No new or modified mitigation is proposed.

ES.5 ALTERNATIVES TO THE PROPOSED PROJECT

Chapter 5, "Alternatives," of this Draft SEIR provide an evaluation of the alternatives to the Plan as well as the alternatives considered but rejected from further consideration. The following alternatives are evaluated in detail within this Draft SEIR:

- **Alternative 1: 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 No Local Action (NLA) scenario from the Climate Compass.
- **Alternative 2**: **Removal of Reach Code Actions Alternative** assumes the Climate Compass would be adopted with the exclusion of Actions BE-1.1 and TR-2.1, both of which require the City to adopt reach codes by 2026, from the Community GHG Emissions Reduction Strategies and associated actions list. Under this alternative, all strategies and associated actions included for City operations under the Climate Compass would remain the same. Specifically, Actions BE-1.1 and TR-2.1 require the City to adopt reach codes encouraging transition from natural gas powered heating and appliances to electric alternatives for new construction and major renovations in both residential and nonresidential development and for electric vehicle (EV) charging, respectively. The adoption of reach codes are voluntary and must be proven to be cost effective and approved by the California Energy Commission.
- **Alternative 3: Transit Expansion Alternative** 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 city's urban core to support future fixed route transit and/or bus rapid transit extension projects carried forward by the City (e.g., blue line extension project) or by Sacramento Regional Transit (SacRT) (i.e., SacRT on the Move: Short-Range Transit Plan). Under this alternative, the City would work with SacRT to provide financial resources for additional bus lines within the southwestern area of the City. In addition, existing bus headways within the city's urban core would shorten to every 15 minutes to decrease waiting 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.

ES.6 AREAS OF CONTROVERSY

State CEQA Guidelines Section 15123 requires the summary section of a Draft EIR to identify the areas of controversy known to the lead agency, including issues raised by agencies and the public. A Notice of Preparation (NOP) was circulated for public review in December 2024 and comments pertaining to the Plan, including those that raised areas of controversy, were collected and reviewed as part of preparation of this Draft SEIR (Appendix A). The areas of controversy associated with the Plan are:

- The level of detail required for the Plan's strategies and actions.
- The use of the Plan for streamlining the GHG emissions analysis of future projects.

These issues are each addressed in this Draft SEIR. Any impacts related to these issues are identified either as less than significant or as less than significant after mitigation with the exception of the impacts identified under the heading "Significant and Unavoidable Impacts," above. Issues related to impacts identified as significant and unavoidable remain areas of controversy.

ES.7 ISSUES TO BE RESOLVED

State CEQA Guidelines Section 15123 requires the summary section of a Draft EIR to identify issues to be resolved related to a proposed project. Issues to be resolved for the proposed Plan by the City are identified below, including issues that will not necessarily be resolved through the Draft SEIR:

- Should the Climate Compass be approved as proposed?
- Does this SEIR adequately describe the environmental impacts associated with implementation of the Plan?

Table ES-1 Summary of Impacts and Mitigation Measures

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
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.	LTS	No mitigation is required.	LTS
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 EV charging and reduce VMT by enhancing roadway connectivity, increasing and improving bicycle and pedestrian infrastructure, and improving 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.	LTS	No mitigation is required.	LTS
Impact 4-1: Cumulative Impacts Related to Energy As discussed in greater detail in Section 3.1, "Energy," of this 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 SMUD must meet, would result in a broader availability of renewable energy (e.g., solar, wind) to meet this demand.	LTS	No mitigation is required.	LTS

NI = No impact LTS = Less than significant PS = Potentially significant S = Significant SU = Significant and unavoidable

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
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, the 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.			
Greenhouse Gas Emissions			
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	LTS	No mitigation is required.	LTS

NI = No impact LTS = Less than significant PS = Potentially significant S = Significant SU = Significant and unavoidable

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
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.			
Impact 3.2-2: 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 $MTCO_2e$ per capita by 2050 consistent with 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.	LTS	No mitigation is required.	LTS

NI = No impact LTS = Less than significant PS = Potentially significant S = Significant SU = Significant and unavoidable

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
Impact 4-2: Cumulative Impacts Related to Greenhouse Gas Emissions and Climate Change As discussed in greater detail in Section 3.2, "Greenhouse Gas Emissions And Climate Change," of this Draft SEIR, adoption and implementation of the Climate Compass would achieve the City's 2030 and 2045 GHG emission reduction goals consistent with statewide GHG reduction goals as identified in the 2022 Scoping Plan set by AB 1279. Despite minor construction and operational GHG emissions occurring with the implementation of the Climate Compass, the Plan would reduce overall GHG emissions from sources in the community and City operations. Notably, the majority of GHG reductions would be achieved through the community GHG reduction strategies and their associated actions detailed in Table 2-14 of Chapter 2, "Project Description." The total estimated community GHG emissions reductions from all quantified strategies and actions would be 386,053 $MTCO_2e$ in 2030 and 356,645 $MTCO_2e$ in 2045. While constituting a smaller portion of the City's GHG reductions, the total estimated City operations GHG emissions reductions from all quantified strategies and action would be 4,425 $MTCO_2e$ in 2030 and 5,949 $MTCO_2e$ in 2045. In addition, while implementation of the Plan would achieve the City's GHG emissions reduction targets for 2030 and 2045, the Plan also provides the City with a surplus of GHG emissions reductions. Overall, GHG emissions would be substantially reduced in 2030 and 2045 compared to the "no local action" (NLA) scenario (i.e., implementation of the General Plan without implementation of the strategies and actions included in the Climate Compass). 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.	LTS	No mitigation is required.	LTS

1 INTRODUCTION

The proposed Climate Compass (Plan) is a comprehensive update to the City of Elk Grove's (City) current Climate Action Plan (CAP), adopted in 2019. The proposed Plan establishes a roadmap for the City to achieve its greenhouse gas (GHG) emission reduction targets and includes actions and strategies to adapt to anticipated climate-related impacts. In addition, the Plan aligns local efforts with Assembly Bill (AB) 1279, which requires California to achieve net-zero GHG emissions by 2045 and an 85 percent reduction in anthropogenic GHG emissions by 2045.

This Draft Supplemental Environmental Impact Report (SEIR) is being prepared as an amendment to the City's certified General Plan Update Environmental Impact Report (General Plan EIR) (SCH No. 2017062058), which programmatically evaluated both the General Plan Update (General Plan) and the 2019 CAP Update (2019 CAP) as separate documents. This Draft SEIR has been prepared under the direction of the City in accordance with the requirements of the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Section 21000 et seq.) and the State CEQA Guidelines. This chapter of the Draft SEIR provides information on:

- the Project requiring environmental analysis (background and synopsis);
- the Project's relationship to the current regulatory context and General Plan EIR;
- the type, purpose, and intended uses of the Draft SEIR;
- the agency roles and responsibilities;
- the public and environmental review process;
- the scope of this Draft SEIR;
- the organization of the Draft SEIR; and
- the standard terminology.

1.1 PROJECT OVERVIEW

1.1.1 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, has been released for public review concurrently with this 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.

1.1.2 Project Description

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

The Project 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 VMT efficiency and reduce GHG emissions by creating walkable communities with amenities that attract and retain businesses and residents.

1.2 REGULATORY CONTEXT

1.2.1 Relationship to Climate Action Planning Legislation

Climate-related legislation has been adopted at multiple levels of government, with State climate regulations and goals providing guidance and examples for local government actions to reduce GHG emissions. In California, AB 32, enacted in 2006, established the United States' first comprehensive, long-term approach to addressing climate change. AB 32 led to the development of State programs and standards, such as the Advanced Clean Cars Standard and Renewables Portfolio Standard, that target GHG emissions reductions from cars and trucks, electricity production, fuels, and other sources. Since the passage of AB 32, the State has continued to enact complementary legislation that addresses GHG emissions from specific sectors including land use, transportation, energy, and water, as well as environmental justice and public health issues. Enacted in 2016, Senate Bill (SB) 32 established the State's 2030 GHG emissions reduction target at 40 percent below 1990 levels. Executive Order (EO) S-3-05 called for statewide GHG emissions to be reduced to 80 percent below 1990 levels by 2050.

More recently, AB 1279 was enacted in 2022 and requires the State to achieve net zero GHG emissions no later than 2045, as well as statewide anthropogenic GHG emissions to be reduced to at least 85 percent below 1990 levels by 2045. Specifically, AB 1279 requires the California Air Resources Board (CARB) to work with other State agencies to develop and implement comprehensive strategies, policies, and regulations to meet this target. These efforts will focus on reducing emissions across various sectors, including energy, transportation, industry, and agriculture, while also prioritizing equity and protecting vulnerable communities.

To support the goals of AB 1279, CARB released the *Final 2022 Scoping Plan for Achieving Carbon Neutrality* (2022 Scoping Plan) on November 16, 2022. The 2022 Scoping Plan traces the pathway for the State to achieve the AB 1279 targets. The 2022 Scoping Plan details strategies to reduce GHG emissions across sectors such as energy, transportation, industry, agriculture, and natural and working lands. Building on previous plans, it incorporates the latest scientific findings, technological advancements, and policy developments to guide the state toward a sustainable, low-carbon future. The plan emphasizes transitioning to clean energy sources, electrifying transportation and buildings, reducing

vehicle miles traveled (VMT), and implementing nature-based solutions to sequester carbon. It also emphasizes environmental justice as an essential component of climate action to ensure all communities benefit equitably.

Local land use agencies often choose to align their climate action and adaptation plans with statewide targets and strategies outlined in the 2022 Scoping Plan. Collaborating with State agencies, community organizations, and other stakeholders also helps with plan implementation and progress toward achieving local GHG reduction targets.

1.2.2 Relationship to the City of Elk Grove General Plan EIR, as Amended by the 2023 Subsequent EIR

On February 27, 2019, the City adopted the General Plan and the 2019 CAP and certified the General Plan EIR (SCH No. 2017062058). The General Plan EIR programmatically evaluated both the General Plan and 2019 CAP as separate documents.

The 2019 CAP was developed to be consistent and aligned with the goals identified in the 2017 Scoping Plan to meet the statewide GHG emission reduction targets for 2020 and 2030, as established by AB 32 and SB 32. Based on the regulatory setting at the time, the 2019 CAP included an updated communitywide emissions inventory for the city along with updated emissions forecasts for 2020, 2030, and 2050 based on land use activities anticipated with implementation of the General Plan. In addition to the 2019 CAP, the General Plan EIR evaluated the General Plan; amendments to the East Elk Grove Specific Plan, the East Franklin Specific Plan, and the Laguna Ridge Specific Plan; amendments to the Zoning Code to maintain consistency with the General Plan; and an update to the City's Parks and Recreation Master Plan.

Since its adoption in 2019, the 2019 CAP has been amended three times, including in December 2019 to update solar photovoltaic (PV) requirements (measure BE-7) to be consistent with the 2019 building code; in December 2022 to update electric vehicle (EV) charging requirements (measure TACM-9) to be consistent with the 2022 building code; and, most recently, in December 2024 to update EV charging requirements (measure TACM-9) to be consistent with the 2024 building code and to change the language of measure BE-5 to remove reference to the zero net energy standard for residential buildings and replace it with the decreased energy emissions requirement (City of Elk Grove 2024a). While the first two amendments to the 2019 CAP were exempt from CEQA in accordance with Section 15162 of the State CEQA Guidelines, a General Plan EIR addendum was approved by the City Council on December 11, 2024 for the December 2024 amendment to the 2019 CAP (City of Elk Grove 2024b). The General Plan EIR addendum determined that the December 2024 amendment to the 2019 CAP did not constitute substantial changes, did not change physical circumstances, and did not provide new information of substantial importance that could not have been known at the time of the 2019 CAP was approved and thus, would not result in a new or substantially more severe impact compared to the 2019 CAP as evaluated in the certified General Plan EIR (City of Elk Grove 2024b).

Since its adoption in 2019, the General Plan has been amended seven times, three times with Supplemental /Subsequent EIRs for the Housing and Safety Element Update, the Southeast Industrial Area Specific Plan, and most recently, the General Plan Amendments and Update of VMT Standards Project (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) (SCH No. 2022020463). The GPAs/VMT Standards Project included amendments to the General Plan for the creation of the Livable Employment Area Community Plan Area; an update to the City's VMT thresholds, including associated changes to the Transportation Analysis Guidelines; revisions to the South and West Study Areas in the General Plan; incorporation of the Grant Line Road Precise Plan as part of the Rural Area Community Plan; for other land use changes; and amendments to the adopted General Plan Mitigation Measures MM 5.5.1a and MM 5.5.1b associated with cultural resource impacts.

The GPAs/VMT Standards Project did not include an update to the 2019 CAP, but amended General Plan that increased residential densities and mixed-use opportunities associated with the creation of the Livable Employment Area Community Plan (LEA Community Plan). The intent of the LEA Community Plan is to connect transportation with land-use planning and design in recognition that the most economically, socially, and environmentally successful communities are walkable and contain a mix of uses. This land use change was directed in 2019 by the Elk Grove City

Council to leverage the value of a planned new thoroughfare, Kammerer Road, beyond its ability to carry vehicle traffic, to lay the foundation for economic development in the form of a 21st century employment center. As identified in its 2023 Subsequent EIR, this change in development intensity and other associated to the General Plan results in improved VMT limits by land use designation (City of Elk Grove 2023:Table 3.9-3) as well as reduced per capita GHG emissions in 2040 (2.9 $MTCO_2e$ per year) as compared to what is identified in the 2019 CAP for 2050 (3.0 $MTCO_2e$ per year) (City of Elk Grove 2023:3.5-4 and 3.5-11). This updated version of the General Plan is the foundational land use plan used for the Climate Compass.

1.3 TYPE, PURPOSE, AND INTENDED USES OF THIS DRAFT SEIR

Pursuant to Section 15163 of the State CEQA Guidelines, a supplemental EIR should be prepared if an EIR has been certified for a project, but one or more of the following conditions are met.

(a) The Lead or Responsible Agency may choose to prepare a supplement to an EIR rather than a subsequent EIR if:

  (1) Any of the conditions described in Section 15162 would require the preparation of a subsequent EIR, and

  (2) Only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation.

(b) The supplement to the EIR need contain only the information necessary to make the previous EIR adequate for the project as revised.

(c) A supplement to an EIR shall be given the same kind of notice and public review as is given to a draft EIR under Section 15087.

(d) A supplement to an EIR may be circulated by itself without recirculating the previous draft or final EIR.

(e) When the agency decides whether to approve the project, the decision-making body shall consider the previous EIR as revised by the supplemental EIR. A finding under Section 15091 shall be made for each significant effect shown in the previous EIR as revised.

The Climate Compass is proposed as an update to the City's current CAP as evaluated in the General Plan EIR and utilizes the City's current land use plan and map as evaluated in the 2023 Subsequent EIR. As such, the Plan would require minor changes to these previous EIRs, and the City has determined that preparation of a SEIR to the General Plan EIR, as amended by the 2023 Subsequent EIR, is the appropriate CEQA document for the Project.

The Draft and Final versions of General Plan EIR are available for review through the City and online at the following location: https://www.elkgrove.gov/general-plan/general-plan-documents.

The Draft 2023 Subsequent EIR for the GPAs/VMT Standards Project is available for review through the Governor's Office of Land Use and Climate Innovation CEQAnet Web Portal at: https://ceqanet.opr.ca.gov/2022020463/2. The Final 2023 Subsequent EIR is available for review on the City's website at: https://www.elkgrove.gov/sites/default/files/city-files/Departments/strategic_planning/kammerer-road-urban-design-study/elk-grove-gp-amendment-fseir-2023-08-18.pdf.

An EIR is a public informational document used in the planning and decision-making process. An EIR assesses the environmental effects related to the planning, construction, and/or operation of a project and indicates ways to reduce or avoid significant environmental impacts. An EIR also discloses significant environmental impacts that cannot be avoided; any growth-inducing impacts of a project; effects found not to be significant; and significant cumulative impacts of past, present, and reasonably foreseeable future projects in combination with the impacts of the project.

As an informational document for decision makers, a Draft SEIR is not intended to recommend either approval or disapproval of a project. CEQA requires the decision makers to balance the benefits of a project against its unavoidable environmental impacts. If environmental impacts are identified as significant and unavoidable (i.e., no feasible mitigation is available to reduce the impact to a less-than-significant level), the City may still approve the project if it believes that social, economic, or other benefits outweigh the unavoidable impacts. The City would then be required to make findings

and state, in writing, the specific reasons for approving the project, based on information in the Draft SEIR and other information in the administrative record. In accordance with Section 15093 of the State CEQA Guidelines, the document containing such reasons is called a "statement of overriding considerations."

The program-level analysis in this SEIR considers the broad environmental effects of the Plan. This SEIR will be used to evaluate subsequent projects and activities under the Plan or used to tier future consistent projects' GHG analysis (refer to Section 2.5.2, "Future Streamlining of GHG Emissions Analysis at the Project-Level," in Chapter 2, "Project Description"). This SEIR is intended to provide the information and environmental analysis necessary to assist public agency decision-makers in considering approval of the Climate Compass. Additional environmental review under CEQA may be required for subsequent projects and would be generally based on the subsequent project's consistency with the Plan and the analysis in this SEIR, as required under CEQA. It may be determined that some future projects or activities under the Plan may be exempt from further environmental review. When subsequent projects or activities under the Plan are proposed, the City will examine the projects or activities to determine whether their effects were adequately analyzed in the General Plan EIR and this SEIR (CEQA Guidelines Section 15168(c)). If the projects or activities would have no effects beyond those disclosed in this SEIR, no further CEQA compliance would be required.

1.4 AGENCY ROLES AND RESPONSIBILITIES

The City is the lead agency responsible for approving the Climate Compass and for ensuring that the requirements of CEQA have been met. After the public review process for the SEIR is complete, the City Council will determine whether to certify the SEIR (see State CEQA Guidelines Sections 15090) and approve the Project.

A trustee agency is a State agency that has jurisdiction by law over natural resources that are held in trust for the people of the State of California. There are no trustee agencies applicable to the Climate Compass.

Responsible agencies are public agencies, other than the lead agency, that have discretionary-approval responsibility for reviewing, carrying out, or approving elements of a project. Responsible agencies should participate in the lead agency's CEQA process, review the lead agency's CEQA document, and use the document when making a decision on project elements. There are no agencies other than the City that have approval or permitting authority for the Project. However, implementation of the Project could involve many responsible agencies, depending on the details of a future project. The following are some of the agencies that could be required to act as responsible agencies for subsequent projects under the Plan:

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

1.5 PUBLIC AND ENVIRONMENTAL REVIEW PROCESS

The Notice of Preparation (NOP) for the Climate Compass was distributed for public review between December 6, 2024 and January 15, 2025. A public scoping meeting was held on January 9, 2025. The NOP is available at the City's website at https://www.elkgrove.gov/planning/environmental-review. The purpose of the NOP and the scoping meeting was to provide notification that the Draft SEIR for the Plan was being prepared and to solicit input on the scope and content of the environmental document. The NOP and comments obtained in response to the NOP are included in Appendix A of this Draft SEIR.

The City initiated consultation with tribal governments affiliated with the Planning Area in accordance with AB 52. In December 2024, the City sent consultation letters to the following tribes:

- Buena Vista Rancheria of Me-Wuk Indians;
- Calaveras Band of Mi-Wuk Indians;
- Chicken Ranch Rancheria of Me-Wuk Indians;
- Ione Band of Miwok Indians;
- Jackson Rancheria Band of Miwuk Indians;
- Nashville Enterprise Miwok-Maidu-Nishinam Tribe;
- Pakan'yani Maidu of Strawberry Valley Rancheria;
- United Auburn Indian Community of the Auburn Rancheria; and
- Wilton Rancheria.

The City did not receive any requests for tribal consultation in response to the AB 52 notification letters. As a result, no tribal cultural resources have been identified relative to the Plan.

This Draft SEIR is being circulated for public review and comment for a period of 45 days. During this period, comments from the general public as well as organizations and agencies on the environmental issues raised within the Draft SEIR may be submitted to the lead agency.

Upon completion of the public review and comment period for the Draft SEIR, a Final SEIR will be prepared that will include both written and oral comments on the Draft SEIR received during the public-review period, responses to those comments, and any revisions to the Draft SEIR made in response to public comments. The Draft SEIR and Final SEIR will comprise the SEIR for the Project.

Before adopting the Plan, the lead agency is required to certify that the SEIR has been completed in compliance with CEQA, that the decision-making body reviewed and considered the information in the SEIR, and that the SEIR reflects the independent judgment of the lead agency.

1.6 SCOPE OF THIS DRAFT SEIR

This Draft SEIR analyzes the potentially significant environmental impacts resulting from implementation of the Climate Compass. See Chapter 2, "Project Description," for a complete discussion of the proposed Plan, including the City's GHG emissions inventory, forecasts, and GHG emission reduction targets and how they align with State targets and goals. As a result of the review of existing information and the scoping process, this Draft SEIR includes an evaluation of the following two environmental issue areas as well as other CEQA-mandated issues (e.g., cumulative impacts, growth-inducing impacts, significant unavoidable impacts, alternatives):

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

Under the CEQA statutes and the State CEQA Guidelines, a lead agency may limit an EIR's discussion of environmental effects when such effects are not considered potentially significant (PRC Section 21002.1[e]; State CEQA Guidelines Sections 15128, 15143). Information used to determine which impacts would be potentially significant was derived from review of the Plan; review of applicable planning documents and CEQA documentation; feedback from public and agency consultation; and comments received on the NOP (see Appendix A of this Draft SEIR). Environmental issue areas determined not to warrant detailed analysis due to the nature of the Plan are discussed in greater detail in Chapter 3, "Environmental Setting, Impacts, and Mitigation Measures," of this Draft SEIR.

1.7 ORGANIZATION OF THIS DRAFT SEIR

This Draft SEIR is organized into chapters, as identified and briefly described below. Chapters are further divided into sections (e.g., Chapter 3, "Environmental Impacts and Mitigation Measures" and Section 3.1, "Energy"):

- The "Executive Summary": This chapter introduces the Project; provides a summary of the environmental review process, effects found not to be significant, and key environmental issues; and lists significant impacts and mitigation measures to reduce significant impacts to a less-than-significant level, if applicable.
- Chapter 1, "Introduction": This chapter provides a description of the lead and responsible agencies, the legal authority and purpose for the document, and the public review process.
- Chapter 2, "Project Description": This chapter describes the location, background, and goals and objectives for the Climate Compass Project, and describes the project elements in detail.
- Chapter 3, "Environmental Impacts": The sections in this chapter evaluate the expected environmental impacts generated by the Climate Compass, arranged by subject area (e.g., energy, GHG emissions and climate change). In each subsection of Chapter 3, the regulatory background, existing conditions, analysis methodology, and thresholds of significance are described. The anticipated changes to the existing conditions after implementation of the project are then evaluated for each subject area. For any significant or potentially significant impact that would result from Project implementation, mitigation measures are presented and the level of impact significance after mitigation is identified. Environmental impacts are numbered sequentially within each section (e.g., Impact 3.1-1, Impact 3.1-2, etc.). Any required mitigation measures are numbered to correspond to the impact numbering; therefore, the mitigation measure for Impact 3.1-2 would be Mitigation Measure 3.1-2. This chapter also identifies the environmental effects not found to be significant consistent with State CEQA Guidelines Section 15128.
- Chapter 4, "Cumulative Impacts": This chapter provides information required by CEQA regarding cumulative impacts that would result from implementation of the Climate Compass, as well as other past, present, and probable future projects.
- Chapter 5, "Alternatives": This chapter evaluates alternatives to the Climate Compass, including alternatives considered but eliminated from further consideration, the No Project Alternative, and two Plan alternatives, consisting of the Removal of Reach Codes Actions Alterative and the Transit Expansion Alternative. The environmentally superior alternative is identified.
- Chapter 6, "Other CEQA Sections": This chapter evaluates growth-inducing impacts, and irreversible and irretrievable commitment of resources, as well as discloses any significant and unavoidable adverse impacts.
- Chapter 7, "Report Preparers": This chapter identifies the preparers of the document.
- Chapter 8, "References": This chapter identifies the organizations and persons consulted during preparation of this Draft SEIR and the documents and individuals used as sources for the analysis.

1.8 STANDARD TERMINOLOGY

This Draft SEIR uses the following standard terminology:

- "No impact" means no change from existing conditions (no mitigation is needed).
- "Less-than-significant impact" means no substantial adverse change in the physical environment (no mitigation is needed).
- "Potentially significant impact" means a substantial adverse change in the environment that might occur (mitigation is recommended because potentially significant impacts are treated as significant).
- "Significant impact" means a substantial adverse change in the physical environment that would occur (mitigation is recommended).
- "Significant and unavoidable impact" means a substantial adverse change in the physical environment that would occur and that cannot be avoided, even with the implementation of all feasible mitigation.

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2 PROJECT DESCRIPTION

The proposed Climate Compass (Plan) is a comprehensive update to the City of Elk Grove's (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.

2.1 PROJECT BACKGROUND AND NEED

On February 27, 2019, the City adopted the General Plan and the 2019 CAP and certified the General Plan EIR (SCH No. 2017062058). Both the General Plan and 2019 CAP were programmatically evaluated within the General Plan EIR as separate documents.

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). The 2019 CAP included an updated communitywide emissions inventory for the General Plan Planning Area, along with updated emissions forecasts for 2020, 2030, and 2050 based on land use activities anticipated with implementation of the General Plan. In addition to the 2019 CAP, the General Plan EIR also evaluated the General Plan; amendments to the East Elk Grove Specific Plan, the East Franklin Specific Plan, and the Laguna Ridge Specific Plan; amendments to the Zoning Code to maintain consistency with the General Plan; and an update to the City's Parks and Recreation Master Plan.

The General Plan EIR concluded that while adoption of the General Plan and the 2019 CAP would primarily result in less than significant impacts related to GHG emissions and energy, significant and unavoidable impacts would occur under the General Plan EIR threshold, "Conflict with an Applicable Plan, Policy, or Regulation Adopted for the Purpose of Reducing the Emissions of GHGs" consistent with Appendix G of the State CEQA Guidelines. For this threshold, the General Plan EIR concluded significant and unavoidable impacts since the adoption and implementation of the General Plan and 2019 CAP would likely not result in sufficient GHG reductions for the city to meet the long-term GHG emission reduction goal for 2050 as stated in Executive Order (EO) S-3-05. The General Plan EIR also evaluated an alternative to the project that included additional measures to the 2019 CAP to further exceed established GHG reduction targets for 2020 and 2030 and allow the city to meet the State's targets for 2050. However, this alternative was not identified as the environmentally superior alternative as the General Plan EIR concluded that it would result in similar impacts, if not greater in certain instances, as the project.

Since its adoption in 2019, the 2019 CAP has been amended three times, including in December 2019 to update solar photovoltaic (PV) requirements (measure BE-7) to be consistent with the 2019 building code; in December 2022 to update electric vehicle (EV) charging requirements (measure TACM-9) to be consistent with the 2022 building code; and, most recently, in December 2024 to update EV charging requirements (measure TACM-9) to be consistent with the 2024 building code and to change the language of measure BE-5 to remove reference to the zero net energy standard for residential buildings and replace it with the decreased energy emissions requirement (City of Elk Grove 2024a). While the first two amendments to the 2019 CAP were exempt from CEQA in accordance with Section 15162 of the State CEQA Guidelines, a General Plan EIR addendum was approved by the City Council on December 11, 2024 for the December 2024 amendment to the 2019 CAP (City of Elk Grove 2024b). The General Plan EIR addendum determined that the December 2024 amendment to the 2019 CAP did not constitute substantial changes, did not change physical circumstances, and did not provide new information of substantial importance that could not have been known at the time of the 2019 CAP was approved and thus, would not result in a new or substantially more severe impact compared to the 2019 CAP as evaluated in the certified General Plan EIR (City of Elk Grove 2024b).

Since its adoption in 2019, the General Plan has been amended seven times, three times with Supplemental /Subsequent EIRs for the Housing and Safety Element Update, the Southeast Industrial Area Specific Plan, and most recently, the

General Plan Amendments and Update of Vehicle Miles Traveled (VMT) Standards Project (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) (SCH No. 2022020463). The GPAs/VMT Standards Project included amendments to the General Plan for the creation of the Livable Employment Area Community Plan Area; an update to the City's VMT thresholds, including associated changes to the Transportation Analysis Guidelines; revisions to the South and West Study Areas in the General Plan; incorporation of the Grant Line Road Precise Plan as part of the Rural Area Community Plan; for other land use changes; and amendments to the adopted General Plan Mitigation Measures MM 5.5.1a and MM 5.5.1b associated with cultural resource impacts.

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 associated with the creation of the Livable Employment Area Community Plan (LEA Community Plan). The intent of the LEA Community Plan is to connect transportation with land-use planning and design in recognition that the most economically, socially, and environmentally successful communities are walkable and contain a mix of uses. This land use change was directed in 2019 by the Elk Grove City Council to leverage the value of a planned new thoroughfare, Kammerer Road, beyond its ability to carry vehicle traffic, to lay the foundation for economic development in the form of a 21st century employment center. 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 (City of Elk Grove 2023:Table 3.9-3) as well as reduced per capita GHG emissions in 2040 (2.9 $MTCO_2e$ per year) as compared to what is identified in the 2019 CAP for 2050 (3.0 $MTCO_2e$ per year) (City of Elk Grove 2023:3.5-4 and 3.5-11). This updated version of the General Plan is the foundational land use plan used for the Climate Compass.

In 2023, the City initiated the development of the Climate Compass 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). The Plan was developed by first 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's consultant 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, the City and its consultants have 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 Climate Compass, which includes the city's GHG emission inventory, forecasts, and reduction targets; the finalized communitywide climate strategies and action; City operations strategies and actions; and the implementation framework for the Plan, has been released for public review concurrently with this Draft SEIR on the City's website: https://elkgrove.gov/cap. For a detailed timeline of the development of the Climate Compass, please refer to Chapter 1, "Introduction," of the Plan.

2.2 PROJECT OBJECTIVES

The primary objectives of the Plan are to:

- Develop an updated CAP to align the City's climate action planning with California's GHG reduction goals and relevant regulations aimed at climate mitigation.
- Implement strategies and actions to transition the city away from fossil fuels and realize deep GHG emissions reductions through the near- and long-term future.
- Connect and amplify existing sustainability efforts in a cohesive, impactful plan.
- Incorporate climate adaptation and resilience actions to address the city's most pressing natural and climate-related hazards.
- Develop a CEQA-qualified CAP to provide a mechanism for streamlining project-level GHG emissions analysis consistent with Section 15183.5 of the State CEQA Guidelines and the entitlement process for future sustainability projects and climate-friendly development within the city.

- Communicate climate challenges and opportunities, foster climate education, and empower the community to contribute to solutions.
- Ensure equitable climate action by prioritizing projects and programs that benefit historically underserved communities.
- Develop an updated CAP that is consistent with the recently adopted amendments to the City's General Plan in 2023, which was amended to increase development intensity to improve VMT efficiency and reduce GHG emissions by creating walkable communities with amenities that attract and retain businesses and residents.

2.3 PROJECT LOCATION

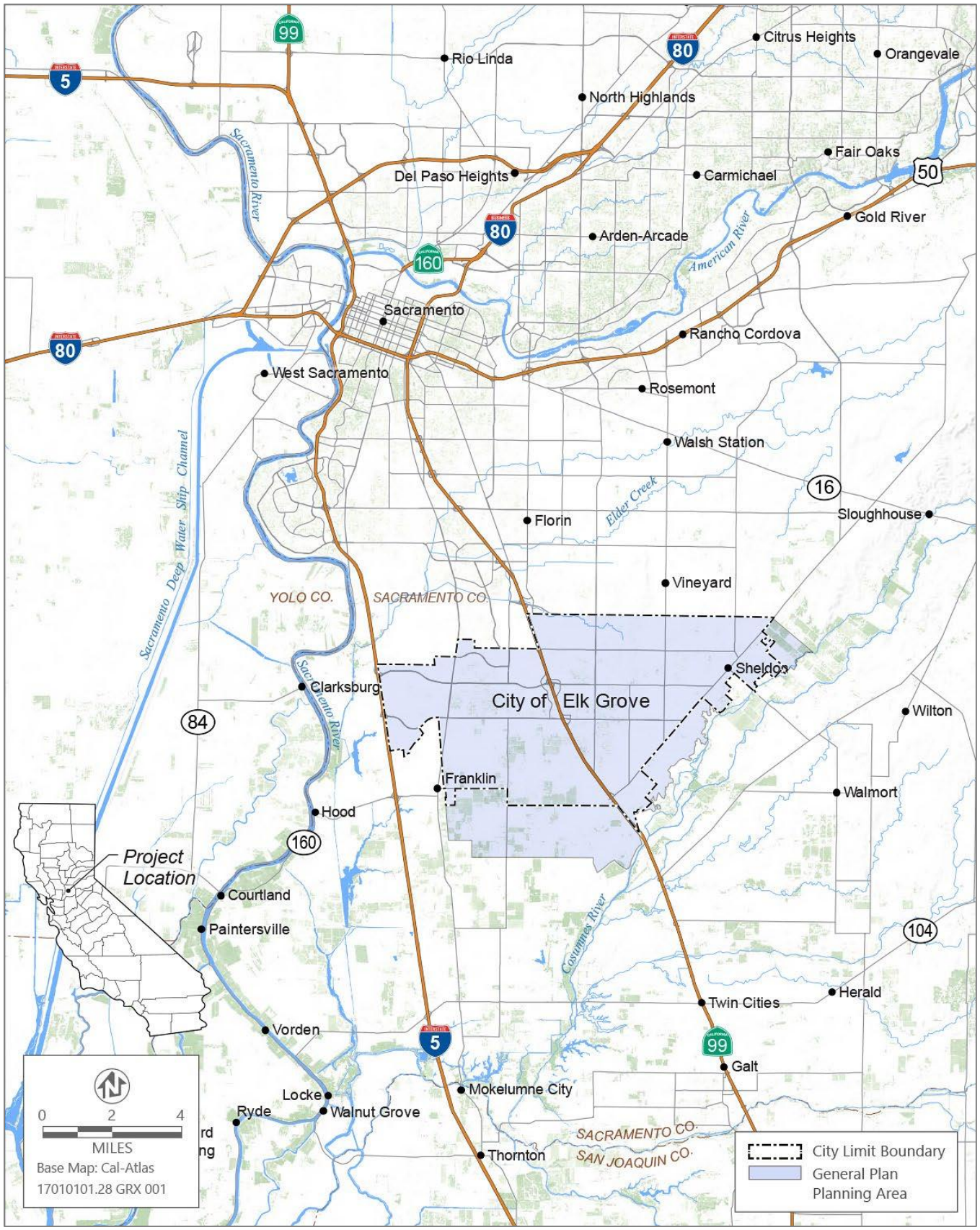
The General Plan established a Planning Area of approximately 31,238 acres (48.8 square miles), which includes all land within the current city limits as well as lands outside the city limits in unincorporated Sacramento County to the south and east that, in the City's judgement, bears relation to its planning efforts (referred to as study areas) (Figure 2-1). 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.

2.4 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.



Source: Ascent 2024.

Figure 2-1 Project Location

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.

Each key component of the Climate Compass is discussed in greater detail below.

2.4.1 Greenhouse Gas Emissions Inventory

2021 COMMUNITY GHG EMISSIONS INVENTORY

As discussed in Chapter 2, "Greenhous Gas Emissions Inventory, Forecasts, and Targets," of the Climate Compass, the foundation of the Plan is the community GHG emissions inventory, which identifies and quantifies the sources and quantities of GHG emissions generated from activities within the City's jurisdiction. Development of the community GHG emissions inventory provides the City an understanding of sources and quantities of GHG emissions currently being generated within the jurisdiction as well as allows reduction targets to be established and reduction measures to be quantified. In addition, the community GHG emissions inventory provides a framework to track emissions over time and assess the effectiveness of CAP implementation. The community GHG emissions inventory evaluated activities within the city in 2021, which was the most recent data available at the start of the Climate Compass development process in 2023.

The community GHG emissions inventory quantifies three primary GHGs [carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O)] across seven sectors: building energy, on-road transportation, off-road vehicles and equipment, solid waste, water supply, wastewater treatment, and agriculture (Table 2-1).

Table 2-1 Elk Grove Community GHG Emissions Sectors

Emissions Sector	Description
Building Energy	Emissions from the energy used to power, heat, and cool residential and commercial buildings.
On-Road Transportation	Emissions from cars, trucks, and other vehicles driving on roads in Elk Grove.
Off-Road Vehicles and Equipment	Emissions from vehicles and equipment used off-road, such as construction and landscaping equipment.
Solid Waste	Emissions from the disposal and decomposition of waste generated by the community.

Emissions Sector	Description
Water Supply	Emissions from the energy used to pump, treat, and distribute water used in Elk Grove.
Wastewater Treatment	Emissions from the processes and energy used to collect, treat, and discharge wastewater.
Agriculture	Emissions from farming activities, such as crop growth, livestock, and fertilizer use within Elk Grove.

Source: City of Elk Grove 2025: Table 2-1.

While CO_2 is the primary GHG emitted in California and is the most recognized GHG, CH_4 and N_2O are also addressed within the CAP. To simplify discussion of these emissions collectively, CAPs use a measurement known as carbon dioxide equivalent (CO_2e). The CO_2e measurement translates each GHG to CO_2 by weighting it by its relative global warming potential. For example, according to the Intergovernmental Panel on Climate Change, CH_4 and N_2O are 27.9 and 273 times more potent, respectively, than carbon dioxide in their ability to trap heat in the atmosphere (IPCC 2021). Converting these gases into CO_2e allows consideration of all the gases in comparable terms and makes it easier to communicate how various sources and types of GHG emissions contribute to global warming. A metric ton of carbon dioxide equivalent ($MTCO_2e$) is the standard measurement of the amount of GHG emissions produced and released into the atmosphere.

The GHG emissions inventory estimated community emissions were 1,039,181 $MTCO_2e$ in 2021 (Table 2-2). Most community GHG emissions in the city came from just two sectors: on-road transportation and building energy. On-road transportation, which includes cars, trucks, and other vehicles driving within the city, accounted for more than half (56 percent) of all GHG emissions. Building energy, which encompasses both residential and commercial buildings, made up another 38 percent of emissions. Together, these two sectors were responsible for 94 percent of the city's total community GHG emissions. The remaining 6 percent of community GHG emissions came from solid waste disposal, off-road vehicles and equipment, wastewater treatment, water supply, and agricultural activities within the city limits.

Table 2-2 2021 Elk Grove Community GHG Emissions Inventory

Sector	GHG Emissions ($MTCO_2e$)	Percent of Total
On-Road Transportation	586,220	56%
Building Energy (Includes Residential and Nonresidential)	398,365	38%
Solid Waste	20,222	2%
Off-Road Vehicles and Equipment	18,341	2%
Wastewater Treatment	2,957	<1%
Water Supply	2,802	<1%
Agriculture	10,275	1%
Total	**1,039,181**	**100%**

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

Source: City of Elk Grove 2025: Table 2-3.

Comparison of 2013 to 2021 Community GHG Emissions Inventories

In order to track community GHG emissions reduction efforts, the Climate Compass includes a comparison of the City's community GHG emissions inventories from 2013 and 2021 (Table 2-3). Table 2-3 presents the total community emissions for both inventory years by sector as well as the percent change in emissions from 2013 to 2021. It should be noted that a change in methodology related to how to calculate the community GHG emissions inventory occurred between the two inventory years, which has resulted in a more comprehensive calculation for certain sectors (i.e., On-Road and Off-Road Transportation and Agriculture) in the 2021 GHG emissions inventory.

Table 2-3 2013 and 2021 Elk Grove Community GHG Emissions Inventory Comparison

Sector	2013 GHG Emissions ($MTCO_2e$)	2021 GHG Emissions ($MTCO_2e$)	Percent Change 2013 to 2021
On-Road and Off-Road Transportation[1]	523,680	604,560	+15%
Building Energy	361,260	398,365	+10%

Sector	2013 GHG Emissions ($MTCO_2e$)	2021 GHG Emissions ($MTCO_2e$)	Percent Change 2013 to 2021
Solid Waste	26,260	20,222	-23%
Water Supply and Wastewater Treatment	7,177	5,759	-20%
Agriculture[2]	1,020	10,275	+907%
Total	**919,407**	**1,039,181**	**+13%**

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

[1] The increase in on-road transportation emissions is due to a change in the travel model used for each inventory, along with the methods to quantify emissions. The City saw an overall increase in vehicle miles traveled which exceeded the benefits of cleaner vehicles over the 9-year period.

[2] This significant increase is due to building energy from agricultural operations being included in the agriculture sector in the 2021 community inventory. The 2013 community inventory only included emissions from livestock management, fertilizer application, and agricultural equipment.

Source: City of Elk Grove 2025.

A per capita comparison for the 2013 and 2021 community GHG emissions inventories is also included in the Climate Compass (Table 2-4). This comparison accounts for the population growth the city experienced since 2013, which consists of an increase in residents, from 163,093 to 179,287. While the city's population increased by roughly 10 percent, community GHG emissions per capita only increased by 2.8 percent over the same period.

Table 2-4 2013 and 2021 Elk Grove Community GHG Emissions Inventory Per Capita Comparison

Sector	2013 GHG Emissions Per Capita ($MTCO_2e$)	2021 GHG Emissions Per Capita ($MTCO_2e$)	Percent Change 2013 to 2021
On-Road and Off-Road Transportation[1]	3.21	3.37	+5%
Building Energy	2.22	2.22	0%
Solid Waste	0.16	0.11	-30%
Water Supply and Wastewater Treatment	0.04	0.03	-27%
Agriculture[2]	0.01	0.06	+816%
Total	**5.64**	**5.80**	**+2.9%**

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

[1] The increase in emissions is due to a 29 percent increase in VMT from 2013 to 2021, as emissions factors for on-road transportation decreased between the two inventory years.

[2] This significant increase is due to building energy from agricultural operations being included in the agriculture sector in the 2021 community inventory.

Source: City of Elk Grove 2025.

2021 CITY OPERATIONS GHG EMISSIONS INVENTORY

As discussed in Chapter 4, "City Operations," in addition to the community GHG emission inventory, the Climate Compass also identified and quantified the sources and quantities of GHG emissions generated from City operations. Similar to the community GHG emissions inventory, the City operations GHG emissions inventory evaluated operation of government facilities and infrastructure within the city in 2021, which was the most recent data available at the start of the Climate Compass development process in 2023. The City operations GHG emissions inventory estimated GHG emissions in eight sectors: buildings and facilities, streetlights and traffic signals, employee commute, vehicle fleet, solid waste, water supply, wastewater treatment, and process and fugitive emissions (Table 2-5).

Table 2-5 Elk Grove City Operations GHG Emissions Sectors

Sector	Description
Buildings and Facilities	Emissions from electricity, natural gas, and diesel use in City-owned buildings, including parks and other facilities.
Streetlights and Traffic Signals	Emissions from electricity used to power streetlights and traffic signals.
Employee Commute	Emissions from fuel used by City employees commuting to and from work.
Vehicle Fleet	Emissions from fuel consumption in City-owned and operated on-road vehicles and off-road equipment.

Sector	Description
Solid Waste	Emissions from the decomposition of City operations-generated mixed and organic waste in landfills.
Water Supply	Emissions from electricity used to supply, treat, and distribute water for City operations.
Wastewater Treatment	Emissions from treating City operations-generated wastewater, including process emissions and energy use.
Process and Fugitive Emissions	Emissions from leakage in the natural gas distribution system.

Notes: GHG = greenhouse gas.

Source: City of Elk Grove 2025.

The GHG emissions inventory estimated GHG emissions generated by City operations were 4,275 $MTCO_2e$ in 2021 (Table 2-6). Buildings and facilities were the largest contributor at 41 percent of emissions, followed by streetlights and traffic signals (21 percent), employee commute (20 percent), and vehicle fleet (14 percent). The remaining sources (i.e., solid waste, water supply, wastewater treatment, and process and fugitive emissions) collectively accounted for about 4 percent of total emissions.

Table 2-6 2021 Elk Grove City Operations GHG Emissions Inventory

Sector	GHG Emissions ($MTCO_2e$)	Percent of Total
Buildings and Facilities	1,741	41%
Streetlights and Traffic Signals	893	21%
Employee Commute	835	20%
Vehicle Fleet	620	14%
Solid Waste	139	3%
Water Supply	9	<1%
Wastewater Treatment	7	<1%
Process and Fugitive Emissions	32	1%
Total	**4,275**	**100%**

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

Source: City of Elk Grove 2025.

Comparison of 2019 to 2021 City Operations GHG Emissions Inventories

In order to track how the City has been achieving its GHG emissions reduction efforts, the Climate Compass included a comparison of City operations GHG emissions inventories from 2019 and 2021, as 2019 was the most recent time a municipal inventory was completed. Table 2-7 presents the total emissions for each inventory year by sector as well as the percent change in municipal GHG emissions from 2019 to 2021.

Table 2-7 2019 and 2021 Elk Grove City Operations GHG Emissions Inventory

Sector	2019 GHG Emissions ($MTCO_2e$)	2021 GHG Emissions ($MTCO_2e$)	Percent Change 2019 to 2021
Buildings and Facilities[1]	643	1,741	+171%
Streetlights and Traffic Signals	617	893	+45%
Employee Commute	1,143	835	-27%
Vehicle Fleet	909	620	-32%
Solid Waste	83	139	+68%
Water Supply[2]	N/A	9	N/A
Wastewater Treatment	34	7	-80%
Process and Fugitive Emissions[3]	5	32	+540%
Total	**3,434**	**4,725**	**+25%**

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

[1] This increase is due to a higher electricity emissions factor and higher natural gas use in 2021 associated with new City facilities.

[2] This sector was not assessed in the 2019 City operations inventory.

[3] This increase is due to higher natural gas use in 2021 associated with new City facilities.

Source: City of Elk Grove 2025.

2.4.2 GHG Emissions Forecasts

GHG emissions forecasts are modeled estimates of future emissions levels based on current trends in activity, population, and job growth. These forecasts also account for known regulatory actions by federal and State agencies, which are expected to reduce GHG emissions in the future. Emissions forecasts provide insight into the scale of local GHG emissions reductions required to achieve targets, factoring in anticipated reductions from regulatory actions. The GHG emission forecasts consists of two scenarios: the "business-as-usual" (BAU) scenario and the "no local action" (NLA) scenario. The BAU forecast assumes that no new State or federal actions will be taken after 2021 to reduce GHG emissions. This scenario only accounts for growth factors that could affect emissions in each sector, such as population or employment changes. Conversely, the NLA scenario adjusts the BAU forecast to consider the impact of existing State and federal laws and regulations on the city's future GHG emissions.

COMMUNITY GHG EMISSIONS FORECASTS

Both the community BAU and NLA forecast scenarios provide estimates of the city's GHG emissions for the years 2030 and 2045, which align with the GHG reduction targets set by important State laws, such as SB 32 and AB 1279.

BAU Forecast

The community BAU forecast estimates GHG emissions based on assessing how emissions generated by community activities would change over time without federal, State, or local action. The community BAU forecast only includes expected employment and population changes in the future. Based on 2021 GHG emissions levels, this scenario estimates annual GHG emissions in the city will increase steadily and rise by approximately 28 percent in 2030, and 71 percent in 2045 (Table 2-8). While the community NLA forecast provides a more realistic scenario for future GHG emissions, the community BAU forecast offers the basis for understanding the GHG impact due to an anticipated increase in population, vehicle activity, and other growth factors within the city.

Table 2-8 Elk Grove Community GHG Emissions Inventory and BAU Forecasts ($MTCO_2e$)

Sector	2021	2030	2045
On-Road Transportation	586,220	718,743	926,109
Residential Building Energy	271,900	347,631	466,486
Nonresidential Building Energy	126,465	193,762	298,428
Solid Waste	20,222	26,034	36,165
Off-Road Vehicles and Equipment	18,341	25,296	36,158
Agriculture[1]	10,275	4,372	1,154
Wastewater Treatment	2,957	6,707	9,317
Water Supply	2,802	3,731	5,183
Total	**1,039,181**	**1,326,277**	**1,779,000**
Percent Change from 2021 Levels	-	28%	71%

Notes: Total may not sum exactly due to independent rounding. BAU = business-as-usual; GHG = greenhouse gas; $MTCO_2e$ = metric tons of carbon dioxide equivalent.

[1] Agricultural emissions are anticipated to decrease under the business-as-usual forecast because the acres in agricultural production in the city limits are anticipated to decrease over the coming decades.

Source: City of Elk Grove 2025.

NLA Forecast

The community NLA forecast evaluates how the city's GHG emissions would change over time, accounting for legislative actions at the federal and State levels, such as regulatory requirements to increase vehicle fuel efficiency (Table 2-9). This forecast scenario provides the City with the information needed to focus efforts on specific emissions sectors and sources with the most GHG reduction opportunities.

Table 2-9 Legislative Reductions Used in NLA Forecast

Source	Legislative Reduction	Description	Sector(s) Applied
State	SB 100 (The 100 Percent Clean Energy Act of 2018)	Requires that 60 percent of retail electricity sold in California must come from renewable or zero-carbon resources by 2030 and 100 percent by 2045.	Residential and Nonresidential Building Energy
State	SB 1020 (Clean Energy, Jobs, and Affordability Act of 2022)	Requires eligible renewable and zero-carbon energy resources to supply 90 percent of California's retail electricity sales by the end of 2035, 95 percent by the end of 2040, and 100 percent by the end of 2045. Additionally, it requires that 100 percent of electricity procured for state agencies come from these sources by the end of 2035.	Residential and Nonresidential Building Energy
State	California's Building Energy Efficiency Standards (2019 and 2022 Title 24, Part 6)	Effective January 1, 2023, new residential and nonresidential buildings in California must comply with energy efficiency standards set by the California Energy Commission. The 2022 standards require energy-efficient building practices focused on decarbonization, emphasizing the use of electric heat pumps for space and water heating, and promoting the integration of photovoltaic and battery storage systems along with other demand-flexible technologies to work with heat pumps.	Residential and Nonresidential Building Energy
State	Advanced Clean Car I Regulations	Establishes GHG emission reduction standards for model years 2017 through 2025 that are more stringent than federal CAFE standards.	On-Road Transportation
State	Advanced Clean Cars II Regulations[1]	Establishes a target for all new passenger cars, trucks, and SUVs sold in California to be 100 percent zero-emission vehicles by 2035.	On-Road Transportation
State	Advanced Clean Fleets[2]	Starting in 2036, all medium- and heavy-duty trucks used in local government fleets in California must be zero emissions with limited exceptions. In addition, local government fleet owners must also purchase electric trucks on an accelerated timeline.	On-Road Transportation
State	Truck and Bus Regulation	Requires diesel trucks and buses that operate in California to be upgraded to reduce GHG emissions.	On-Road Transportation
Federal	Fuel Efficiency Standards for Medium- and Heavy-Duty Vehicles	Establishes fuel efficiency standards for medium- and heavy-duty engines and vehicles.	On-Road Transportation
Federal	EPA Off-Road Compression-Ignition Engine Standards	Establishes standards for phasing of EPA diesel engine tiers for off-road compression-ignition equipment.	Off-Road Vehicles and Equipment

Notes: CAFE = Corporate Average Fuel Economy; EPA = US Environmental Protection Agency; GHG = greenhouse gas; SB = Senate Bill.

[1] As of June 2025, the U.S. Congress voted to limit California's authority to regulate vehicle emissions under existing programs provided through a waiver of the Clean Air Act. California is challenging the legality of this vote and given the pending litigation, the assumption of these programs remains for the purpose of the Elk Grove *Climate Compass*.

[2] On January 13, 2025, CARB withdrew its request for a waiver and authorization for the addition of the Advanced Clean Fleets (ACF) Regulation to its emissions control program. As of June 2025, CARB is evaluating next steps and is not enforcing the existing portions of the ACF Regulation that require a federal waiver or authorization, such as the portions of the ACF Regulation that apply to high priority and drayage fleets. However, not all elements of the ACF Regulation require a federal waiver or authorization and the State and local government fleets portion of the ACF Regulation remains unaffected. The ACF Regulation is only applied to the City of Elk Grove government operations' emissions forecast.

Source: City of Elk Grove 2025.

Accounting for the legislative reductions described in Table 2-9, the NLA forecast indicates that the City's community GHG emissions are expected to decline from 2021 levels through 2045 (Table 2-10). It is important to note that legislative reductions are constantly evolving, so the NLA forecast is from a specific point in time and are likely to change.

Table 2-10 Elk Grove Community GHG Emissions Inventory and NLA Forecast ($MTCO_2e$)

Sector	2021	2030	2045
On-Road Transportation	586,220	449,118	166,840
Residential Building Energy	271,900	299,782	178,777
Nonresidential Building Energy	126,465	152,746	55,643
Solid Waste	20,222	26,034	36,165
Off-Road Vehicles and Equipment	18,341	25,296	36,158
Agriculture	10,275	3,869	575
Wastewater Treatment	2,957	6,707	9,317
Water Supply	2,802	2,875	0
Total	**1,039,181**	**966,427**	**483,475**
Percent Change from 2021 Levels	-	-7%	-53%

Notes: Total may not sum exactly due to independent rounding. BAU = business-as-usual; GHG = greenhouse gas; $MTCO_2e$ = metric tons of carbon dioxide equivalent.

Source: City of Elk Grove 2025.

CITY OPERATIONS GHG EMISSIONS FORECASTS

The following BAU and NLA forecasts provide estimates of the City's operational GHG emissions for the years 2030 and 2045 using the 2021 City operations GHG inventory baseline.

BAU Forecast

The City operations BAU forecast estimates GHG emissions for all sectors based on predicted growth in City employment (Table 2-11). This forecast scenario assumes the continuation of current behaviors and activities within City operations and that no additional efforts or legislative actions beyond what has already been implemented would be made to reduce GHG emissions in the future. The City operations BAU forecast estimates GHG emissions would increase through 2045, given no further GHG reduction efforts beyond 2021.

Table 2-11 Elk Grove City Operations GHG Emissions Inventory and BAU Forecasts (Annual $MTCO_2e$)

Sector	2021	2030	2045
Buildings and Facilities	1,741	2,304	2,987
Streetlights and Traffic Signals	893	1,136	1,532
Employee Commute	835	1,104	1,432
Vehicle Fleet	620	820	1,064
Solid Waste	139	184	239
Water Supply	9	12	16
Wastewater Treatment	7	8	11
Process and Fugitive Emissions	32	42	55
Total	**4,275**	**5,611**	**7,334**
Percent Change from 2021 Levels	—	+31%	+72%

Notes: Total may not sum exactly due to independent rounding. BAU = business-as-usual; GHG = greenhouse gas; $MTCO_2e$ = metric tons of carbon dioxide equivalent.

Source: City of Elk Grove 2025.

NLA Forecast

The NLA scenario forecasts GHG emissions for City operations, accounting for employment growth and the legislative actions at the State and federal levels, is summarized in Table 2-9. This forecast helps the City prioritize GHG emissions sectors and sources when developing strategies and actions for operational GHG emissions reduction. Accounting for State and federal legislative actions, GHG emissions from City operations are expected to slightly increase by 2030 with the city's rapid population growth and then decline by 2045 as anticipated reductions from regulations will outpace expected city growth (Table 2-12).

Table 2-12 Elk Grove City Operations GHG Emissions Inventory and NLA Forecasts (Annual $MTCO_2e$)

Sector	2021	2030	2045
Buildings and Facilities	1,741	2,054	1,588
Streetlights and Traffic Signals	893	907	0
Employee Commute	835	769	201
Vehicle Fleet	620	578	646
Solid Waste	139	184	239
Water Supply	9	9	0
Wastewater Treatment	7	7	3
Process and Fugitive	32	42	55
Total	**4,275**	**4,550**	**2,732**
Percent Change from 2021 Levels	—	*+6%*	*-36%*

Notes: Total may not sum exactly due to independent rounding. BAU = business-as-usual; GHG = greenhouse gas; $MTCO_2e$ = metric tons of carbon dioxide equivalent.

Source: City of Elk Grove 2025.

2.4.3 GHG Emissions Reduction Targets

The Climate Compass includes GHG emissions reduction targets consistent with State GHG targets as set by applicable State legislation (i.e., SB 32 and AB 1279) and the 2022 Scoping Plan. SB 32 requires the State to develop and implement a strategy for achieving a statewide GHG emissions reduction target 40 percent below 1990 levels by 2030. AB 1279 requires the State to develop and implement a strategy for achieving a statewide GHG emissions reduction target of 85 percent below 1990 levels for anthropogenic emissions[1], as well as net zero GHG emissions by 2045 or sooner and net negative emissions thereafter. As directed in SB 32 and AB 1279, the State aims to reduce annual GHG emissions to:

- 40 percent reduction below 1990 levels by 2030 (target per SB 32);
- 85 percent reduction in anthropogenic emissions below 1990 levels by 2045 (target per AB 1279); and
- net zero GHG emissions by 2045 (target per AB 1279).

The 2022 Scoping Plan showed that to meet these ambitious targets by 2045, a steeper reduction for interim years is required compared to under SB 32. The 2022 Scoping Plan showed that if statewide GHG emissions reductions are to remain on a trajectory of 85 percent reduction by 2045, statewide emissions must be reduced by 48 percent below 1990 levels by 2030.

Because 1990 GHG emissions data are not available for the city, the Climate Compass' GHG emissions reduction targets were developed relative to the 2021 GHG emissions inventory and established in proportion with statewide reduction for all emissions sectors relevant to the City's jurisdiction, consistent with CARB guidance (refer to Section 2.4.1, "GHG

[1] "Anthropogenic emissions" are GHG emissions caused by human activities. These activities include the burning of fossil fuels, deforestation, land use and land use changes, livestock production, fertilization, waste management, and industrial processes.

Emissions Inventory"). Estimating equivalent reductions needed from the 2021 baseline, the city's GHG emissions reduction targets aim to reduce emissions to:

- 39 percent below 2021 levels by 2030 (638,812 $MTCO_2e$); and
- 85 percent below 2021 levels by 2045 (160,976 $MTCO_2e$).

Refer to Chapter 2, "Greenhouse Gas Emissions Inventory, Forecasts, and Targets," and Chapter 4, "City Operations," of the Climate Compass for a detailed description on the methodology of determining the community and City operations GHG emissions reduction targets.

2.4.4 GHG Emissions Reduction Strategies and Actions

The Climate Compass includes strategies and actions intended to reduce the amount of GHG emissions occurring within the city and from City operations as well as to address the city's most pressing natural and climate-related hazards. To be effective and meet the city's GHG emissions reduction targets, these strategies and actions must be within the City's jurisdiction to implement and must supplement existing regulations from the federal or State government, be achievable, and be capable of being monitored for progress over time with clear pathways and metrics for helping City staff achieve determined GHG reduction levels within the timeline of established targets.

The following strategies and actions include implementing actions that result in quantifiable reductions of GHG emissions that provide other co-benefits such as improved community equity and resilience, improved community health and air quality, enhanced infrastructure reliability, and increased economic diversity.

COMMUNITY GHG EMISSIONS REDUCTION STRATEGIES AND ACTIONS

In order to determine whether State and federal regulations alone are sufficient to achieve the community GHG emissions reduction targets, a GHG emissions gap analysis was conducted to determine if additional local actions are required to achieve the GHG emissions reduction targets (Tables 2-13). The city's 2030 target requires community GHG emissions to be reduced by 327,615 $MTCO_2e$ in 2030. The 2045 target requires that community emissions be reduced by 322,498 $MTCO_2e$.

Table 2-13 Elk Grove Community GHG Emissions Gap Analysis ($MTCO_2e$)

	2021	2030	2045
BAU Emissions	1,039,181	1,326,277	1,779,000
NLA Emissions	1,039,181	966,427	483,474
Target Percent below 2021 Levels	N/A	39%	85%
Target Annual Emissions	N/A	638,812	160,976
Emissions Gap	N/A	327,615	322,498

Notes; BAU = business-as-usual; GHG = greenhouse gas; $MTCO_2e$ = metric tons of carbon dioxide equivalent; N/A = not applicable.

Source: City of Elk Grove 2025.

In order to achieve the community GHG emissions reduction targets, the Plan includes 21 strategies centered around six focus areas and are further supported with specific actions defining activities, programs, policies, community partnerships, or projects the City would implement to achieve GHG mitigation and adaptation goals (Table 2-14). In addition, where quantifiable, measurable outcomes are also provided on a strategy-by-strategy basis to serve as milestones for the City to achieve their community GHG emissions reduction goals for 2030 and 2045. The community GHG reduction strategies and actions are summarized below.

Buildings and Energy

The buildings and energy sector accounts for 38 percent of Elk Grove's total community GHG emissions, where 68 percent of building and energy emissions come from residential buildings and 32 percent from nonresidential buildings.

The proposed Plan addresses the buildings and energy sector by including strategies and associated actions that reduce energy use from both new and existing buildings. New residential development offers opportunities to incorporate energy-efficient designs and all-electric systems from the design phase while practical retrofit solutions and energy efficiency upgrades are essential for existing residential developments. Similarly, new commercial development can integrate advanced energy systems during the planning phase, while older commercial and industrial buildings require targeted strategies to reduce energy consumption through retrofitting and upgrades. While State legislation will support emissions reductions in the buildings and energy sector, implementation of the Climate Compass would require Elk Grove to adopt forward-looking building standards and collaborating with SMUD, which would promote a low-carbon built environment that supports more livable, resilient, and affordable communities while helping the City to meet its 2030 and 2045 GHG targets.

Transportation

The transportation sector is Elk Grove's largest source of GHG emissions, making up 58 percent of total community emissions. On-road vehicles contribute 56 percent of communitywide emissions and off-road sources contribute 2 percent. VMT is a primary driver of on-road transportation emissions as how far people travel often depends on community design and the transportation options available. The Climate Compass strategies and associated actions aim to reduce reliance on driving by encouraging more compact, connected development, expanding reliable public transit, and creating safer, more inviting streets for walking and biking. In addition to reducing VMT, these strategies and associated actions also support a transition to cleaner vehicles by expanding the City's EV charging network, providing EV incentives, and addressing emissions from off-road vehicles and equipment.

In addition, the proposed Plan includes strategies and associated actions that require collaboration across agencies and levels of government, including but not limited with the Sacramento Regional Transit District (SacRT) and Elk Grove Unified School District (EGUSD), to expand transit access, improve safety on routes to school, and increase EV charging at homes and community hubs. While State policies and emerging technologies will help improve vehicle efficiency, implementation of the Climate Compass would help to reduce car dependency and shaping a more sustainable transportation system within the city.

Resilience and Adaptation

While the resilience and adaptation strategies are not directly reflected in the City's community GHG emissions inventory and forecast, they offer benefits that strengthen community wellbeing. Building resilience means enhancing the City's ability to prepare for, respond to, and recover from climate hazards, particularly for vulnerable populations who face disproportionate impacts. The proposed Plan's resilience and adaptation strategies and associated actions include improving emergency response systems, strengthening infrastructure, and implementing natural solutions such as expanding urban forests and green stormwater management. These strategies and associated actions address immediate risks while building long-term capacity to withstand climate challenges. By prioritizing adaptation now, the City can avoid costly damages and future disruptions, improving quality of life and protecting infrastructure, community health, economic stability, and natural systems across the city.

Resource Consumption

Resource consumption in the city focuses on how materials and natural resources are used, managed, and ultimately discarded or reused. The resource consumption sector accounts for a relatively small portion of the city's community GHG emissions, roughly 2 percent from solid waste and less than 1 percent from water use. Sustainable resource management is essential to building a resilient community. By rethinking how materials flow through our economy and daily lives, the City can reduce environmental effects while creating value from what was previously considered waste. California's SB 1383 is a critical mandate in this effort, requiring jurisdictions to reduce organic waste disposal by 75 percent and recover 20 percent of edible food for human consumption by 2025. This regulation drives many of the City's waste diversion strategies while also supporting the transition to more circular systems, where materials maintain their highest utility through repeated use cycles. The Climate Compass includes strategies and associated actions that promote implementing more efficient resource management strategies, such as increased organic waste diversion, increased circular economy, and water conservation measures.

Green Economy

Similar to resilience and adaptation strategies, green economy strategies are not directly reflected in the City's community GHG emissions inventory and forecast, but they offer benefits that strengthen community wellbeing and economic resilience. The Climate Compass includes strategies and associated actions that support transitioning to a green economy, including supporting green businesses to make the city more attractive to innovative companies, create quality local jobs, and develop a workforce skilled in sustainable practices. Although green economy strategies may not directly reduce GHG emissions, they are essential for building the foundation that enables and accelerates climate action across all sectors. This approach recognizes that as California continues its transition away from fossil fuels, communities that proactively invest in green industries will be better positioned for long-term economic resilience. A green economy removes barriers to sustainable business development, connects local businesses with resources and recognition programs, and ensures that economic opportunities in emerging green sectors are accessible to all residents.

Climate Action Commitment

While other sections focus on technical solutions and policy frameworks, the climate action commitment strategies and associated actions emphasize that meaningful climate action ultimately relies on community awareness, engagement, and consistent tracking. Implementation of these strategies and associated actions promote thoughtfully designed outreach, education, and tracking key performance indicators to allow the City to monitor the success of the Climate Compass within the community.

Table 2-14 Elk Grove Community GHG Emissions Reduction Strategies Actions, and Measurable Outcomes

Strategy	Action
Buildings and Energy (BE)	
Strategy BE-1: Electrify and Decarbonize Buildings Measurable Outcomes - 50% of new residential development all electric by 2030 and 100% by 2045. - 50% of new nonresidential development all electric by 2030 and 100% by 2045. - 14% of existing residential buildings retrofitted to be all electric by 2030 and 68% by 2045. - 9% of existing nonresidential buildings retrofitted to be all electric by 2030 and 46% by 2045. - 2,778 low-income housing units replace gas-powered HVAC units with heat pumps HVAC and heat pump water heaters by 2030. - 27% of existing single-unit residential install heat pumps when replacing air conditioners by 2030 and 100% by 2045.	**Action BE-1.1:** Adopt by ordinance a new building reach code based on cost-effectiveness studies, stakeholder outreach, and California Energy Commission approval that must be met by all residential and nonresidential new construction and major renovations. **Action BE-1.2:** Develop a comprehensive building energy retrofit plan to transition existing residential and nonresidential buildings to all-electric. **Action BE-1.3:** Explore partnerships with regional organizations or grant opportunities to develop a funding mechanism (e.g., revolving loan fund, grant program) to provide low-interest loans to low-income residents to cover the time-of-replacement/emergency replacement of water heaters and/or HVAC units with electric options. **Action BE-1.4:** Partner with SMUD to explore offering on-bill financing or pay-as-you-save programs specifically for building electrification projects. **Action BE-1.5:** Adopt voluntary CALGreen measures that encourage heat pump space conditioning installations when air conditioners are replaced in existing single-unit residential.
Strategy BE-2: Increase Density and Expand Affordable Housing Measurable Outcomes - 11% reduction in VMT along major transit corridors due to increased density by 2030, continuing through 2045.	**Action BE-2.1:** Prepare and adopt land use plan and zoning revisions that increase the allowed density and intensity of development along the city's major transit corridors.

Strategy	Action
Strategy BE-3: Increase Local Renewable Energy Use and Storage Measurable Outcomes - 100% carbon-free electricity for all end uses in the city by 2030, continuing through 2045.	**Action BE-3.1:** Support and coordinate with SMUD in executing its 2030 Zero Carbon Plan. **Action BE-3.2:** Partner with SMUD to expand and strengthen existing participation incentives for their Virtual Power Plant Pilot Program, where customers' private solar and battery storage systems can be aggregated and utilized as a renewable, resilient, and reliable backup power supply during emergencies or peak demand periods.
Strategy BE-4: Reduce Energy Consumption and Energy Burden Measurable Outcomes - Not quantified	**Action BE-4.1:** Establish a program that connects owners and occupants of residential and nonresidential buildings to existing energy audit and weatherization programs (e.g., California's Low-Income Weatherization Program) and resources, and additionally, helps to determine eligibility. **Action BE-4.2:** Partner with SMUD to promote and expand upon their Home Performance Program, which bundles various residential energy efficiency upgrades (e.g., heating and cooling systems, heat pump water heaters, air sealing, and insulation) to deliver more savings, comfort, and rebate options. **Action BE-4.3:** Coordinate with SMUD to promote their Energy Assistance Program Rate for low-income residential customers, which provides a monthly discount on a qualified customer's energy bill, to ensure all eligible residents are enrolled at this rate.
Transportation (TR)	
Strategy TR-1: Decrease Vehicle Miles Traveled Measurable Outcomes - 45 miles of new sidewalks installed by 2030. - 50 miles of new bike lanes installed by 2030. - 147 miles of new bike lanes installed by 2045. - 2.3% VMT reduction achieved by 2030 through transit system upgrades and 15% VMT reduction by 2045. - 1% reduction in commute VMT achieved by 2030 through the development of local Transportation Management Agency, continuing through 2045.	**Action TR-1.1:** Implement the infrastructure, programmatic, and policy recommendations included in the Bicycle, Pedestrian, and Trails Master Plan. **Action TR-1.2:** Coordinate with Sacramento Regional Transit (SacRT) to improve the city's public transit system by increasing reliability and accessibility as well as by adding amenities such as seating, lighting, tree cover, and real-time arrival information displays. Extend service hours and routes to better serve residential areas, employment centers, and popular destinations, with a focus on "Transportation-Based Priority Populations" as identified by Caltrans' Transportation Equity Index. **Action TR-1.3:** Develop a local Transportation Management Agency, which works with residences and businesses to provide education on transit and alternative transportation services and programs, and provides other supportive programs that work to reduce VMT. **Action TR-1.4:** Expand an electric bike (e-bike) incentive program to encourage residents to purchase and use e-bikes for commuting and local trips instead of driving. Incentives will be provided as subsidies or discounts on e-bike purchases. **Action TR-1.5:** Partner with Elk Grove Unified School District (EGUSD) to establish and better monitor Safe Routes to School programs aimed at promoting safe walking, biking, and other active transportation modes for students and families. **Action TR-1.6:** Work with existing multi-unit building owners and require new multi-unit developments to install e-bike charging and secure bicycle parking in multifamily residential developments. **Action TR-1.7:** Develop public awareness campaigns promoting the benefits of active transportation, public transit, and ridesharing. **Action TR-1.8:** Identify opportunities to create new ingress and egress pathways for bicycles and pedestrians within existing residential subdivisions. Require new developments to double the number of pathways compared to current standards.

Strategy	Action
Strategy TR-2: Increase Zero-Emission Vehicle (ZEV) Adoption Measurable Outcomes - Transition to 25% light-duty electric and plug-in hybrid electric vehicles by 2030 and 87% by 2045. - Increase commercial EVs by 65% by 2030 and by 90% by 2045.	**Action TR-2.1:** Adopt a reach code for EV charging to meet CALGreen Tier 1 requirements to require new commercial development to equip parking spaces with EV charging receptacles. **Action TR-2.2:** Conduct a citywide study to identify optimal locations for public and multifamily residential EV charging stations based on traffic patterns, proximity to major destinations, equity, and existing electrical infrastructure. **Action TR-2.3:** Formalize a partnership with SMUD to collaborate on EV infrastructure planning, defining shared goals, responsibilities, and a framework for coordinating EV infrastructure planning, rate structures, incentive programs, and educational initiatives. **Action TR-2.4:** Require new publicly accessible (non-car-lock) fueling stations to install one DC fast charger for each two fuel dispenser positions. This requirement may also satisfy the EV charger requirements for any on-site convenience store. **Action TR-2.5:** Partner with SMUD to promote ZEVs and provide information on available incentives.
Strategy TR-3: Reduce Off-Road Transportation Emissions Measurable Outcomes - Require 100% of diesel-powered construction equipment to use renewable diesel in 2030 and 2045. - 5% of gas-powered landscaping equipment replaced with zero-emission alternatives every year through 2035.	**Action TR-3.1:** Require all construction projects starting in 2026 and later to use renewable diesel in diesel-powered construction equipment. **Action TR-3.2:** Prohibit the use of fossil-fuel-powered generators at construction sites in all discretionary projects. **Action TR-3.3:** Provide vouchers to business owners (e.g., landscaping businesses) to convert or replace their gasoline-powered gardening equipment, such as lawnmowers, leaf blowers, and hedge trimmers, with electric or other zero-emission alternative equipment. Work with waste collectors and Sacramento Metropolitan Air Quality Management District (SMAQMD) to ensure proper disposal and/or reuse of gasoline-powered landscaping equipment.
Resilience and Adaptation (RA)	
Strategy RA-1: Improve Climate and Emergency Preparedness Measurable Outcomes - Not quantified	**Action RA-1.1:** Adopt an ordinance for post-disaster recovery and reconstruction that includes provisions for debris clearance, damage assessment, demolitions, re-occupancy and building moratorium criteria, fee waivers and deferrals, for repair and reconstruction. **Action RA-1.2:** Utilize the "Sacramento Ready" website as a local climate resilience toolkit, partnering with Sacramento County Office of Emergency Services (SacOES), local businesses, and CBOs to distribute informational materials (pertaining to climate and emergency preparedness) to residents, which would be available in multiple languages and include specific considerations for those who may be more vulnerable (e.g., children, individuals with access and functional needs), along with keeping one's home or business safe.
Strategy RA-2: Build Capacity for Current and Future Flooding Measurable Outcomes - Not quantified	**Action RA-2.1:** Coordinate with Cosumnes Community Services District (CCSD) to identify potential locations for future large-scale, low-maintenance rain or pollinator gardens within the city (emulating the Elk Grove Rain Garden Plaza across from Colton Park), which can provide a range of benefits, such as reduced flooding, improved water quality, improved aesthetics, and being utilized as wildlife habitat. **Action RA-2.2:** Continue to implement and work with developers to update as needed, the Storm Drainage Master Plan (SDMP) and ensure that candidate watershed projects and future development proposals associated with the City's storm drainage and flood control collection system are consistent with the City objectives.
Strategy RA-3: Protect Populations from Wildfire Smoke Measurable Outcomes - Not quantified	**Action RA-3.1:** Coordinate with the SMAQMD, and other local and regional agencies and organizations to develop a strategy for the widespread awareness and adoption of mobile applications (e.g., Smoke Spotter, AirNow), which can help populations prepare for wildfire smoke events. **Action RA-3.2:** In partnership with Sacramento County Public Health and SMAQMD, develop a policy with established criteria and procedures to distribute N95 masks during or in anticipation of wildfire smoke events or prolonged periods of poor air quality.

Strategy	Action
Strategy RA-4: Reduce Exposure to Extreme Heat and Mitigate the Urban Heat Island Effect Measurable Outcomes - 1% of existing residential units install radiant barriers or cool roofs when re-roofing by 2030, continuing through 2045.	**Action RA-4.1:** Evaluate and consider establishing requirements for the use of heat mitigation measures in the public realm, particularly in common community gathering spaces (e.g., playgrounds, parks). Requirements may include the incorporation of: (1) building design features (e.g., varied building heights; setbacks from sidewalks; vertical and horizontal shade features); (2) cooling materials, treatments, and coatings (e.g., for rooftops); (3) multiple layers of shading to maximize coverage throughout the day; and (4) street trees and landscaping. **Action RA-4.2:** Develop and implement a cool pavement "roadmap" to expand the use of cool pavement across the city. The roadmap will identify pilot locations, potential funding sources, and performance-tracking mechanisms. **Action RA-4.3**: Establish a program to assist and incentivize residential and nonresidential building owners in retrofitting existing buildings with cool roofs or green roofs, underscoring the array of co-benefits they have to offer aside from mitigating the urban heat island effect, such as reduced energy costs. As part of the program, consider developing guidelines and linking to an array of external resources for proper maintenance and responsible disposal. **Action RA-4.4:** Partner with SacRT to study the feasibility of designing and installing bus shelters that offer protection and relief from heat, considering an array of measures and features. **Action RA-4.5:** Seek funding to further implement heat-mitigating public amenities, such as drinking fountains, water mister/spray areas, and shade structures in parks and other community gathering areas throughout the city, in collaboration with CCSD, EGUSD, and other appropriate partners.
Strategy RA-5: Expand the Urban Tree Canopy Measurable Outcomes - 953 trees must be planted annually by 2030 through 2045.	**Action RA-5.1:** Adopt an ordinance to require new development to plant an appropriate number of trees on site to provide a 50 percent canopy cover over parking surfaces and a 20 percent canopy cover over the remainder of the site. Exemptions to the ordinance may be provided in cases where tree canopy may conflict with solar photovoltaic system siting on the development site, LID features, when conflicting with the Solar Shade Control Act, or on a case-by-case basis for industrial locations. **Action RA-5.2:** Develop and adopt an Urban Forest Master Plan to sustainably manage and increase tree canopy across the city, which includes or identifies: (1) potential new tree planting sites with a priority emphasis on areas with low canopy coverage (i.e., under 15 percent); (2) native tree species and design guidelines; and (3) best practices in watering and maintenance practices, along with street and park tree preservation. **Action RA-5.3:** In coordination with the Sacramento Tree Foundation (STF), develop and annually update a work plan to identify and budget for specific tree planting and maintenance projects for implementation each year consistent with the goals and targets of the Citywide Urban Forest Master Plan. **Action RA-5.4:** Consider updates to the Tree Preservation and Protection Regulations to improve effectiveness and ensure enhancement of tree canopy. **Action RA-5.5:** Continue to partner with STF to strengthen the city's public and private tree canopy through the increased usage and/or expansion of existing programs, such as "Sacramento Shade," which currently offers a free landscape assessment and up to 10 free shade trees for SMUD customers (e.g., homeowners, renters, and businesses), among other programs

Strategy	Action
Strategy RA-6: Expand Nature-Based Solutions Measurable Outcomes - Not quantified	**Action RA-6.1:** Encourage EGUSD to identify opportunities for schoolyard and campus greening projects. Enhance integration of schoolyard greening efforts with environmental education curricula to foster environmental awareness and engagement among students. **Action RA-6.2:** Investigate opportunities to establish new parks, greenways, and trail networks to connect existing green spaces and ensure all residents have access to nature. **Action RA-6.3:** Explore incentivizing climate smart land management in the rural area of the city. **Action RA-6.4:** Evaluate rural lands for current and historical carbon storage (including mapping and modeling), the potential for future carbon sequestration with restoration, avoided conversion, or management, and the stability of the stored carbon and risk of carbon loss due to climate change or land use change.
Resource Consumption	
Strategy RC-1: Increase Organic Waste Diversion Measurable Outcomes - Achieve a citywide waste diversion target of 80% by 2030 and by 95% by 2045.	**Action RC-1.1:** Expand the City's existing organic recycling program for multifamily complexes, schools, and commercial businesses, by increasing access to centralized organic waste dumpsters and providing resources for implementing and/or improving source separation of food waste. **Action RC-1.2:** Develop an edible food recovery program that encourages food generators (e.g., grocery stores, restaurants, and food service distributors) to execute private agreements with qualified food recovery organizations. **Action RC-1.3:** Encourage residents and businesses to actively participate in the City's food waste recycling program through increased education and outreach.
Strategy RC-2: Promote a Circular Economy Measurable Outcomes - Not quantified	**Action RC-2.1:** Use the Sacramento County waste characterization study to provide information or actionable recommendations for waste reduction and diversion of residents and businesses in Elk Grove. **Action RC-2.2:** Advance opportunities for reusing, repurposing, and sharing durable goods through partnering with the Sacramento Public Library to expand the Library of Things Program, providing information to residents and businesses related to relevant online platforms (e.g., Buy Nothing, TooGoodToGo, Olio, Vinted, etc.) and increasing public awareness of the Reuse Room at the SWCC. **Action RC-2.3:** Continue to incentivize residents and businesses to reduce the amount of waste they generate and send to landfills through waste collection fee adjustments that increase fees for solid waste containers and do not charge fees for additional recycling and organic waste containers that are included in garbage service. **Action RC-2.4:** Perform a Circular Economy Baseline Assessment of the City's existing waste streams, resource flows, and economic activities to identify opportunities for infrastructure, projects, and materials to be maintained as long as possible and identify areas with the highest potential for circularity.
Strategy RC-3: Reduce Water Use Measurable Outcomes - Reduce water consumption by 5% by 2030 and by 20% by 2045.	**Action RC-3.1:** Expand the use of recycled water in Elk Grove by extending services into areas planned for service and explore expansion as part of new development areas. **Action RC-3.2:** Continue collaborating with Elk Grove Water District, Sacramento County Water Agency, and other water providers to participate in regional water-saving initiatives, encourage voluntary water conservation measures, and share best practices for water conservation strategies. **Action RC-3.3:** Mandate water efficiency standards for new construction that require water-neutral development for projects expected to exceed the historical water use of a parcel. **Action RC-3.4:** Regularly review and update the Water Efficient Landscape Ordinance to comply with evolving State laws.

Strategy	Action
Green Economy	
Strategy GE-1: Support Green Businesses Measurable Outcomes - Not quantified	**Action GE-1.1:** Prioritize the retention, expansion, and attraction of green industry businesses and businesses utilizing sustainable practices resulting in an innovative, low-carbon economy. **Action GE-1.2:** Create programs, policies, and incentives that increase retention, expansion, and attraction of green industry and sustainable businesses. **Action GE-1.3:** Connect businesses with organizations that recognize sustainability efforts and provide resources like environmental updates, incentives, and educational tools. **Action GE-1.4:** Support green industry and sustainable businesses in meeting their hiring needs while prioritizing the training and employment of Elk Grove residents in green jobs.
Climate Action Commitment	
Strategy CA-1: Conduct Meaningful Community Outreach Measurable Outcomes - Not quantified	**Action CA-1.1:** Implement the Climate Ambassador Program as a permanent program, which recruits and trains volunteers to serve as local sustainability champions and educators. **Action CA-1.2:** Develop a neighborhood resilience committee program to increase connectedness among the community and provide support during climate hazard events. **Action CA-1.3:** Continue to encourage and connect residents with Property Assessed Clean Energy (PACE) programs, such as the Home Energy Renovation Opportunity (HERO) and CaliforniaFirst, which serve as an innovative mechanism for financing energy efficiency and renewable energy improvements on residential and commercial properties. **Action CA-1.4:** Partner with SMUD to establish a comprehensive community outreach and education campaign to raise awareness about the benefits of building electrification, available incentives and programs, and the importance of decarbonizing the building sector. **Action CA-1.5:** Partner with SMUD to promote its Residential, Neighborhood, and Commercial SolarShares programs, which allow residential customers, commercial customers, and developers to purchase renewably sourced electricity without having a solar system on site. **Action CA-1.6:** Work with regional partner agencies and utilities, such as SMAQMD and SMUD, to promote rebates and incentives for installing both residential and nonresidential renewable energy (e.g., solar) and battery storage systems.
Strategy CA-2: Provide Community Education on Public Health and Wellbeing Measurable Outcomes - Not quantified	**Action CA-2.1:** Develop an educational campaign to raise awareness about the benefits of electric landscaping equipment. **Action CA-2.2:** Develop informational materials to provide information to residents and businesses to support the city's tree canopy. **Action CA-2.3:** Partner with CBOs, such as the Elk Grove Community Garden and Learning Center and the Food Literacy Center, to expand gardening and healthy food education opportunities for individuals and families. **Action CA-2.4:** Promote circular economy awareness through educational campaigns and programs to educate residents and businesses about circular principles and encourage them to adopt circular practices and behaviors. **Action CA-2.5:** Promote California's Clean Off-Road Equipment Voucher Program for professional landscape services, which provides vouchers to purchase zero-emission landscaping equipment.

Strategy	Action
Strategy CA-3: Provide Community Education on Water Efficiency Measurable Outcomes - Not quantified	**Action CA-3.1:** Promote the use of smart water management technologies (e.g., smart irrigation controllers, leak detection devices, and real-time water monitoring systems) that provide real-time data on water usage and encourage water conservation. **Action CA-3.2:** Continue conducting public education and outreach to raise awareness about the significance of water conservation, offer practical tips for reducing water consumption, and emphasize the opportunities accessible to residents for decreasing water usage.
Strategy CA-4: Measure and Manage Climate Action Progress Measurable Outcomes - Not quantified	**Action CA-4.1:** Prepare and publish an annual report summarizing the City's progress towards its GHG reduction and adaptation goals, using the KPIs and other relevant metrics. Include narratives highlighting key accomplishments, challenges, lessons learned, and case studies of successful projects and initiatives. Present the report to the City Council to inform future climate action and adaptation-related budget and policy decisions. **Action CA-4.2:** Regularly update data on progress towards the City's climate action and adaptation goals, including KPIs, in a clear and transparent manner for community members. **Action CA-4.3:** Conduct regular surveys, focus groups, and assessments to collect participant feedback and gauge shifts in knowledge, attitudes, and behaviors about sustainability. **Action CA-4.4:** Establish a dedicated Climate Action Coordinator position within the City to lead climate, resilience and sustainability initiatives across the City that include (1) supporting implementation of the Climate Compass, (2) collaborating across departments and stakeholders on opportunities to achieve the climate, resilience and sustainability goals, (3) building partnerships with businesses, community organizations, educational institutions, and residents, and (4) pursuing funding and resource opportunities.

Source: City of Elk Gove 2025.

In order to determine whether these community GHG emissions reduction strategies and actions would achieve the reduction targets, GHG emissions reductions were quantified for the years of 2030 and 2045 based on the methodology used to derive the reduction targets, which aligns with the California Governor's Office of Land Use and Climate Innovation General Plan Guidelines (Table 2-15). It should be noted that while GHG emissions reductions were quantified for strategies wherever supporting data and reasonable assumptions were available to support calculations, certain strategies were not quantifiable because of lack of available data or quantification methods. However, these strategies would still be expected to reduce GHG emissions.

Table 2-15 Community GHG Emissions Reduction Strategies

Strategy Number	Strategy Name	GHG Reductions ($MTCO_2e$)	
		2030	2045
Buildings and Energy (BE)			
BE-1	Electrify and Decarbonize Buildings	36,436	199,967
BE-2	Increase Density and Expand Affordable Housing	Included in TR-1	Included in TR-1
BE-3	Increase Local Renewable Energy Use and Storage	280,438	0
BE-4	Reduce Energy Consumption and Energy Burden	Included in BE-1	Included in BE-1
	Buildings and Energy Subtotal	**316,875**	**199,967**
Transportation (TR)			
TR-1	Decrease Vehicle Miles Traveled	4,864	5,281
TR-2	Increase Zero-Emission Vehicle Adoption	49,607	110,886
TR-3	Reduce Off-Road Transportation Emissions	9,542	10,856
	Transportation Subtotal	**64,013**	**127,023**

Strategy Number	Strategy Name	GHG Reductions ($MTCO_2e$)	
		2030	2045
Resilience and Adaptation (RA)			
RA-1	Improve Climate and Emergency Preparedness	N/A	N/A
RA-2	Build Capacity for Current and Future Flooding	N/A	N/A
RA-3	Protect Populations from Wildfire Smoke	N/A	N/A
RA-4	Reduce Exposure to Extreme Heat and Mitigate the Urban Heat Island Effect	Included in RA-5	Included in RA-5
RA-5	Expand the Urban Tree Canopy	185	880
RA-6	Expand Nature-Based Solutions	NA	NA
	Resilience and Adaptation Subtotal	**185**	**880**
Resource Consumption (RC)			
RC-1	Increase Organic Waste Diversion	4,755	28,775
RC-2	Promote a Circular Economy	Included in RC-1	Included in RC-1
RC-3	Reduce Water Use	140	0
	Resource Consumption Subtotal	**4,895**	**28,775**
Green Economy (GE)			
GE-1	Support Green Businesses	N/A	N/A
	Green Economy Subtotal	**N/A**	**N/A**
Climate Action Commitment (CA)			
CA-1	Conduct Meaningful Community Outreach	N/A	N/A
CA-2	Provide Community Education on Public Health and Wellbeing	N/A	N/A
CA-3	Provide Community Education on Water Efficiency	N/A	N/A
CA-4	Measure and Manage Climate Action Progress	N/A	N/A
	Climate Action Commitment Subtotal	**N/A**	**N/A**
	Total Reductions from Strategies	**385,968**	**356,645**
	Reduction Needed to Meet Target	*327,615*	*322,498*
	Target Met?	Yes	Yes
	Remaining Gap to Target	-58,353	-34,148

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

Source: City of Elk Grove 2025.

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

CITY OPERATIONS GHG EMISSIONS REDUCTION STRATEGIES AND ACTIONS

To reduce GHG emissions associated with City operations, the Plan identifies eight strategies with supporting actions within four categories (Table 2-16). In addition, where quantifiable, measurable outcomes are also provided on a strategy-by-strategy basis to serve as milestones for the City to achieve their community GHG emissions reduction goals for 2030 and 2045. The City operations GHG community reduction strategies and actions are summarized below.

Buildings and Facilities

Municipal buildings and facilities represent the largest source of GHG emissions in City operations, accounting for 41 percent of the total City operations GHG emissions. Under the approach of the Climate Compass, the City's effort to decarbonize its facilities focuses on three interconnected pathways: electrification, renewable energy integration, and enhanced efficiency. By transforming its building portfolio, the City can demonstrate the practical implementation of climate solutions, such as installing LED lighting and smart thermostats, while improving operational resilience and reducing long-term energy costs. These improvements extend beyond emissions reductions; they create healthier workspaces for employees, showcase innovative technologies to the community, and strengthen infrastructure against climate impacts.

Fleet and Employee Commute

Fleet and employee commute make up the second largest share of City operational emissions, with fleet vehicles and employee commute together accounting for 34 percent of total City operation GHG emissions. Fleet electrification takes advantage of rapidly improving vehicle technologies and declining costs while reducing maintenance needs and simplifying operations. A mix of incentives, infrastructure improvements, and flexible work arrangements for employee commutes can reduce single-occupancy vehicle trips while boosting staff morale. The proposed Plan's complementary strategies offer multiple, adaptable pathways for reducing emissions based on departmental needs and operational priorities. Transitioning City operations to a low-carbon transportation system aligns with broader regional mobility trends and infrastructure investments. By partnering with regional agencies to expand charging infrastructure, the City can achieve greater network coverage at a lower cost. Similarly, employee commute programs that connect with regional transit efforts offer more comprehensive travel options for staff.

Resilience

For Elk Grove, climate-related hazards include prolonged droughts, extreme heat events, wildfire smoke, and increased flood risks, all of which can potentially disrupt essential services and damage critical infrastructure. While resilience strategies are not directly reflected in the City operations GHG emissions inventory and forecast, they offer benefits that strengthen community and employee wellbeing. The Climate Compass includes strategies and associated actions that recognizes that resilience should be embedded in day-to-day operations, not as a standalone effort. Climate-informed planning and design decisions today can deliver long-term benefits while helping to reduce future risks and costs. Thoughtful integration of resilience into infrastructure planning, maintenance practices, and emergency preparedness creates a more adaptive municipal system that can meet today's needs while staying responsive to evolving climate conditions.

Solid Waste and Water

Water and waste management activities account for 4 percent of total City operations GHG emissions. Water systems require energy throughout their lifecycle—from pumping and treatment to distribution—while organic waste in landfills generates methane. Although these areas represent a smaller portion of emissions compared to other sectors, reducing water use and promoting sustainable waste management deliver benefits far beyond emissions reduction and are essential to advancing the City's broader resources consumption goals.

Water conservation across municipal operations is a necessary response to California's increasingly variable climate. City buildings, parks, and landscaped medians offer opportunities to showcase water efficiency strategies. The Climate Compass includes strategies and associated actions that promote smart irrigation systems, drought-tolerant landscaping, and facility water audits to help reduce consumption while maintaining essential services and public amenities. These efforts strengthen resilience during drought and restrictions, lower utility costs, and are visible examples of effective conservation.

Complementing a resource-conscious approach, sustainable waste management practices improve the flow and handling of materials. Enhanced recycling and composting programs, environmentally preferable purchasing policies, and waste reduction initiatives help the City reduce disposal costs and environmental impacts. These efforts support the City's broader goals of promoting a circular economy, where materials are reused, repurposed, or recycled to their highest value, advancing operational efficiency and resource stewardship.

Table 2-16 Elk Grove City Operations GHG Emissions Reduction Strategies, Actions, and Measurable Outcomes

Strategy	Action
Buildings and Facilities (BF)	
Strategy BF-1: Electrify and Decarbonize City Buildings and Facilities Measurable Outcomes - Retrofit 20% of existing City buildings to all electric by 2030 and 100% by 2045. - Replace 10% of existing diesel backup generators with zero-emission alternatives by 2030 and 100% by 2045.	**Action BF-1.1:** Adopt a policy that requires all new City buildings to be all-electric starting in 2026, and additionally, that requires existing buildings purchased by the City to be fully electrified within five years of purchase. **Action BF-1.2:** Develop and implement a roadmap outlining the necessary steps and timeline for electrifying all existing City buildings and facilities, including a detailed inventory of current building systems, and a prioritized list of buildings for electrification based on factors such as age of equipment, energy use intensity, and necessary electrification measures. The roadmap should also include cost estimates, potential funding sources, and projected energy savings and GHG emissions reductions for each project. **Action BF-1.3:** Conduct a feasibility study and cost analysis of replacing the natural-gas-powered pool heating system at the Aquatics Center with an electric or other zero-emission heating system, and based on findings, implement the replacement as soon as feasibly possible.
Strategy BF-2: Increase Renewable Energy Use and Storage Measurable Outcomes - 100% of electricity used by City buildings and facilities is carbon-free by 2030, continuing through 2045.	**Action BF-2.1:** In coordination with SMUD, ensure that electricity used at City buildings and facilities, along with electricity used for streetlights and traffic lights, is sourced from renewable sources to the maximum extent possible. **Action BF-2.2:** Continue to install solar and battery storage systems on suitable City buildings and facilities, prioritizing installations based on solar potential, historic energy consumption, roof condition, available site area, and potential cost savings. **Action BF-2.3:** Procure renewable diesel for use in all diesel-powered generators by 2030 and transition to carbon-free backup power supplies by 2045.
Strategy BF-3: Reduce Energy Consumption Measurable Outcomes - Not quantified	**Action BF-3.1:** Develop and adopt a green building policy requiring all new City buildings to meet or exceed CALGreen Tier 1 standards, establishing requirements for energy-efficient design, renewable energy integration, water conservation, and sustainable materials use. **Action BF-3.2:** Phase in the installation of a building energy management system(s) (BEMS) in City buildings and facilities that provide real-time monitoring and control of energy usage, allowing for optimization of heating, cooling, and lighting systems. Each BEMS will include smart sensors, automated controls, and data analytics capabilities to identify energy-saving opportunities. Phasing should start with the largest energy-consuming buildings and facilities and gradually expand to all facilities. Include required training and technical support to properly use each system. **Action BF-3.3:** Conduct an audit of HVAC systems in all existing City buildings and develop a schedule for end of useful life replacement of outdated systems with high-efficiency models, including features like variable refrigerant flow (VRF) systems and appropriately placed smart thermostats, and implementing regular maintenance to ensure optimal performance. **Action BF-3.4:** Establish a retro-commissioning program for all existing City buildings, which encompasses a systematic process to identify and implement operational and maintenance improvements, and aims to optimize building systems, reduce energy consumption, improve occupant comfort, and extend equipment life.
Fleet and Employee Commute (FEC)	
Strategy FEC-1: Reduce City Employee Commute VMT Measurable Outcomes - 11% reduction in employee commute trips by 2030 and 23% by 2045.	**Action FEC-1.1:** Conduct regular City employee commute surveys (i.e., every 2-3 years) to understand commute patterns and quantify associated trips and VMT and to incorporate findings into future GHG inventory updates. **Action FEC-1.2:** Develop an employee carpool matching system that is integrated into the City's intranet, which would allow employees to input their commute details and preferences and match them with suitable carpool partners. Provide incentives for regular use of the system, including City merchandise, or small quarterly stipends. **Action FEC-1.3:** Partner with SacRT to establish a program offering monthly public transit passes to City employees.

Strategy	Action
	Action FEC-1.4: Establish a guaranteed ride home program that provides rides for City employees in the form of vouchers for rideshare or taxi services up to a certain number of times per year. The program would be intended for employees who use more sustainable transportation modes for their commute, such as public transit, carpooling, biking, or walking, and would prevent employees from being stranded in the event of public transit schedule changes, damage to their bicycle, or other unexpected situations. **Action FEC-1.5:** Conduct a review of City buildings and facilities to identify opportunities to increase amenities that encourage biking, such as bicycle parking/storage, shelters, end-of-trip facilities (e.g., repair stands, bicycle wash stations, showers, locker rooms), and electric bicycle charging infrastructure. **Action FEC-1.6:** Launch an annual VMT reduction challenge for City employees, which would encourage departments or teams to compete in reducing their collective VMT over a set period each year by offering prize incentives for the winning team(s). **Action FEC-1.7:** Establish an e-bike lending library for City employees to use as an alternative to vehicle use for intracity travel during work hours. **Action FEC-1.8:** Develop and implement an incentive program for City employees who purchase a bike/e-bike for their commute (e.g., walking, biking). Incentives may include City merchandise, reimbursement up to a specified amount for the purchase of a bike/e-bike, or other benefits that are correlated with the number of days commuted using active transportation modes.
Strategy FEC-2: Shift to Clean On-Road and Off-Road Vehicles and Equipment Measurable Outcomes - Sufficient EV charging infrastructure installed to support 25% of employee vehicles as EV/PHEV by 2030 and 97% by 2045. - 20% of the City's fleet is EV by 2030 and 100% by 2045.	**Action FEC-2.1:** Continue to implement the Infrastructure Plan for Fleet Electrification (and future updates) to transition the City's vehicle fleet to ZEVs (mostly EVs) and to continue scaling up and providing ongoing maintenance for the infrastructure required to support an all-electric City fleet, including the deployment of EV charging stations at appropriate locations. **Action FEC-2.2:** Develop a policy to require greater use of low- and zero-emissions off-road vehicles and encourage electric equipment (e.g., landscaping, construction) for City-owned equipment, City-funded projects, and City contractors.
Resilience (RS)	
Strategy RS-1: Protect the City's Assets and Utilize City Facilities to Protect the Community from Climate Hazards Measurable Outcomes - Not quantified	**Action RS-1.1:** Conduct an updated, comprehensive climate change vulnerability assessment specific to the City's physical assets (e.g., buildings, facilities) and planned Capital Improvement Program projects, and based on findings, develop a prioritized list of City assets requiring climate adaptation interventions. **Action RS-1.2:** Develop a policy that establishes heat-resilient building standards for all new City construction and major renovations, which addresses aspects such as green/cool roofs, enhanced insulation, and passive cooling design elements. **Action RS-1.3:** Retrofit existing City buildings and facilities to improve their resilience to climate hazards, such as extreme heat and extreme precipitation. Determine and implement solutions that are tailored and feasible for each building or facility. **Action RS-1.4:** Develop a policy mandating the consideration of future climate projections in Capital Improvement Program projects that includes a checklist of resilience measures to be considered for different types of projects (e.g., buildings, roads, parks). **Action RS-1.5:** Install cool pavement and permeable pavement on all City parking lots to help reduce the urban heat island effect and provide additional flood protection, prioritizing permeable pavement in lots or areas that are more flood-prone. Test different types of cool and permeable pavement materials, and based on results, develop guidelines for broader implementation throughout the city. **Action RS-1.6:** Plant shade trees and add other heat-mitigating amenities around City buildings and facilities, such as reflective pathway surfaces, more shaded seating areas, hydration stations, and misters, among other amenities.

Strategy	Action
	Action RS-1.7: Implement rigorous preventive maintenance schedules for all City infrastructure to enhance their longevity, bolster their resilience, and reduce the need for new materials (i.e., for premature repairs and replacement).
Solid Waste and Water (WW)	
Strategy WW-1: Reduce Water Use Measurable Outcomes - Reduce outdoor water consumption by 10% by 2030 and by 30% by 2045. - Reduce indoor water consumption by 10% by 2030 and by 20% by 2045.	**Action WW-1.1:** Develop and implement a plan to gradually replace water-intensive landscaping (e.g., turfgrass that is not intended for recreational use) at City and CCSD-managed facilities and parks with native, drought-tolerant plants and/or permeable hardscaping, which should include a phased and prioritized implementation schedule. As part of plan implementation, update City's landscape guidelines to reflect appropriate planting and maintenance guidance for drought-tolerant landscaping. **Action WW-1.2:** Upgrade all City and CCSD-managed irrigation systems to smart, weather-based systems that use real-time weather data and soil moisture sensors to optimize watering schedules and reduce overwatering, and develop a maintenance and monitoring program to ensure long-term efficiency. **Action WW-1.3:** Conduct periodic water use audits for all City buildings and facilities, which will help to identify leaks, inefficient fixtures, and opportunities for water reuse. Based on regular audit results, develop a list of water-saving upgrades and needed operational changes.
Strategy WW-2: Practice Sustainable Waste Management Measurable Outcomes - Achieve a 65% waste diversion rate at City facilities by 2030 and by 80% by 2045.	**Action WW-2.1:** Conduct a review of existing City procurement and operational practices and adopt practices that further avoid the generation of waste, such as using reusable materials, compostable products, and reduced packaging. Additionally, develop training for City employees on sustainable purchasing, procurement, and operations to maximize avoidance of waste generation, and conduct periodic waste audits to measure the success of existing efforts and inform potential changes to policies or procedures, as necessary. **Action WW-2.2:** Increase recycling and organic waste diversion at all City buildings and facilities by inventorying and identifying needs for additional recycling and food waste bins and appropriate signage and education opportunities (e.g., regular staff presentations, mini workshops) to inform/educate employees and the public on proper waste disposal and recycling. **Action WW-2.3:** Institutionalizes a sustainable events policy that requires zero waste at events hosted by the City. **Action WW-2.4:** Adopt a policy that requires minimum recycled content in construction materials for all City construction and maintenance projects, and includes the development of a preferred materials list. Regularly update the policy to reflect advancements in recycled material technology and availability.

Source: City of Elk Gove 2025.

To determine whether these strategies and actions would achieve the GHG emissions reduction targets for City operations, GHG emissions reductions were quantified for the years of 2030 and 2045 based on the methodology used to derive the reduction targets (Table 2-17). It should be noted that while GHG emissions reductions were quantified for strategies wherever supporting data and reasonable assumptions were available to support calculations, certain strategies were not quantifiable because of lack of available data or quantification methods. However, these strategies would still be expected to reduce GHG emissions.

The total estimated GHG emissions reductions from all City strategies quantified would be 2,501 $MTCO_2e$ in 2030 and 2,450 $MTCO_2e$ in 2045. As such, the total estimated reductions from all City operations GHG emissions reduction strategies would be sufficient to meet the 2030 and 2045 targets.

Table 2-17 Elk Grove City Operations GHG Emissions Gap Analysis ($MTCO_2e$)

Strategy Number	Category	Strategy	GHG Reductions ($MTCO_2e$)	
			2030	2045
BF-1	Buildings and Facilities	Electrify and Decarbonize City Buildings and Facilities	262	1,588
BF-2		Increase Renewable Energy Use and Storage	1,762	0
BF-3		Reduce Energy Consumption	N/A	N/A

Strategy Number	Category	Strategy	GHG Reductions ($MTCO_2e$)	
			2030	2045
FEC-1	Fleet and Employee Commute	Reduce City Employee VMT	87	45
FEC-2		Shift to Clean On-Road and Off-Road Vehicles and Equipment	369	722
RS-1	Resilience	Protect City Assets and Utilize City Facilities to Protect the Community from Climate Hazards	N/A	N/A
WW-1	Solid Waste and Water	Reduce Water Use	1	0
WW-2		Practice Sustainable Waste Management	20	94
		Total Reductions from Strategies	**2,501**	**2,450**
		Reduction Needed to Meet Target	1,923	2,070
		Target Met?	Yes	Yes
		Remaining Gap to Target	-578	-380

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

Source: City of Elk Grove 2025.

2.4.5 Evaluation of Plan Elements

The Climate Compass is a policy document that does not propose any specific development or any other specific physical change to the environment. No growth would result from implementation of the Plan as it does not influence the rate of growth anticipated in the General Plan (including the Housing Element). No changes to General Plan land use designations, zoning, or land use–specific projects are proposed as part of the Plan. In addition, the Plan does not include strategies or actions that would result in the construction of new or extension of existing roadways within the city. Future developments related to the Plan would be subject to project-level environmental review.

The proposed GHG emission reduction strategies and actions represent the component of the project that could result in physical impacts on the environment. For this reason, the strategies and actions are the focus of the analysis in this SEIR. As summarized above, the strategies and actions proposed in the Plan provide a range of potential tools, from proposed ordinances, plans, and support of legislation to specific programs designed to reduce GHG emissions within the city and from City operations.

The analysis that follows assumes that all Plan measures and actions would be implemented and focuses on the measures and actions with potential to result in physical environmental impacts. The potential environmental effects of all strategies and actions are considered in this SEIR, whether the Plan quantifies reductions from the strategy or action or the strategy or action supports GHG emissions reductions in an unquantifiable way. Furthermore, this SEIR does not speculate about site-specific physical impacts that could occur if and when a specific site improvement is proposed in the future as the exact location of future projects are unknown at this time. Rather, this SEIR considers the types of impacts that could occur with implementation of the proposed GHG emissions reduction strategies and actions. The analysis of impacts that would result from implementation of the Plan is conducted at the program-level, and specific projects that implement the strategies and actions established by the Plan and require discretionary approval would be subject to subsequent CEQA review at the project-level.

2.5 RESPONSIBILITIES FOR CLIMATE COMPASS IMPLEMENTATION

The Climate Compass includes regular monitoring to track and report progress toward achieving GHG emissions reductions targets. After adoption, the City's Civic Innovation and Sustainability Division will maintain the Plan. This division will coordinate with other City departments to facilitate and oversee implementation, including tracking and reporting on the progress of each strategy and action. Staff members will track progress relative to the expected quantified outcomes of each GHG reduction strategy and action, using the Implementation and Monitoring Program

described and summarized in Chapter 5 of the Plan. The Implementation and Monitoring Program includes all strategies and actions (i.e., community and City operations) that would contribute to the achievement of the City's reduction targets and goals as well as measurable outcomes, implementation timelines, City department leads, enforcement mechanisms, estimated GHG reduction potential, relative costs, and potential funding sources. Refer to Chapter 5, "Implementation and Monitoring," of the Climate Compass for a detailed description of these components.

The City will conduct annual monitoring beginning one year after approval of the Plan to track progress and identify where further efforts and additional resources may be needed. Annual monitoring reports will include the status of measure implementation using monitoring metrics to show progress in meeting the reduction targets.

2.5.1 Qualified GHG Emissions Reduction Plan

Section 15183.5(b) of the State CEQA Guidelines states that project-specific environmental documents can find that project-level GHG emissions would not be cumulatively considerable if the project complies with the requirements of a qualified GHG emissions reduction plan. To meet the requirements of State CEQA Guidelines Section 15183.5(b), a qualified GHG emissions reduction plan must do the following:

(1) Plan Elements. A plan for the reduction of greenhouse gas emissions should:

- (A) Quantify greenhouse gas emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area;
- (B) Establish a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable;
- (C) Identify and analyze the greenhouse gas emissions resulting from specific actions or categories of actions anticipated within the geographic area;
- (D) Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level;
- (E) Establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels;
- (F) Be adopted in a public process following environmental review.

The Climate Compass fulfills the requirements of a qualified GHG emissions reduction plan in accordance with Section 15183.5(b) of the State CEQA Guidelines. The Plan includes the City's GHG emissions inventory, GHG emissions forecasts, and GHG emissions targets. The Plan also provides specific GHG emission reduction strategies and actions that collectively achieve the emissions targets and requires the City to conduct annual progress reporting as part of the Plan's implementation. Lastly, the Plan is a discretionary project which must undergo environmental review pursuant to CEQA and is therefore subject to public review. Based on the criteria established in Section 15183.5(b) of the State CEQA Guidelines, the Climate Compass would constitute a qualified GHG emissions reduction plan.

2.5.2 Future Streamlining of GHG Emissions Analysis at the Project-Level

Under CEQA, projects that required discretionary approval must disclose whether they would generate GHG emissions that would have a significant impact on the environment, or if they would conflict with a plan or regulation adopted to reduce emissions. As discussed above in Section 2.5.1, "Qualified GHG Emissions Reduction Plan," Section 15183.5 of the State CEQA Guidelines establishes a mechanism for agencies to prepare a plan for the reduction of GHG emissions that analyzes and mitigates the effects of GHG emissions at a programmatic level. Once adopted, the Climate Compass would serve as the City's approved GHG emissions reduction plan for all new community and municipal development within the Planning Area.

Since the Climate Compass has been prepared in accordance with Section 15183.5(b)(1) of the State CEQA Guidelines, this Draft SEIR provides the appropriate level of environmental review to allow future projects to tier from and streamline their analysis of GHG emissions. Future projects that are consistent with the General Plan could show consistency with the Plan via a Climate Compass Consistency Review Checklist (Consistency Review Checklist) and thus, could streamline their GHG analysis.

All environmental documents that rely on the Consistency Review Checklist to reduce GHG emissions would be required to identify those requirements specified in the Plan that apply to the project, and, if those requirements are not otherwise binding and enforceable, incorporate those requirements as mitigation measures applicable to the project. Consistent with State CEQA Guidelines 15168, because this SEIR does not provide project-level review of specific development projects within the Planning Area, future discretionary activities may require subsequent CEQA analysis if their impacts are not adequately considered and mitigated, as necessary, within this SEIR. If there is substantial evidence that the effects of a particular project may be cumulatively considerable notwithstanding the project's compliance with the specified requirements in the Climate Compass, a CEQA analysis of GHG emissions would be prepared for the project.

Therefore, the qualified Climate Compass, this SEIR, and the Consistency Review Checklist work together to provide the programmatic environmental review and streamlining mechanism for evaluating the GHG emissions of future development projects. The Consistency Review Checklist would be used only for projects that wish to streamline their CEQA GHG impact analysis pursuant to CEQA Guidelines sections 15064(h)(3), 15064.4 and 15183.5(b)(2).

2.5.3 Project Consistency with Applicable Plans

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

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

2.6 INTENDED USES OF THIS SEIR

The SEIR will serve as an informational document for decision-makers and the public. The City Council will review and consider the information contained in the SEIR pursuant to its evaluation of whether to approve the project. The SEIR is not intended to recommend either approval or denial of a project. If the project will have significant and unavoidable environmental impacts (i.e., no feasible mitigation is available to reduce the impact to a less-than-significant level), the City Council may still approve the project if it believes that social, economic, or other benefits outweigh the unavoidable impacts. The City Council would then be required to make findings and state, in writing, the specific reasons for approving the project, based on information in the SEIR and other information in the administrative record.

2.7 REQUIRED PROJECT APPROVALS

The discretionary actions associated with the 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.

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3 ENVIRONMENTAL SETTING, IMPACTS, AND MITIGATION MEASURES

This chapter is organized by environmental resource topic. Each resource topic is addressed in a separate section that presents an integrated discussion of the existing conditions (including environmental setting and regulatory setting) associated with the resource, potential environmental effects of the Plan on the resource, and mitigation measures to reduce significant effects.

Cumulative and growth-inducing impacts are discussed in Chapter 4, "Cumulative Impacts," and Chapter 6, "Other CEQA-Mandated Sections," respectively.

APPROACH TO THE ENVIRONMENTAL ANALYSIS

Sections 3.1 and 3.2 of this Draft SEIR present a discussion of the regulatory background, existing conditions, environmental impacts associated with implementation of the Plan, mitigation measures to reduce the level of impact, and residual level of significance (i.e., after application of mitigation, including impacts that would remain significant and unavoidable after application of all feasible mitigation measures). Issues evaluated in these sections consist of the environmental topics identified for review in the Notice of Preparation (NOP) prepared for the Plan (see Appendix A of this Draft SEIR). Chapter 4 of this Draft SEIR, "Cumulative Impacts," presents an analysis of the Plan's impacts considered together with those of other past, present, and probable future projects producing related impacts, as required by Section 15130 of the State CEQA Guidelines. Chapter 5, "Alternatives," presents a reasonable range of alternatives and evaluates the environmental effects of those alternatives relative to the Plan, as required by Section 15126.6 of the State CEQA Guidelines. Chapter 6, "Other CEQA-Mandated Sections," includes an analysis of the Plan's growth inducing impacts, as required by Section 21100(b)(5) of CEQA.

The remainder of this chapter addresses the following resource topics:

- Section 3.1, "Energy"; and
- Section 3.2, "Greenhouse Gas Emissions and Climate Change,"

Section 3.1 and 3.2 of this Draft SEIR generally include the following components.

Regulatory Setting: This subsection presents information on the laws, regulations, plans, and policies relevant to each resource topic, including federal, State, regional, and City regulations that address potentially adverse environmental impacts.

Environmental Setting: This subsection presents the existing environmental conditions within the General Plan Planning Area (i.e., land uses within the city limits and the four study areas outside city limits), as appropriate, in accordance with State CEQA Guidelines Section 15125. This setting generally serves as the baseline against which environmental impacts are evaluated. The NOP for the Plan was issued on December 6, 2024. Typically, and in accordance with State CEQA Guidelines Section 15125, the date on which the NOP is issued is considered appropriate for establishing the baseline, and the NOP date is used as the baseline in this Draft SEIR. This includes the planned development potential and policy provisions set forth in the adopted General Plan, as amended.

Environmental Impacts and Mitigation Measures: In accordance with the State CEQA Guidelines (CCR Sections 15126, 15126.2, and 15143), this section identifies the method of analysis to determine whether an impact may occur, and the thresholds of significance used to determine the level of significance of the environmental impacts for each resource topic. The thresholds of significance are based on the checklist presented in Appendix G of the most recently adopted State CEQA Guidelines (December 28, 2018), best available data, applicable regulatory standards, and local practice and standards. The level of each impact is determined by analyzing the effect of the Plan on the defined baseline conditions and comparing it to the applicable significance threshold. Each impact discussion also includes a summary of the relevant impact analysis and conclusion provided in the General Plan EIR, as amended by the 2023 Subsequent

EIR to the General Plan EIR (2023 Subsequent EIR) for the General Plan Amendments and Update of Vehicle Miles Traveled (VMT) Standards Project (GPAs/VMT Standards Project). The impact discussion concludes by determining whether the Plan would result in a new significant effect or more severe impact than what was identified in the General Plan EIR, as amended by the 2023 Subsequent EIR, pursuant to State CEQA Guidelines 15163.

Project impacts and mitigation measures are numbered sequentially in each subsection (e.g., Impact 3.1-1, Impact 3.1-2, Impact 3.1-3, etc.). A summary impact statement precedes a more detailed discussion of each environmental impact. The discussion presents the analysis, rationale, and substantial evidence upon which conclusions are drawn regarding the level of significance of the impact.

An impact would be considered "less than significant" if it would not involve a substantial adverse change in the physical environment. An impact would be "potentially significant" or "significant" if it could or clearly would, respectively, result in a substantial adverse change in the physical environment; both are treated the same under CEQA in terms of procedural requirements and the need to identify feasible mitigation.

This Draft SEIR identifies feasible mitigation measures that could avoid, minimize, rectify, reduce, or compensate for potentially significant or significant adverse impacts (PRC Section 21081.6[b]). Mitigation measures are not required for effects found to be less than significant. Where feasible mitigation for a significant or potentially significant impact is available, it is described in this Draft SEIR following the impact, along with its effectiveness at addressing the impact. Each identified mitigation measure is labeled numerically to correspond with the impact it addresses. Where feasible mitigation is not sufficient to reduce an impact to a less-than-significant level, the impact is identified as significant and unavoidable. The final determination of the level of significance of each impact is presented in bold text in the impact summary and at the end of each impact discussion.

References: The full references associated with the references cited in Sections 3.1 and 3.2 are presented in Chapter 8, "References," organized by chapter or section number.

EFFECTS FOUND NOT TO BE SIGNIFICANT

CEQA allows a lead agency to limit the detail of discussion of environmental effects that are not potentially significant (PRC Section 21100, CCR Section 15128). No impacts would occur to the environmental resources listed below with adoption and implementation of the Climate Compass, as described below. Accordingly, these environmental resources are not addressed in later sections of this Draft SEIR.

Mineral Resources

No significant mineral resources have been identified in the Planning Area. There are no sites in the Planning Area used for mineral extraction, nor any sites designated as an important mineral recovery site. Therefore, there would be no impact on mineral resources with implementation of the Plan. This impact is not discussed further in this Draft SEIR.

Seiche, Tsunami, and Mudflow

The Planning Area's location (inland, away from any water bodies) and topography (relatively flat) ensure that there would be no impact related to seiche, tsunami, or mudflow. Therefore, this impact is not discussed further in this Draft SEIR.

Wildfire

The Planning Area is not located in or near a Very High Fire Hazard Severity Zone; however, a small eastern portion of the Planning Area is within a High Fire Hazard Severity Zone (CAL FIRE 2025). Due to the nature of the Climate Compass as a GHG emissions reduction plan, implementation of the Plan would not introduce new housing within the Planning Area and does not include any land use or zoning changes. Furthermore, while the Plan includes strategies and actions to reduce GHG emissions, these strategies and actions also provide co-benefits that increase climate hazards resilience,

water conservation, reduced fossil fuel consumption, and use of renewable energy sources, which help to reduce wildfire risks. Therefore, implementation of the Plan would not exacerbate wildfire risks and no significant impact related to wildfire would occur. This issue is not discussed further in this Draft SEIR.

ENVIRONMENTAL EFFECTS ADEQUATELY ADDRESSED IN THE GENERAL PLAN EIR, AS AMENDED BY THE 2023 SUBSEQUENT EIR

In accordance with Section 15163(b) of the State CEQA Guidelines, a lead agency may limit the level of detail within a supplemental EIR to that only required necessary to make the previous EIR adequate for the project as revised. As discussed in Section ES.4, "Significant and Unavoidable Impacts," of this Draft SEIR, the General Plan EIR, as amended by the 2023 Subsequent EIR, determined significant and unavoidable impacts would occur to the following environmental resources: aesthetics; air quality; agriculture; biological resources; noise and vibration; public services and recreation; transportation; and utilities and services systems. Adopted mitigation measures from the General Plan EIR, as amended by the 2023 Subsequent EIR (i.e., Mitigation Measures 3.11-X) only apply to the Livable Employment Area (LEA) Community Plan Area. All other environmental resources were determined to result in less than significant impacts.

As demonstrated below, since the impact determinations from the General Plan EIR, as amended by the 2023 Subsequent EIR, for the aforementioned environmental resources remain unchanged with implementation of the proposed Climate Compass, a detailed analysis is not warranted as the previous evaluation in the General Plan EIR, as amended by the 2023 Subsequent EIR, remains adequate for the Plan.

Aesthetics

The General Plan EIR, as amended by the 2023 Subsequent EIR, determined implementation of the General Plan and 2019 Climate Action Plan Update (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 electric vehicle (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.

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.

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 updated reach codes, the types of facilities that would be constructed and operated under the Plan are similar in nature to those described in the 2019 CAP and air pollutant emissions from development activities evaluated within the General Plan EIR, as amended by the 2023 Subsequent EIR. Therefore, implementation of the Climate Compass would not result in new significant impacts or substantially increase the severity of significant environmental impacts disclosed within the General Plan EIR, as amended by the 2023 Subsequent EIR. No further assessment of air quality is warranted.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

3.1 ENERGY

This section describes the existing conditions for energy within the City of Elk Grove (city) General Plan Planning Area, which includes all land within the current city limits as well as the study areas outside the city limits and evaluates the potential effects that implementation of the Climate Compass (Plan) may have on energy. Specifically, this section evaluates whether implementing the Plan would result in an environmental impact related to the wasteful, inefficient, or unnecessary consumption of energy resources, and assesses the Plan's consistency with applicable state or local plans related to renewable energy or energy efficiency.

Comments regarding energy were received from SMAQMD during the NOP scoping period regarding consideration of how the Plan would meet requirements for cooking appliances, space heating, and water heating appliances as a means to achieving full building electrification; consideration of requirements regarding the addition of solar photovoltaic canopies over new parking lots as a new design standard; and consideration of the addition of a new measure that installs pedestrian-friendly infrastructure throughout the city of Elk Grove to support active transportation. Comments from city residents expressed support for the Climate Compass, specifically about the Plan's building energy and transportation focus areas.

Relevant information from the General Plan Environmental Impact Report (EIR) (SCH No. 2017062058), as amended in 2023 by the Subsequent EIR for to the General Plan EIR (2023 Subsequent EIR) for the General Plan Amendments and Update of Vehicle Miles Traveled Standards Project (GPAs/VMT Standards Project) (SCH No. 2022020463), has been incorporated into this section as applicable and necessary.

3.1.1 Regulatory Setting

FEDERAL

Commercial Trucks and Buses Standards

The US Environmental Protection Agency (EPA) and the National Highway Traffic Safety Administration (NHTSA) have set fuel economy and greenhouse gas (GHG) emission standards for medium- and heavy-duty vehicles. In 2011, EPA and NHTSA finalized a joint rule that established a national program to reduce GHG emissions and improve the fuel economy for new medium- and heavy-duty vehicles manufactured in model years 2014 through 2018. In 2016, EPA and NHTSA finalized Phase 2 standards, which require fuel efficiency improvements and pollution reduction for medium- and heavy-duty vehicles, model years 2019 through 2027. On March 29, 2024, a final rule was issued to revise existing standards to reduce GHG emissions from heavy-duty vehicles in model year 2027 and set new, more stringent standards for model years 2028 through 2032 (EPA 2024).

Non-Road Compression-Ignition Engine Standards

EPA established a series of increasingly strict emission standards for new non-road diesel engines. Tier 1 standards were phased in on newly manufactured equipment from 1996 through 2000, depending on the engine horsepower category. Tier 2 standards were phased in on newly manufactured equipment from 2001 through 2006. Tier 3 standards were phased in on newly manufactured equipment from 2006 through 2008. Tier 4 standards, which require advanced emission control technology to attain them, were phased in between 2008 and 2015 (EPA 2025).

STATE

Assembly Bill 802: Whole-Building Energy Data Access and Benchmarking Program Requirements

Assembly Bill (AB) 802, signed into law in October 2015, establishes a California statewide program for benchmarking and publicly disclosing building energy use for commercial, multifamily, and mixed-use buildings 50,000 square feet or larger.

Commercial buildings were required to begin reporting starting June 2018, and multifamily and mixed-use buildings were required to begin reporting starting June 2019. Public disclosure started one year after reporting began. AB 802 replaces AB 1103, a transaction-based benchmarking and disclosure policy that experienced low compliance rates because of difficulties accessing whole-building energy usage information. Therefore, as part of AB 802, utilities are required to provide whole-building aggregated building consumption information to building owners upon request (CEC n.d.).

Executive Order N-79-20

Executive Order (EO) N-79-20 directs the state to scale out the sales of internal combustion engines to 100 percent zero-emission vehicles (ZEVs) sales by 2035. This target helps put the state on a path to carbon neutrality by 2045. By setting the target year to 2035, EO N-79-20 provides time for automakers to scale up and market new ZEVs, as well as further impetus for the providers of charging and refueling infrastructure, electric utilities, and others to plan for and support the increasing consumer demand for these vehicles.

Integrated Energy Policy Report

SB 1389 (Chapter 568, Statutes of 2002) required the California Energy Commission (CEC) to "conduct assessments and forecasts of all aspects of energy industry supply, production, transportation, delivery and distribution, demand, and prices. CEC shall use these assessments and forecasts to develop energy policies that conserve resources, protect the environment, ensure energy reliability, enhance the state's economy, and protect public health and safety" (PRC Section 25301[a]). This work culminated in preparing the first Integrated Energy Policy Report (IEPR).

CEC adopts an IEPR every two years and updates it every other year. The 2023 IEPR, the most recent IEPR, was adopted in February 2024. The 2023 IEPR summarizes California's priority energy issues, outlining strategies and recommendations to further the State's goal of ensuring reliable, affordable, and environmentally responsible energy sources. Energy topics covered in the report include progress toward statewide renewable energy targets and issues facing future renewable development; efforts to increase energy efficiency in existing and new buildings; progress by utilities in achieving energy efficiency targets and potential; improving coordination among the State's energy agencies; streamlining power plant licensing processes; results of preliminary forecasts of electricity, natural gas, and transportation fuel supply and demand; future energy infrastructure needs; the need for research and development efforts to statewide energy policies; and issues facing California's nuclear power plants (CEC 2024a).

Renewable Energy

SB 100 of 2018 sets a three-stage compliance period requiring all California utilities, including independently owned utilities, energy service providers, and community choice aggregators, to generate 52 percent of their electricity from renewables by December 31, 2027; 60 percent by December 31, 2030; and 100 percent carbon-free electricity by December 31, 2045. On September 16, 2022, SB 1020 was signed into law. This bill supersedes the goals of SB 100 by requiring 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.

Senate Bill 350: Clean Energy and Pollution Reduction Act of 2015

The Clean Energy and Pollution Reduction Act of 2015 (SB 350) requires doubling the energy efficiency savings in electricity and natural gas for retail customers through energy efficiency and conservation by December 31, 2030.

Climate Change Scoping Plan

The California Legislature enacted AB 1279 in 2022, which establishes the policy of the State to achieve carbon neutrality as soon as possible, but no later than 2045; to maintain net negative GHG emissions thereafter; and to ensure that by 2045, statewide anthropogenic GHG emissions are reduced by at least 85 percent below 1990 levels. CARB released the Final *2022 Scoping Plan for Achieving Carbon Neutrality* (2022 Scoping Plan) on November 16, 2022, as directed by AB 1279 (CARB 2022). The 2022 Scoping Plan traces the pathway for the State to achieve the goals set forth in AB 1279 and includes several regulations, plans, and policies directed to reduce energy consumption, improve energy efficiency, and increase renewable energy resources within the State. CARB adopted the 2022 Scoping Plan on December 16, 2022.

California Energy Efficiency Action Plan

The *2021 California Building Decarbonization Assessment* is the initial report addressing the mandates codified in AB 3232 (Friedman, Chapter 373, Statutes of 2018). The report analyzes scenarios to reduce GHG emissions by at least 40 percent by 2030 and identifies several strategies that will lead to significant emission reductions related to electricity and natural gas use in buildings, as well as from refrigerants. The strategies include electrification, electricity generation decarbonization, energy efficiency, refrigerant leakage reduction, distributed energy resources, decarbonizing the gas system, and demand flexibility. The assessment shows that California can achieve significantly more than a 40 percent reduction by 2030 through these strategies.

California Building Energy Efficiency Standards (Title 24, Part 6)

California's energy consumption of new residential and nonresidential buildings is regulated by the California Code of Regulations Title 24, Part 6, Building Energy Efficiency Standards (California Energy Code). CEC updates the California Energy Code every three years with more stringent design requirements for reduced energy consumption, resulting in fewer GHG emissions. The 2022 California Energy Code went into effect on January 1, 2023. The 2022 California Energy Code advances the onsite energy generation progress started in the 2019 California Energy Code by encouraging electric heat pump technology and use, establishing electric-ready requirements when natural gas is installed, expanding solar photovoltaic (PV) system and battery storage standards, and strengthening ventilation standards to improve indoor air quality. CEC estimates that the 2022 California Energy Code will save consumers $1.5 billion and reduce GHGs by 10 million metric tons of carbon dioxide-equivalent over the next 30 years (CEC 2022).

The 2025 Building Energy Efficiency Standards (2025 California Energy Code) were adopted on September 11, 2024, and will go into effect on January 1, 2026. According to CEC, the 2025 California Energy Code puts particular emphasis on encouraging efficient electric heat pump technology for space and water heating in newly constructed single-family, multifamily, and select nonresidential building types, replacing end-of-life rooftop heating, ventilation, and air-conditioning units of a specific size with high efficiency systems, establishing electric-ready requirements for commercial kitchens and some multifamily buildings, updating solar and storage standards for buildings to make clean energy available for onsite use while minimizing exports to the electrical grid, and increasing ventilation standards to improve indoor air quality in multifamily buildings. CEC estimates that the 2025 California Energy Code is projected to save $4.8 billion in energy costs over its lifetime and reduce GHG by about 4 million metric tons, equivalent to the annual energy consumption of over half a million homes (CEC 2024b).

California Green Building Standards (Title 24, Part 11)

The California Green Building Standards Code, also known as the CALGreen Code, is a portion of the California Building Code developed by CEC that consists of both voluntary and mandatory requirements related to green building standards for statewide residential and nonresidential construction. The voluntary provisions of the CALGreen Code often guide the adoption of local reach codes by cities and counties. The current version is the 2022 CALGreen Code, which took effect on January 1, 2023. Compared to the 2019 CALGreen Code, the 2022 CALGreen Code strengthened sections pertaining to electric vehicle (EV) and bicycle parking, water efficiency and conservation, and material conservation and resource efficiency, among other sections of the CALGreen Code. The CALGreen Code sets design requirements equivalent to or more stringent than those of the California Energy Code for energy efficiency, water efficiency, waste diversion, and indoor air quality. These codes are adopted by local agencies that enforce building codes and are used as guidelines by State agencies for meeting the requirements of EO B-18-12.

The 2025 CALGreen Code was adopted on September 11, 2024, and goes into effect on January 1, 2026. Relative to the 2022 CALGreen Code, the 2025 version includes increased requirements for EV charging infrastructure (i.e., a higher percentage of parking spaces that must be equipped with EV chargers and more stringent requirements for the types of chargers that must be installed) in both residential and nonresidential buildings. The 2025 CALGreen Code also includes required analysis of embodied carbon in building materials, which was not required under the 2022 CALGreen Code. Lastly, the 2025 CALGreen Code includes updates to energy efficiency standards aimed at further reducing energy consumption in buildings and promoting the use of renewable energy sources.

California Appliance Efficiency Requirements (Title 20)

These efficiency requirements apply to appliances sold in California to promote the use of energy- and water-efficiency appliances, setting standards for minimum levels of operating efficiency and other cost-effective measures. After standards are adopted, CEC informs stakeholders and manufacturers of the final appliance efficiency testing requirements, certification instructions, and procedures to comply with the standards. To be sold or offered for sale in California, appliance manufacturers selling their products are required to test them at CEC-approved laboratories and receive third-party certification. Once certified, manufacturers are required to submit their documentation and data to CEC to be uploaded into the agency's online Modernized Appliance Efficiency Database System. A regulated appliance that is not certified cannot be legally sold or offered for sale in California.

Legislation Associated with Greenhouse Gas Reduction

For details about legislation associated with GHG reduction, which has co-benefits related to reduced energy demand and increased energy efficiency, see the regulatory setting of Section 3.2, "Greenhouse Gas Emissions and Climate Change."

LOCAL

Sacramento Municipal Utility District

In July 2020, the Sacramento Municipal Utility District (SMUD) Board of Directors adopted a climate emergency declaration which committed to working toward an ambitious goal of delivering 100 percent zero-carbon electricity by 2030. The 2030 Clean Energy Vision is SMUD's overarching goal to reach zero-carbon emissions in its power supply by 2030. The 2030 Zero Carbon Plan, adopted March 30, 2021, is the roadmap for SMUD to achieve the zero-carbon goal through 100 percent renewable generation by 2030, 15 years in advance of the State-mandated Renewables Portfolio Standard. SMUD released the recent 2030 Zero Carbon Plan Progress Report in September 2024.

SMUD's 2022 Integrated Resource Plan (IRP) details the utility's long-term plan to meet the area's energy demand reliably and cost-effectively, while also meeting the various regulatory requirements, including GHG reduction targets and renewable energy procurement requirements. SB 350 (De León, Chapter 547, Statutes of 2015), (Public Utilities Code [PUC] Section 9622) requires CEC to review the IRP of identified publicly owned utilities to ensure they meet various requirements specified in the law. In 2024, CEC staff reviewed the 2022 IRP, which included the 2030 Zero Carbon Plan discussed above, for consistency with the requirements of PUC Section 9621 and ultimately concluded that the 2022 IRP (CEC 2024c):

- meets the GHG emission reduction requirements of PUC Section 9621(b)(1) and the renewable energy procurement requirement of PUC Section 9621(b)(2),
- meets planning goals related to retail rates, reliability, transmission, and distribution systems as set forth in PUC Section 9621(b)(3),
- considered the role of existing renewable generation, grid operational efficiencies, energy storage, and two distributed resources (including energy efficiency) in helping to ensure the utility's energy and reliability needs in the hours that encompass the peak hour as set forth in PUC Section 9621(c), and
- addressed the procurement requirements for energy efficiency and demand response, energy storage, transportation electrification, portfolio diversification, and resource adequacy as set forth in PUC Section 9621(d).

City of Elk Grove General Plan

The *City of Elk Grove General Plan* contains the following policies and standards related to energy that apply to the Plan (City of Elk Grove 2018):

- **Policy NR-6-1:** Promote energy efficiency and conservation strategies to help residents and businesses save money and conserve valuable resources.
- **Policy NR-6-3:** Promote innovation in energy efficiency.

- **Policy NR-6-5:** Promote energy conservation measures in new development to reduce on-site emissions and seek to reduce the energy impacts from new residential and commercial projects through investigation and implementation of energy efficiency measures during all phases of design and development.
- **Policy NR-6-6:** Encourage renewable energy options that are affordable and benefit all community members.
- **Policy NR-6-7:** Encourage the use of solar energy systems in homes, commercial businesses, and City facilities as a form of renewable energy.
- **Policy H-2-3:** Support energy-conserving programs in the production and rehabilitation of affordable housing to reduce household energy costs, improve air quality, and mitigate potential impacts of climate change in the region.
- **Policy ER-6-11:** Seek to provide the community with information relating to sustainability, climate change, and innovative development strategies.

City of Elk Grove Climate Action Plan

In February 2019, the City adopted the *City of Elk Grove Climate Action Plan 2019 Update* (2019 CAP), which was most recently amended in December 2024. The 2019 CAP includes GHG emission reduction targets as well as GHG emission reduction strategies and implementation measures to help the City reach these targets. The reduction strategies address GHG emissions associated with transportation and land use, energy, water, waste management and recycling, agriculture, and open space. Through implementation of all measures in the 2019 CAP, including State-mandated efforts, the City would achieve and exceed its reduction target of reaching 4.1 $MTCO_2e$ by 2030. However, even with all reduction measures implemented, annual 2050 per capita emissions would be 3 $MTCO_2e$ and remain above the 1.4 $MTCO_2e$ long-term goal set for 2050 (City of Elk Grove 2019: 4-3). As discussed in the 2019 CAP, "additional technological advances across multiple sectors would be required to reduce emission further, combined with additional regulatory actions at the State or federal levels." Further, the City "would need to identify new or modified GHG reduction measures that would achieve longer-term, post-2030 targets that may be set by the State or others in the future" (City of Elk Grove 2018: 5.7-37).

3.1.2 Environmental Setting

ENERGY TYPES AND SOURCES

Electricity is supplied to the city by SMUD, and natural gas by Pacific Gas and Electric Company (PG&E). California relies on a regional power system composed of a diverse mix of natural gas, renewable, hydroelectric, and nuclear generation resources. The state's transportation sector accounts for nearly two-fifths of California's total energy consumption. The industrial sector uses about one-fourth of the state's total energy, the residential sector accounts for one-fifth, and the commercial sector uses slightly less than one-fifth (EIA 2024). In 2023, renewable resources, including hydroelectric power and small-scale solar power, supplied 54 percent of California's in-state electricity generation. Natural gas fueled another 39 percent, and nuclear power provided almost all the rest (EIA 2024). In 2023, SMUD provided its customers enrolled in its base plan with 45 percent eligible renewable energy (i.e., biomass combustion, geothermal, small-scale hydroelectric, solar, and wind) and 33 percent and 22 percent from large-scale hydroelectric and natural gas, respectively (SMUD 2024). The contribution of in- and out-of-state power plants depends on the precipitation that occurred in the previous year, the corresponding amount of available hydroelectric power, and other factors.

ALTERNATIVE FUELS

A variety of alternative fuels (e.g., renewable natural gas, electricity, hydrogen, and renewable diesel) are used to reduce demand for petroleum-based fuel. The use of these fuels is encouraged through various statewide regulations and plans (e.g., Low Carbon Fuel Standard, 2022 Scoping Plan). See Section 3.2, "Greenhouse Gas Emissions and Climate Change," for additional information pertaining to these regulations and plans.

California has a growing number of alternative fuel vehicles through the joint efforts of the CEC, CARB, local air districts, federal government agencies, transit agencies, utilities, and other public and private entities. As of March 2025, there are 3,606 total EV chargers located in Sacramento County (CEC 2024a).

ENERGY USE FOR TRANSPORTATION

In 2022, the transportation sector comprised California's largest end-use energy sector, totaling 42.6 percent, followed by the industrial sector, totaling 22.5 percent, the residential sector 17.6 percent, and the commercial sector 17.4 percent (EIA 2024). The transportation sector uses approximately 90 percent of the petroleum consumed in the state (EIA 2024). CEC reported retail sales of 448 million and 45 million gallons of gasoline and diesel, respectively, in Sacramento County in 2021 (the most recent data available) (CEC 2024b).

ENERGY USE AND CLIMATE CHANGE

Scientists and climatologists have produced evidence that the burning of fossil fuels by vehicles, power plants, industrial facilities, residences, and commercial facilities has led to an increase in the Earth's temperature. For an analysis of GHG production and an evaluation of whether implementing the Climate Compass would result in an environmental impact related to climate change, see Section 3.2, "Greenhouse Gas Emissions and Climate Change."

3.1.3 Impact Analysis

SIGNIFICANCE CRITERIA

Thresholds of significance are based on Appendix G of the State CEQA Guidelines. The Plan would result in an impact on energy resources if it would:

- result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during construction or operation; or
- conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

METHODOLOGY

This Draft SEIR considers the broad environmental implications of implementing the Plan, on a conceptual basis, and does not provide a project-level assessment. Impacts related to energy were analyzed qualitatively based on a review of the strategies and actions contained in the Plan and their potential to result in physical changes to the environment if the Plan is approved and implemented. This issue area was analyzed in the context of existing laws and regulations, as well as policies adopted in the General Plan, and the extent to which these existing regulations and policies adequately address and minimize the potential for impacts associated with the implementation of the Plan. The impact analysis also focuses on whether approval and implementation of the Plan would result in new or more severe energy impacts than those disclosed in the General Plan EIR, as amended by the 2023 Subsequent EIR for the GPAs/VMT Standards Project.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

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**.

General Plan EIR and 2023 Subsequent EIR Determination

Regarding construction-related energy, the General Plan EIR determined that energy consumption would be temporary and, consequently, would not require additional capacity, increased peak, or base period demands for electricity or other forms of energy. Regarding operational energy impacts, the General Plan EIR concluded that land uses developed and operated under the General Plan would increase energy consumption. However, the General Plan EIR determined that impacts related to the wasteful, inefficient, or unnecessary consumption of energy would be less than significant. because future development under the General Plan would comply with applicable California energy efficiency and green building standards. In addition, the 2019 CAP set zero net energy requirements in 2020 and 2030 for residential and commercial development. However, in December 2024, the City amended the 2019 CAP to remove reference to the zero net energy standard for residential buildings and replaced it with a decreased energy emissions requirement (City of Elk Grove 2024).

The 2023 Subsequent EIR determined that implementation of the GPAs/VMT Standards Project would consume additional energy supplies during construction in the form of gasoline and diesel fuel consumption. However, this energy expenditure would not be considered wasteful compared to other construction projects. Operation of development facilitated by the GPAs/VMT Standards Project would also result in additional energy consumption but would be required to comply with the most recent California energy codes and subject to the energy efficiency actions of the 2019 CAP (Impact 3.4-1). Implementation of the GPAs/VMT Standards Project would be required to comply with these standards and, therefore, would not result in new or substantially more severe energy impacts than what was identified in the General Plan EIR. Therefore, it was determined that impacts would remain less than significant.

Proposed Climate Compass Impact Analysis

The Climate Compass is a policy-level document that does not include any land use or zoning changes; site-specific development, designs, or proposals; nor does it grant any entitlements for development that would result in environmental impacts. Rather, the Climate Compass would commit the City to more sustainably develop projects that could already occur under the General Plan, as amended. As a policy document, the Climate Compass requires increased electrification and decarbonization of buildings and infrastructure, increased renewable energy use and storage, reduced energy and resource consumption, improved clean and efficient transportation, strengthened resilience and adaptation measures, support for the green economy, and enhanced public education and outreach around climate issues.

To achieve the Climate Compass's GHG reduction and sustainability goals, the Plan contains GHG emissions reduction strategies and actions for both the community and City operations. The majority of the Plan's strategies and actions identify the need for the City to adopt new codes, ordinances, and development requirements to enforce more energy- or water-efficient building design and renewable energy infrastructure; transition City fleets and equipment to zero-emission and/or electric or decarbonized options; require the preparation of detailed plans to identify specific next steps to accomplish the long-term goals; and implement new programs to address regulatory compliance and improve City-provided services.

Once adopted, implementation of the Plan's strategies and actions may require construction and/or operational activities, which could result in environmental impacts related to energy consumption. The following analysis evaluates the potential for implementation of the proposed Climate Compass strategies and actions that may require construction and/or operation to result in wasteful, inefficient, or unnecessary consumption of energy resources.

Construction

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

Implementing these strategies and actions could increase electricity demand, consumption of fuels, and use of non-renewable resources during construction through using fuels for activities such as construction crew commutes, operation of construction equipment, and material delivery. Demand for energy resources during construction would vary throughout the construction period and generally cease upon completion. However, construction activities required for these are typically short-term and involve minor disturbances in previously developed areas. In addition, future projects implementing these Climate Compass strategies and actions would not involve large amounts of labor or extensive use of construction equipment, and as such, would not require significant worker or construction truck trips, which result in large amounts of energy consumption. Construction equipment (e.g., backhoes, front loaders, pavers, bulldozers, and skid steers) may also be used. Still, this equipment would likely be used intermittently and for relatively short periods, resulting in short-term diesel fuel and gasoline consumption. This energy expenditure would not be considered wasteful compared to other construction projects.

Furthermore, implementing Plan Actions FEC-2.2 and TR-3.2 would reduce fossil fuel consumption during construction. Action FEC-2.2 would develop a policy to require greater use of low- and zero-emission off-road vehicles and encourage electric equipment (e.g., landscaping, construction) for City-owned equipment, City-funded projects, and City contractors, reducing energy use. Implementing Action TR-3.2 would prohibit the use of fossil-fuel-powered generators at construction sites in all discretionary projects. These actions would help minimize fossil fuel combustion in construction equipment during the implementation of the other actions identified above.

Therefore, while construction activities would result in short-term energy consumption, implementation of the Climate Compass strategies and actions, such as Actions FEC-2.2 and TR-3.2, would minimize effects related to construction-related fossil fuel consumption.

Operation

Occasional operation and maintenance activities, such as maintenance vehicle use, equipment and facilities repair and replacement, tree watering and trimming, landscaping and vegetation management, and irrigation and water usage inspections, would be required in response to implementation of some actions included within the Climate Compass (e.g., Actions RA-5.2, RA-5.3, RA-6.1, RS-1.6, WW-1.1, and WW-1.2). These operation and maintenance activities would occur on an intermittent schedule, and a minimal basis, and would be anticipated to be accomplished with existing City personnel in conjunction with existing maintenance activities. While these types of maintenance and operation activities would result in energy consumption, energy use would be short-term and infrequent and would be made as efficient as feasible by utilizing energy-efficient technology, equipment, infrastructure, and fuels. Actions which would increase operational energy efficiency include Action 3.1, expands the use of recycled water that could be used for vegetation

watering, Action BF-3, involves auditing and replacing outdated HVAC systems in all existing City buildings with high-efficiency models, and Action FEC-2.2, develops a policy to require greater use of low- and zero-emissions off-road vehicles and encourage electric equipment, including City-owned landscaping equipment. Therefore, energy consumption associated with these types of operation and maintenance activities would be minimal.

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

In regard to reducing fuel consumption used in the transportation sector, the Plan requires the reduction of VMT in the Planning Area and for City employees (e.g., Strategy TR-1 and Actions TR-1.1 through TR-1.8; Strategy TR-2 and Actions TR-2.1 through TR-2.5). For a comprehensive list of all community transportation-related strategies, their associated actions, and the measurable outcomes related to their implementation, see Table 2-14 in Chapter 2, "Project Description." To further support the goals of a cleaner transportation sector, the Plan directs the city to provide alternative transportation programs and policies to incentivize the use of these services. For example, Action TR-1.2 establishes required coordination with Sacramento Regional Transit (SacRT) to improve the public transit system by increasing reliability and accessibility and adding amenities such as seating, lighting, tree cover, and real-time arrival information displays. This action also looks to extend service hours and routes, which would help to better serve residential areas, employment centers, and popular destinations. By increasing reliability and accessibility, more residents would use alternative transportation regularly, which would help reduce VMT while reducing fossil fuel consumption by using alternative transportation instead of single-occupant vehicles.

The strategies and actions of the Climate Compass would also reduce energy consumption related to the treatment and transport of water. For example, Action RC-3.4 requires the regular review and update of the City's Water Efficient Landscape Ordinance to comply with evolving State laws, ensuring water conservation and efficiency measures would be updated based on industry standards. Through these and similar actions, the Climate Compass would reduce operational energy consumption related to the processing and transport of water by increasing water efficiency. For a comprehensive list of all community water-related strategies, their associated actions, and the measurable outcomes related to their implementation, see Tables 2-14 and 2-16 in Chapter 2, "Project Description."

As stated previously, the majority of fossil fuel reductions and energy efficiency improvements under the Plan are attributable to community GHG reduction strategies and actions. However, the municipal GHG reduction strategies and actions detailed in Table 2-16 of Chapter 2, "Project Description," would achieve reductions of 2,501 $MTCO_2e$ in 2030 and 2,450 $MTCO_2e$ in 2045. These reductions would be achieved through strategies and actions similar to those identified above, such as Action BF-3.1, which proposes the development and adoption of a green building policy requiring all new municipal buildings to meet or exceed CALGreen Tier 1 standards, establishing requirements for energy-efficient design, renewable energy integration, water conservation, and sustainable materials use. Other reduction strategies and actions involve reducing VMT, and therefore fossil fuel consumption, associated with City employees (Strategy FEC-1 and Actions FEC-1.1 through FEC-1.8). Strategy FEC-2 and Actions FEC-2.1 and FEC-2.2 commit to shifting to clean on- and off-road municipal vehicles and equipment, further reducing fossil fuel consumption

related to City operations. Energy efficiency improvements would also be made through actions such as Action WW-1.2, which would involve upgrading all City irrigation systems to smart, weather-based systems that use real-time weather data and soil moisture sensors to optimize watering schedules and reduce overwatering, and additionally, develop a maintenance and monitoring program to ensure long-term efficiency. This would reduce energy consumption related to the transport and treatment of water used at City facilities.

For these reasons, while implementation of the Climate Compass may require energy consumption for operation and maintenance, implementation of the Plan's strategies and actions would not involve long-term physical changes that could result in wasteful, inefficient, or unnecessary energy consumption.

Implementation of the Climate Compass would require short-term construction and long-term operation and maintenance activities that would consume energy resources, especially in the form of fossil fuel combustion However, implementation of the Plan would, overall, reduce fossil fuel consumption within the Planning Area by increasing energy efficiency and conservation, utilizing renewable energy technology and sources, and transitioning to electrification, decarbonization, and near-zero and 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., natural gas combustion, diesel and gasoline use). Therefore, overall electricity demand is 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 Renewable Portfolio Standard, which SMUD must meet, would result in a broader availability of renewable energy (e.g., solar, wind, hydroelectric power) to meet this demand.

As stated above in Section 3.1.1, "Regulatory Setting," the 2022 IRP and CEC's review of the IRP demonstrates that SMUD is capable of accommodating 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.

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. As demonstrated above, implementation of the Climate Compass would not result in a new or substantially more severe energy impact than what was addressed in the General Plan EIR, as amended by the 2023 Subsequent EIR. Therefore, impacts related to the wasteful, inefficient, or unnecessary consumption of energy would remain **less than significant**.

Mitigation Measures

No mitigation is 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 EV charging and reduce VMT by enhancing roadway connectivity, increasing and improving bicycle and pedestrian infrastructure, and improving 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**.

General Plan EIR and 2023 Subsequent EIR Determination

The General Plan EIR evaluated the consistency of land uses proposed under the General Plan against applicable renewable energy and energy efficiency plans, including the 2019 CAP. The General Plan EIR concluded that because several of the 2019 CAP measures would result in reduced energy demand and reduced GHG emissions, the General Plan would be consistent with the 2019 CAP. The 2019 CAP, though designed to reduce GHG emissions, concurrently played a role in improving energy efficiency and enhancing renewable energy resources and thus would be considered a plan for renewable energy or energy efficiency. Therefore, the General Plan 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 2023 Subsequent EIR determined that while implementation of the GPAs/VMT Standards Project could increase energy demands, future development would be required to comply with the requirements of the California Energy Code and the measures of the 2019 CAP related to energy efficiency, which would reduce overall energy demand (Impact 3.4-2). As a result, implementation of the GPAs/VMT Standards Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, the Subsequent EIR determined that the GPAs/VMT Standards Project would not result in a new or substantially more severe impact than what was identified in the General Plan EIR and impacts would remain less than significant.

Proposed Climate Compass Impact Analysis

While the Climate Compass's overarching objective is to reduce GHG emissions, strategies and actions in the Climate Compass have the co-benefit of increasing energy efficiency, reducing the use of fossil fuels, and requiring increased renewable energy generation. Strategies BE-1, "Electrify and Decarbonize Buildings," and BE-4, "Reduce Energy Consumption and Energy Burden," and subsequent actions (BE-1.1 through BE-1.5 and BE-4.1 through BE-4.3) would result in decreased dependency on natural gas within the community building sector, while promoting energy efficiency through adherence to voluntary standards of the CALGreen Code and partnerships with SMUD. Similarly, Strategy BE-3, "Increase Local Renewable Energy Use and Storage," and its supporting actions (i.e., BE-3.1 and BE-3.2) would both reduce indirect GHG emissions in the community from the use of renewable energy systems and promote the availability of renewable energy generation within the city. Examples of measurable outcomes under these strategies include the requirement for 50 percent of new residential development to be all electric by 2030 and 100 percent by 2045 under BE-1, and 100 percent carbon-free electricity for all end uses in the city by 2030 and continuing through 2045 under BE-3. Energy consumption from the community's transportation sector (i.e., gasoline and diesel fuel) would also be reduced through Strategies TR-1, "Decrease Vehicle Miles Traveled," TR-2, "Increase Zero-Emission Vehicle Adoption," and TR-3, "Reduce Off-Road Transportation Emissions." Strategy TR-1 requires that a 2.3 percent VMT reduction must be achieved by 2030 through transit system upgrades and a 15 percent VMT reduction by 2045, while a 1 percent reduction in commute VMT must be achieved by 2030 through the development of a local Transportation Management Agency, continuing through 2045. Strategy TR-2 requires the transition to 25 percent light-duty electric

and plug-in hybrid electric vehicles by 2030 and 87 percent by 2045, as well as an increase in commercial EVs by 65 percent by 2030 and 90 percent by 2045. These strategies would require the deployment of EV charging infrastructure and incentive opportunities, as well as investments to enhance the city's bicycle, pedestrian, and trails network; public transit; and electric bike purchases through additional charging infrastructure and rebate programs.

As discussed above, reductions in fossil fuel consumption and improvements in energy efficiency would also occur through strategies and actions related to City operations, though to a lesser degree than fossil fuel reductions and energy efficiency improvements from community-focused strategies and actions. Examples include Strategy FEC-1**,** **"**Reduce COEG Employee Commute VMT," and Strategy FEC-2, "Shift to Clean On-Road and Off-Road Vehicles and Equipment," and subsequent actions (Actions FEC-1.1 through FEC-1.8 and FEC-2.1 through 2.2). These strategies and actions would result in shifting to clean on- and off-road municipal vehicles and equipment, launching an annual VMT reduction challenge for City employees, developing a local Transportation Management Agency to reduce VMT, establishing an e-bike lending library for City employees to use as an alternative to vehicle use, partnering with the Sacramento Regional Transit District to establish a program offering monthly public transit passes to City employees, and establishing a ride home program that would provide rides for City employees in the form of vouchers for rideshare or taxi services up to a certain number of times per year. Additionally, Strategy BF-1 would reduce fossil fuel consumption in City buildings and facilities through actions such as Action BF-1.3, which would involve conducting a feasibility study and cost analysis of replacing the natural gas–powered pool heating system at the Aquatics Center with an electric, or other zero emission, heating system, and based on findings, implement the replacement as soon as feasibly possible.

By implementing these strategies, the Plan would be consistent with and support a variety of State and local plans, policies, and regulations that aim to reduce fossil-fuel consumption by improving energy efficiency and reducing per-capita energy consumption. The plans, policies, and regulations with which the Climate Compass would be consistent include the SACOG 2020 MTP/SCS, California Green Building Standards Code, 2023 IEPR, SB 1020, AB 1279, EO N-79-20, SMUD's 2030 Zero Carbon Plan and 2022 IRP, and Appendix D of the 2022 Scoping Plan.

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 an 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 above would improve energy efficiency and reduce energy demand (e.g., Action BF-3.1 and Action BF-3.3) as well as decrease transportation-related fossil fuel consumption (e.g., Action FEC-1.8 and Action FEC-1.3), and would specifically align with the overarching goals of improved energy efficiency and reliance on renewable energy systems enumerated in the aforementioned plans. Therefore, the Climate Compass would not conflict with any state or local plan for renewable energy or energy efficiency over what was already disclosed in the General Plan EIR and the 2023 Subsequent EIR. As such, implementation of the Climate Compass would not result in a new or substantially more severe impact than what was identified in the General Plan EIR, as amended by the 2023 Subsequent EIR. Therefore, impacts related to conflicting with or obstructing any State or local plans for renewable energy or energy efficiency would remain **less than significant**.

Mitigation Measures

No mitigation is required.

3.2 GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

This section presents a summary of the current state of climate change science and greenhouse gas (GHG) emissions sources in California; a summary of applicable regulations; a discussion of the quantified GHG emissions from the Climate Compass (Plan); and a discussion of the Plan's potential contribution to global climate change. This section also describes the existing conditions for GHG emissions within the City of Elk Grove (city) General Plan Planning Area, which includes all land within the current city limits as well as the study areas (Planning Area) outside the city limits and evaluates the potential effects that implementation of the Climate Compass may have on GHG emissions and climate change. Energy impacts are evaluated in Section 3.1, "Energy," of this Draft SEIR.

For the purposes of this analysis, GHG emissions are measured as metric tons of carbon dioxide equivalent ($MTCO_2e$). The atmospheric impact of a GHG is based on that gas's global warming potential (GWP). GWP is a measure of the heat-trapping ability of one unit of a gas over a specific timeframe relative to one unit of carbon dioxide (CO_2). The GWP of CO_2 is one (EPA 2025). The GHG calculations that comprise the emissions reduction targets, inventory, and projections of the Climate Compass use GWP values from the Intergovernmental Panel on Climate Change's (IPCC's) Sixth Assessment Report (GHG Protocol 2024).

Comments concerning GHGs were received from the Sacramento Metropolitan Air Quality Management District (SMAQMD) during the NOP scoping process regarding consideration of how the Plan would meet requirements for cooking appliances, space heating, and water heating appliances as a means to achieving full building electrification; consideration of requirements regarding the addition of solar photovoltaic canopies over new parking lots as a new design standard; and consideration of the addition of a new measure that installs pedestrian-friendly infrastructure throughout Elk Grove to support active transportation. Comments from city residents expressed support for the Climate Compass, specifically about the Plan's building energy and transportation focus areas.

Relevant information from the General Plan Environmental Impact Report (EIR) (SCH No. 2017062058), as amended in 2023 by the Subsequent EIR for to the General Plan EIR (2023 Subsequent EIR) for the General Plan Amendments and Update of Vehicle Miles Traveled Standards Project (GPAs/VMT Standards Project) (SCH No. 2022020463), has been incorporated into this section as applicable and necessary.

3.2.1 Regulatory Setting

FEDERAL

In *Massachusetts et al. v. Environmental Protection Agency et al.*, 549 U.S. 497 (2007), the Supreme Court of the United States concluded that CO_2 is an air pollutant as defined under the federal Clean Air Act (CAA) and that the US Environmental Protection Agency (EPA) has the authority to regulate GHG emissions. In 2010, EPA started to address GHG emissions from stationary sources through its New Source Review permitting program, including operating permits for "major sources" issued under Title V of the CAA.

Commercial Trucks and Buses Standards

The EPA and the National Highway Traffic Safety Administration (NHTSA) have set fuel economy and greenhouse gas (GHG) emission standards for medium- and heavy-duty vehicles. In 2011, EPA and NHTSA finalized a joint rule that established a national program to reduce GHG emissions and improve the fuel economy for new medium- and heavy-duty vehicles manufactured in model years 2014 through 2018. In 2016, EPA and NHTSA finalized Phase 2 standards, which require fuel efficiency improvements and pollution reduction for medium- and heavy-duty vehicles, model years 2019 through 2027. On March 29, 2024, a final rule was issued to revise existing standards to reduce GHG emissions from heavy-duty vehicles in model year 2027 and set new, more stringent standards for model years 2028 through 2032 (EPA 2024).

Non-Road Compression-Ignition Engine Standards

EPA established a series of increasingly strict emission standards for new non-road diesel engines. Tier 1 standards were phased in on newly manufactured equipment from 1996 through 2000, depending on the engine horsepower category. Tier 2 standards were phased in on newly manufactured equipment from 2001 through 2006. Tier 3 standards were phased in on newly manufactured equipment from 2006 through 2008. Tier 4 standards, which require advanced emission control technology to attain them, were phased in between 2008 and 2015 (EPA 2025).

STATE

Statewide GHG Emission Targets and Climate Change Scoping Plan

Reducing GHG emissions in California has been the State government's focus for approximately two decades. GHG emission targets established by the State legislature include reducing statewide GHG emissions to 1990 levels by 2020 (Assembly Bill [AB] 32 of 2006) and reducing them to 40 percent below 1990 levels by 2030 (Senate Bill [SB] 32 of 2016).

These targets were superseded by the enactment of AB 1279 in 2022, which establishes the policy of the state to achieve carbon neutrality as soon as possible, but no later than 2045; to maintain net negative GHG emissions thereafter; and to ensure that by 2045, statewide anthropogenic GHG emissions are reduced by at least 85 percent below 1990 levels.

CARB released the Final 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) on November 16, 2022, as directed by AB 1279 (CARB 2022). The 2022 Scoping Plan traces the pathway for the State to achieve the goals set forth in AB 1279 and includes several regulations, plans, and policies directed to reduce energy consumption, improve energy efficiency, and increase renewable energy resources within the State. CARB adopted the 2022 Scoping Plan on December 16, 2022.

As summarized below, the State has also passed more detailed legislation addressing GHG emissions associated with transportation, solid waste, electricity generation, and energy consumption.

Transportation-Related Standards and Regulations

As part of its Advanced Clean Cars program, CARB established more stringent GHG emission standards and fuel efficiency standards for fossil fuel–powered on-road vehicles than EPA. In addition, the program's zero-emission vehicle (ZEV) regulation required battery, fuel cell, and plug-in hybrid electric vehicles (EVs) to account for up to 15 percent of California's new vehicle sales by 2025. The Advanced Clean Cars II (ACC II) Program was adopted by CARB in August 2022 and provides the regulatory framework for ensuring the sales requirement goal of EO N-79-20 to ultimately reach 100 percent ZEV sales in the state by 2035 (CARB 2025). To support increased EV use, AB 2127 requires the California Energy Commission (CEC) to biennially assess the EV charging infrastructure needed to meet the state's goals of putting at least 5 million zero-emission vehicles on California roads by 2030 and reducing GHG emissions to 40 percent below 1990 levels by 2030.

CARB adopted the Low Carbon Fuel Standard (LCFS) in 2007 to reduce California's transportation fuels' carbon intensity (CI). Low-CI fuels emit less CO_2 than other fossil fuel–based fuels such as gasoline and fossil diesel. The LCFS applies to fuels used by on-road motor vehicles and off-road vehicles, including construction equipment (Wade, pers. comm., 2017).

CARB adopted the Advanced Clean Trucks Regulation in June 2020, which aims to accelerate the sales of heavy-duty EVs and consists of two parts: a manufacturer component and a fleet reporting component. Manufacturers are required to sell an increasing percentage of heavy-duty zero-emission vehicles between 2024 and 2035. By 2035, 40 percent of Class 8 truck purchases will be required to be zero-emission. Fleets with 50 or more vehicles will be required to report on their fleet's composition and activities to inform CARB in crafting new strategies to hasten the adoption of ZEVs (CARB 2020).

CARB's 2022 Advanced Clean Fleets (ACF) regulation was developed to reduce diesel particulate matter (PM) by transitioning medium- and heavy-duty trucks to fully electric by 2045. At the time of the writing of this Draft SEIR,

California has withdrawn its request for a waiver and authorization for the addition of the ACF regulation to its emissions control program (CARB 2025b). CARB is not enforcing the existing portions of the ACF regulation that require a federal waiver or authorization, such as those of the ACF regulation that apply to high-priority and drayage fleets. However, not all elements of the ACF regulation require a federal waiver or authorization (CARB 2025b). The State and local government fleets portion of the ACF regulation remain unaffected.

CARB's Innovative Clean Transit (ICT) regulation (13 CCR Section 2023) requires all public transit agencies to transition to a 100 percent zero-emissions bus fleet gradually and encourages them to provide innovative first and last mile connectivity and improved mobility for transit riders. The ICT regulation requires that 25 percent of new bus purchases for large transit agencies be zero-emission starting in 2023, extending to 100 percent in 2029. ICT requires that 25 percent of small transit agencies' new bus purchases be zero-emission, starting in 2026, extending to 100 percent in 2029.

In addition to tailpipe emissions and transportation fuels, the State legislature has passed regulations to reduce the amount on-road vehicles are driven. Since passage of SB 375 in 2008, CARB requires metropolitan planning organizations (MPOs) to develop and adopt sustainable communities strategies (SCSs) as a component of the federally prepared regional transportation plans (RTPs) to show reductions in GHG emissions from passenger cars and light-duty trucks in their respective regions for 2020 and 2035. These plans link land use and housing allocation to transportation planning and related mobile-source emissions. The Sacramento Area Council of Governments (SACOG) serves the Planning Area as the MPO for Sacramento, Placer, El Dorado, Yuba, Sutter, and Yolo counties, excluding those lands located in the Tahoe Basin. SACOG completed and adopted its most recent 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS), demonstrating that it achieved its targets in November 2019. In October of 2020, CARB prepared the *Evaluation of the Sacramento Area Council of Governments' SB 375 2020 Sustainable Communities Strategy* where CARB staff reviewed and ultimately accepted SACOG's determination that its 2020 SCS would meet the target of a 19 percent reduction by 2035, compared to 2005 levels (CARB 2020). SACOG is currently preparing the 2025 Blueprint, which aims to achieve various federal, state, regional, and local policy objectives related to development, transportation, and GHG emission reduction while considering financial, growth, and regulatory constraints. The 2025 Blueprint update revisits the regional growth projections, development patterns, and transportation investments that served as the foundation of the 2020 MTP/SCS.

Legislation Associated with Electricity Generation

The State has passed legislation requiring the increasing use of renewables to produce consumer electricity. California utilities are required to generate 52 percent of their electricity from renewables by 2027 (SB 100 of 2018); 60 percent by 2030 (also SB 100 of 2018); and 100 percent by 2045 (also SB 100 of 2018). On September 16, 2022, SB 1020 was signed into law. This bill supersedes the goals of SB 100 by requiring 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.

California Building Energy Efficiency Standards (Title 24, Part 6)

California's energy consumption by new residential and nonresidential buildings is regulated by the California Code of Regulations Title 24, Part 6, Building Energy Efficiency Standards (California Energy Code). CEC updates the California Energy Code every three years with more stringent design requirements for reduced energy consumption, resulting in fewer GHG emissions. The 2022 California Energy Code went into effect on January 1, 2023. The 2022 California Energy Code advances the energy conservation and onsite energy generation progress started in the 2019 California Energy Code by encouraging electric heat pump technology and use, establishing electric-ready requirements when natural gas is installed, expanding solar photovoltaic (PV) system and battery storage standards, and strengthening ventilation standards to improve indoor air quality. CEC estimates that the 2022 California Energy Code will save consumers $1.5 billion and reduce GHGs by 10 million metric tons of carbon dioxide-equivalent over the next 30 years (CEC 2022).

The 2025 Building Energy Efficiency Standards (2025 California Energy Code) were adopted on September 11, 2024, and will go into effect on January 1, 2026. According to CEC, the 2025 California Energy Code puts particular emphasis

on encouraging efficient electric heat pump technology for space and water heating in newly constructed single-family, multifamily, and select nonresidential building types, replacing end-of-life rooftop heating, ventilation, and air-conditioning units of a specific size with high efficiency systems, establishing electric-ready requirements for commercial kitchens and some multifamily buildings, updating solar and storage standards for buildings to make clean energy available for onsite use while minimizing exports to the electrical grid, and increasing ventilation standards to improve indoor air quality in multifamily buildings. CEC estimates that the 2025 California Energy Code is projected to save $4.8 billion in energy costs over its lifetime and reduce GHG by about 4 million metric tons, equivalent to the annual energy consumption of over half a million homes (CEC 2024a).

California Green Building Standards

The California Green Building Standards Code, also known as the CALGreen Code, is a portion of the California Building Code developed by CEC that consists of both voluntary and mandatory requirements related to green building standards for statewide residential and nonresidential construction. The voluntary provisions of the CALGreen Code often guide the adoption of local reach codes by incorporated cities and unincorporated counties. The current version is the 2022 CALGreen Code, which took effect on January 1, 2023. Compared to the 2019 CALGreen Code, the 2022 CALGreen Code strengthened sections pertaining to EV and bicycle parking, water efficiency and conservation, and material conservation and resource efficiency, among other sections of the CALGreen Code. The CALGreen Code sets design requirements equivalent to or more stringent than those of the California Energy Code for energy efficiency, water efficiency, waste diversion, and indoor air quality. These codes are adopted by local agencies that enforce building codes and are used as guidelines by State agencies for meeting the requirements of EO B-18-12.

The 2025 CALGreen Code was adopted on September 11, 2024, and goes into effect on January 1, 2026. Relative to the 2022 CALGreen Code, the 2025 version includes increased requirements for EV charging infrastructure (i.e., a higher percentage of parking spaces that must be equipped with EV chargers and more stringent requirements for the types of chargers that must be installed) in both residential and non-residential buildings. The 2025 CALGreen Code also includes required analysis of Embodied Carbon in Building Materials, which was not required under the 2022 CALGreen Code. Lastly, the 2025 CALGreen Code includes updates to energy efficiency standards aimed at further reducing energy consumption in buildings and promoting the use of renewable energy sources.

Senate Bill 1383 and the Short-Lived Climate Pollutant Reduction Strategy

In September 2016, SB 1383 (Lara, Chapter 395, Statutes of 2016) was signed into law, establishing methane emissions reduction targets in a statewide effort to reduce emissions of short-lived climate pollutants in various sectors of California's economy. Regarding solid waste, SB 1383 establishes targets to achieve a 75 percent reduction in the volume of statewide disposal of organic waste by 2025. The law grants the California Department of Resources Recycling and Recovery regulatory authority required to achieve the organic waste disposal reduction targets. It established an additional target: not less than 20 percent of currently disposed edible food is to be recovered for human consumption by 2025.

Assembly Bill 1346

On October 9, 2021, AB 1346 was signed by Governor Newsom. AB 1346 prohibits the sale of new gasoline-powered equipment under 25 gross horsepower (known as small off-road engines [SOREs]) as of January 1, 2024. SOREs are primarily used in gas-powered lawn equipment, such as leaf blowers, lawnmowers, chainsaws, and pressure washers, but also extend to generators and other emergency response equipment. The bill does not ban the operation of SOREs already owned or purchased prior to 2024.

LOCAL

Sacramento Metropolitan Air Quality Management District

SMAQMD is the primary agency responsible for addressing air quality concerns in Sacramento County. SMAQMD recommends methods for analyzing project-generated GHGs in CEQA analyses and offers potential GHG reduction actions for land use development projects. SMAQMD developed thresholds of significance to provide a uniform scale

to measure the significance of GHG emissions from land use and stationary source projects in compliance with CEQA to align with the statewide GHG target of 40 percent below 1990 levels by 2030, with the passage of SB 32 for land use development projects (SMAQMD 2021).

SMAQMD also provides guidance for program-level analysis of general plans and area plans. SMAQMD recommends that program-level analyses "incorporate development policies, standards, and mitigation actions achieving GHG reductions that result in a less-than-significant impact with respect to GHG emissions, this could alleviate the need to evaluate and mitigate GHGs at the project level for projects that are found to be consistent with the general or area plan" (SMAQMD 2020). This recommendation for program-level analysis can be satisfied through the development of a qualified climate action plan (CAP) (i.e., a GHG reduction plan meeting the criteria of the State CEQA Guidelines Section 15183.5[b]) that accompanies a general plan.

In March of 2024, SMAQMD submitted its Capital Region Climate Priorities Plan (CRCPP) under EPA's Climate Pollution Reduction Grants (CPRG) program. The CRCPP outlines 24 climate measures that would create substantial GHG emission reductions and co-benefits, including advancing equity and opportunities in the clean energy transition. The CRCPP encourages infill development, building electrification and vehicle decarbonization, active modes of transportation, energy resiliency, carbon sequestration, and forest and ecosystem health. The CRCPP is intended to guide the Sacramento region closer to carbon neutrality by 2030 by advancing electric power sector improvements, especially regarding renewable energy deployments and battery storage.

Sacramento Municipal Utility District

In July 2020, the Sacramento Municipal Utility District (SMUD) Board of Directors adopted a climate emergency declaration committed to working toward an ambitious goal of delivering zero-carbon electricity by 2030. The 2030 Clean Energy Vision is SMUD's overarching goal to reach zero-carbon emissions in its power supply by 2030. The 2030 Zero Carbon Plan, adopted March 30, 2021, is the roadmap for SMUD to achieve the zero-carbon goal through 100 percent renewable generation by 2030, 15 years in advance of the State-mandated Renewables Portfolio Standard (SMUD 2021). SMUD released the recent 2030 Zero Carbon Plan Progress Report in September 2024 (SMUD 2024).

SMUD's 2022 Integrated Resource Plan (IRP) details the utility's long-term plan to meet the area's energy demand reliably and cost-effectively, while also meeting the various regulatory requirements, including GHG reduction targets and renewable energy procurement requirements. SB 350 (De León, Chapter 547, Statutes of 2015), (Public Utilities Code [PUC] Section 9622) requires CEC to review the IRP of identified publicly owned utilities to ensure they meet various requirements specified in the law. In 2024, CEC staff reviewed the 2022 IRP, which included the 2030 Zero Carbon Plan discussed above, for consistency with the requirements of PUC Section 9621 and ultimately concluded that the 2022 IRP (CEC 2024b):

- meets the GHG emission reduction requirements of PUC Section 9621(b)(1) and the renewable energy procurement requirement of PUC Section 9621(b)(2);
- meets planning goals related to retail rates, reliability, transmission, and distribution systems as set forth in PUC Section 9621(b)(3);
- considered the role of existing renewable generation, grid operational efficiencies, energy storage, and two distributed resources (including energy efficiency) in helping to ensure the utility's energy and reliability needs in the hours that encompass the peak hour as set forth in PUC Section 9621(c); and
- addressed the procurement requirements for energy efficiency and demand response, energy storage, transportation electrification, portfolio diversification, and resource adequacy as set forth in PUC Section 9621(d).

City of Elk Grove General Plan

The *City of Elk Grove General Plan* contains the following goals and policies related to GHG emissions and climate change that apply to the Plan (City of Elk Grove 2019a):

- **Policy NR-4-3:** Implement and support programs that reduce mobile source emissions.

- **Policy NR-4-4**: Promote pedestrian/bicycle access and circulation to encourage residents to use alternative modes of transportation in order to minimize direct and indirect emissions of air contaminants.
- **Policy NR-4-5:** Emphasize demand management strategies that seek to reduce single-occupant vehicle use in order to achieve State and federal air quality plan objectives.
- **Policy NR-4-6**: Offer a public transit system that is an attractive alternative to the use of private motor vehicles.

GOAL NR-5: Reduced Greenhouse Gas Emissions That Align With Local, State, And Other Goals

- **Policy NR-5-1:** By 2030, reduce per capita emissions greenhouse gas emissions to 4.1 $MTCO_2e$. By 2050, reduce per capita greenhouse gas emissions 1.4 $MTCO_2e$ to meet the State's 2050 greenhouse gas emissions reduction goals.
- **Policy NR-5-2:** Improve the health and sustainability of the community through improved regional air quality and reduction of greenhouse gas emissions that contribute to climate change.
- **Policy NR-5-3:** Support efforts by the Sacramento Metropolitan Air Quality Management District and the California Air Resources Board to decrease greenhouse gas emissions from stationary sources.
- **Policy NR-5-4:** Preserve, protect, and enhance, as appropriate, the community's carbon sequestration resources to improve air quality and reduce net carbon emissions.

GOAL NR-6: Reduced Energy Demand And Increased Renewable Sources

- **Policy NR-6-1:** Promote energy efficiency and conservation strategies to help residents and businesses save money and conserve valuable resources.
- **Policy NR-6-2**: Improve energy efficiency by identifying savings measures for City facilities in building materials and operations.
- **Policy NR-6-3:** Promote innovation in energy efficiency.
- **Policy NR-6-5:** Promote energy conservation measures in new development to reduce on-site emissions and seek to reduce the energy impacts from new residential and commercial projects through investigation and implementation of energy efficiency measures during all phases of design and development.
- **Policy NR-6-6:** Encourage renewable energy options that are affordable and benefit all community members.
- **Policy NR-6-7:** Encourage the use of solar energy systems in homes, commercial businesses, and City facilities as a form of renewable energy.

GOAL SD-2: Green Building

- **Policy SD-2-1:** Incorporate green building techniques and best management practices in the site design, construction, and renovation of all public projects.
- **Policy H-2-3:** Support energy-conserving programs in the production and rehabilitation of affordable housing to reduce household energy costs, improve air quality, and mitigate potential impacts of climate change in the region.
- **Policy ER-6-11:** Seek to provide the community with information relating to sustainability, climate change, and innovative development strategies.

City of Elk Grove Climate Action Plan

In February 2019, the City adopted the *City of Elk Grove Climate Action Plan 2019 Update* (2019 CAP), which was most recently amended in December 2024. The 2019 CAP includes GHG emission reduction targets as well as GHG emission reduction strategies and implementation measures to help the City reach these targets. The reduction strategies address GHG emissions associated with transportation and land use, energy, water, waste management and recycling, agriculture, and open space. Through implementation of all measures in the 2019 CAP, including State-mandated efforts, the City would achieve and exceed its per capita reduction target of 4.1 $MTCO_2e$ by 2030. However, even with all reduction measures implemented, annual 2050 per capita emissions would be 3 $MTCO_2e$ and remain above the 1.4 $MTCO_2e$ long-term goal set for 2050 (City of Elk Grove 2019b: 4-3). As discussed in the 2019 CAP, "additional

technological advances across multiple sectors would be required to reduce emission further, combined with additional regulatory actions at the State or federal levels." Further, the City "would need to identify new or modified GHG reduction measures that would achieve longer-term, post-2030 targets that may be set by the State or others in the future" (City of Elk Grove 2018: 5.7-37).

3.2.2 Environmental Setting

GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

Certain gases in the earth's atmosphere, classified as GHGs, play a critical role in determining the earth's surface temperature. Solar radiation enters the atmosphere from space. A portion of the radiation is absorbed by the earth's surface, and a smaller portion of this radiation is reflected toward space. The absorbed radiation is then emitted from the earth as low-frequency infrared radiation. Most solar radiation passes through GHGs; however, infrared radiation is absorbed by these gases. As a result, radiation that otherwise would have escaped back into space is instead "trapped," resulting in a warming of the atmosphere. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate on Earth.

Prominent GHGs contributing to the greenhouse effect are CO_2, methane, nitrous oxide (N_2O), hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. Human-caused emissions of these GHGs in excess of natural ambient concentrations are found to be responsible for intensifying the greenhouse effect and leading to a trend of unnatural warming of the earth's climate, known as global climate change or global warming. The likely range of human-induced warming in global-mean surface air temperature (GSAT) in 2010–2019 relative to 1850–1900 is 0.8°C–1.3°C, encompassing the observed warming of 0.9°C–1.2°C, while the change attributable to natural forcings is only −0.1°C to +0.1°C. It is very likely that human-induced greenhouse gas increases were the main driver of tropospheric warming since comprehensive satellite observations started in 1979, and virtually certain that human-induced greenhouse gas forcing is the primary driver of the observed changes in hot and cold extremes on the global scale (IPCC 2021).

Climate change is a global problem. GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants, which are pollutants of regional and local concern. Whereas most pollutants with localized air quality effects have relatively short atmospheric lifetimes (approximately 1 day), GHGs have long atmospheric lifetimes (1 year to several thousand years). GHGs persist in the atmosphere long enough to be dispersed around the globe. Although the lifetime of any GHG molecule depends on multiple variables and cannot be determined with any certainty, it is understood that more CO_2 is emitted into the atmosphere than is sequestered by ocean uptake, vegetation, and other forms of sequestration. Of the total annual human-caused CO_2 emissions, approximately 56 percent are estimated to be sequestered through ocean and land uptake every year, averaged over the last 50 years, whereas the remaining 44 percent of human-caused CO_2 emissions remain stored in the atmosphere (IPCC 2023).

The quantity of GHGs in the atmosphere responsible for climate change is not precisely known, but it is considered to be enormous. No single project alone would measurably contribute to an incremental change in the global average temperature or to global or local climates or microclimates. From the standpoint of CEQA, GHG impacts relative to global climate change are inherently cumulative.

Greenhouse Gas Emissions Sources and Sinks

Emissions of CO_2 are byproducts of fossil fuel combustion. Methane, a highly potent GHG, primarily results from off-gassing (the release of chemicals from nonmetallic substances under ambient or greater pressure conditions) and is largely associated with agricultural practices, landfills, and forest fires. N_2O is also largely attributable to agricultural practices and soil management. CO_2 sinks, or reservoirs, include soil, vegetation, and the ocean, which absorb CO_2 through sequestration and dissolution (CO_2 dissolving into the water) and are two of the most common processes for removing CO_2 from the atmosphere.

GREENHOUSE GAS EMISSION SOURCES

In 2022, statewide emitting activities accounted for 371.1 million metric tons of CO_2-equivalent ($MMTCO_2e$), 10.2 $MMTCO_2e$ lower than 2021 levels and 59.9 $MMTCO_2e$ below the 2020 GHG limit of 431 $MMTCO_2e$ (CARB 2024a). In 2014, statewide GHG emissions dropped below the 2020 GHG limit and have remained below the limit since that time. Overall trends in the *California Greenhouse Gas Emissions from 2000 to 2022: Trends of Emissions and Other Indicators* demonstrate that the CI of California's economy (the amount of carbon emissions per million dollars of gross state product [GSP]) is declining. From 2000 to 2022, the CI of California's economy decreased by 54.8 percent while the GSP increased by 77.5 percent. California's GSP increased 0.7 percent in 2022. Emissions per GSP declined by 3.1 percent from 2021 to 2022 (CARB 2024b). Overall trends in the AB 32 GHG Inventory also continue to demonstrate that the CI of California's economy is declining. The continuation of the downward GHG emissions trend from 2021 to 2022 indicates that the increase in emissions from 2020 to 2021 is likely an anomaly caused by broader economic trends related to the COVID-19 pandemic and associated recovery (CARB 2024b).

As discussed previously, GHG emissions are attributable in large part to human activities. In California, the transportation, industry, and electricity generation sectors are the largest GHG emission producers (Table 3.2-1).

Table 3.2-1 Statewide GHG Emissions by Economic Sector (2022)

Sector	Percent
Transportation	39
Industrial	23
Electricity generation (in state)	11
Electricity generation (imports)	5
Agriculture	8
Residential	8
Commercial	6
Not specified	<1

Source: CARB 2024c.

Within the Planning Area, on-road transportation, and building energy (including residential and nonresidential), constitute the greatest sources of community-generated GHG emissions (Table 3.2-2). For municipal operations, buildings and facilities, streetlights and traffic signals, employee commutes, and the City's vehicle fleet comprise the majority of the GHG emissions (Table 3.2-3).

Table 3.2-2 2021 Elk Grove Community GHG Emissions Inventory

Sector	GHG Emissions ($MTCO_2e$)	Percent of Total
On-Road Transportation	586,220	56%
Building Energy (Includes Residential and Nonresidential)	398,365	38%
Solid Waste	20,222	2%
Off-Road Vehicles and Equipment	18,341	2%
Wastewater Treatment	2,957	<1%
Water Supply	2,802	<1%
Agriculture	10,275	1%
Total	**1,039,181**	**100%**

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

Source: City of Elk Grove 2024: Table 2-2.

Table 3.2-3 2021 Elk Grove City Operations GHG Emissions Inventory

Sector	$MTCO_2e$	Percent of Total
Buildings and Facilities	1,741	41%
Streetlights and Traffic Signals	893	21%
Employee Commute	835	20%
Vehicle Fleet	620	14%
Solid Waste	139	3%
Water Supply	9	<1%
Wastewater Treatment	7	<1%
Process and Fugitive Emissions	32	1%
Total	**4,275**	**100%**

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

Source: City of Elk Grove 2024.

3.2.3 Impact Analysis

METHODOLOGY

The Climate Compass is a policy document that does not propose specific future projects. Therefore, this draft SEIR considers the broad environmental implications of implementing the Climate Compass conceptually and does not provide a project-level assessment. Impacts related to GHG emissions and climate change are based on the Climate Compass's strategies and actions as well as the quantified GHG emissions inventory, forecasts, and targets, and their potential to result in physical changes to the environment if the Plan is implemented. Impacts related to GHG emissions and climate change were analyzed in the context of existing laws and regulations, as well as policies adopted in the General Plan, and the extent to which these existing regulations and policies adequately address and minimize the potential for impacts associated with the implementation of the Climate Compass. The impact analysis also focuses on whether approval and implementation of the Climate Compass would result in new or more severe GHG impacts than those disclosed in the General Plan EIR, as amended by the 2023 Subsequent EIR for the GPAs/VMT Standards Project.

While the Climate Compass would update and replace the City's current Climate Action Plan (i.e., 2019 CAP), the city's CAP is not included as an element of the General Plan; instead, the 2019 CAP was programmatically evaluated alongside the General Plan in the General Plan EIR as two separate documents. However, because the Climate Compass would provide the policy framework to address the city's GHG emissions reduction goals for the Planning Area as established in the General Plan, as amended, the Plan would meet SMAQMD's guidance for program-level analysis.

THRESHOLDS OF SIGNIFICANCE

The issue of global climate change is inherently cumulative, and therefore, the Plan's impact on climate change is addressed only as a cumulative impact.

With respect to GHG emissions, State CEQA Guidelines Section 15064.4(a) states that lead agencies "shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate" GHG emissions resulting from a project. The State CEQA Guidelines note that an agency has the discretion to either quantify a project's GHG emissions or rely on a "qualitative analysis or performance-based standards" (Section 15064.4[a]). A lead agency may use a "model or methodology" to estimate GHG emissions and has the discretion to select the model or methodology it considers "most appropriate to enable decision makers to intelligently take into account the project's incremental contribution to climate change" (Section 15064.4[c]). The State CEQA Guidelines provide that the lead

agency should consider the following when determining the significance of impacts from GHG emissions on the environment (Section 15064.4[b]):

- The extent a project may increase or reduce GHG emissions as compared to the existing environmental setting.
- Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
- The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

As stated above, the Plan is a policy document and does not propose any specific future projects. However, some strategies and their associated actions under the Plan would result in construction and operations-related activities. At this programmatic level, it is not possible to estimate exact quantities of construction– and operations-related emissions related to the implementation of the Plan. Details necessary for estimating construction and operational emissions, such as location, scale, phasing, and exact equipment types and numbers, are not known at this type and level of analysis. Therefore, this analysis uses a qualitative approach to determine whether implementing the Climate Compass could result in GHG-related impacts based on the criteria above.

However, this qualitative analysis does discuss the City's quantified 2021 baseline GHG emissions inventory and future projections for 2030 and 2045, which were calculated as part of the Plan development. This analysis considers both a business-as-usual (BAU) scenario and a "no local action" (NLA) scenario as calculated for and presented in the Plan. The BAU scenario is an emissions forecast for the years 2030, 2035, 2040, and 2045 that indicates how community emissions would increase in the absence of laws and regulations (e.g., State standards for renewable energy and vehicle fuel efficiency) and without any additional actions by the City to reduce emissions. This scenario accounts for the population, housing, and employment growth expected for the city through the year 2045. Conversely, the NLA scenario adjusts the BAU forecast to consider the impact of existing State (e.g., SB 1020, Advanced Clean Cars I and II, and Title 24 Building Energy Standards updates) and federal laws and regulations on the city's future GHG emissions.

As shown in Table 2-8 on Chapter 2, "Project Description," of this Draft SEIR, the Climate Compass estimates that the city's community BAU emissions would reach approximately 1.3 $MMTCO_2e$ by 2030 and approximately 1.8 $MMTCO_2e$ by 2045. As shown in Table 2-10 in Chapter 2, "Project Description," of this Draft SEIR, the Plan estimates that the city's community NLA emissions would reach 966,427 $MTCO_2e$ by 2030 and 483,474 $MTCO_2e$ by 2045.

Consistent with statewide GHG targets (i.e., AB 32 and AB 1279), the city's GHG emissions with Plan implementation have been compared to the following future targets:

1. 39 percent below 2021 levels by 2030, which is equivalent to the statewide 2030 target of 48 percent below 1990 levels per the 2022 Scoping Plan scenario.
2. 85 percent below 2021 levels by 2045, which aligns with the statewide 2045 target of 85 percent below 1990 levels as codified in AB 1279 and included in the 2022 Scoping Plan.

Notably, this analysis does not include evaluation of the interim target years of 2035 and 2040 because no statewide plans or legislation in place require GHG reductions in those years. In addition, as codified in AB 1279 and included in the 2022 Scoping Plan, statewide carbon neutrality is to be achieved by 2045 or sooner. The Climate Compass's 2045 target of 85 percent below 2021 levels aligns with the statewide 2045 target, as codified in AB 1279 and the 2022 Scoping Plan. This is because the City's 2045 target of 85 percent below 2021 levels is equivalent to an 85 percent reduction below 1990 levels, which aligns with the State of California's target of 85 percent below 1990 levels. Consequently, the Climate Compass is equivalent to the State target.

For calculation details, assumptions, and tables related to the 2021 baseline GHG inventory, projections of 2030 and 2045 emissions, and strategies and actions, refer to the Climate Compass on the City's website at: https://elkgrove.gov/cap.

GHG impacts have been evaluated by assessing whether the Climate Compass conflicts with applicable GHG emissions reduction strategies and local actions approved or adopted by CARB, SMAQMD, SACOG, and others. The 2022 Scoping

Plan, SACOG's 2020 MTP/SCS, and General Plan policies and goals all apply to the Plan and all are intended to reduce GHG emissions to exceed the statewide target for 2030 set forth in SB 32 and meet the statewide target for 2045 outlined in AB 1279. Therefore, the significance of the contribution of the Climate Compass's GHG emissions has been evaluated consistently with State CEQA Guidelines Section 15064.4(b)(2) by considering whether the Plan would conflict with applicable plans, policies, and regulations adopted for the purpose of reducing GHG emissions (e.g., CARB's 2022 Scoping Plan).

State CEQA Guidelines Section 15064.4(b)(3) states that a lead agency "may consider a project's consistency with the State's long-term climate goals or strategies" when determining the significance of a project's impacts. Additionally, in *Center for Biological Diversity v. Department of Fish and Wildlife* (2015) 62 Cal.4th 204, the California Supreme Court sanctioned the use of such a threshold. The court found that assessing a project's GHG impacts based on a consistency with a GHG emission reduction plan threshold of significance is legally permissible under CEQA.

State CEQA Guidelines Section 15064 and relevant portions of Appendix G recommend that a lead agency consider a project's consistency with relevant, adopted plans and discuss any inconsistencies with applicable regional plans, including plans to reduce GHG emissions. Using the criteria of Appendix G of the State CEQA Guidelines, the Plan would result in a cumulatively considerable contribution to climate change if it would:

- generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, or
- conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

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**.

General Plan EIR and 2023 Subsequent EIR Determination

The General Plan EIR determined that while development under the General Plan would result in construction and operational GHG emissions that would contribute to climate change on a cumulative basis, the General Plan and the 2019 CAP would result in GHG emissions reductions sufficient to meet the City's GHG reduction targets. And because the targets 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, impacts were determined to be less than significant.

The 2023 Subsequent EIR determined that operation of the GPAs/VMT Standards Project would generate approximately 17,426 $MTCO_2e$/year or 2.9 $MTCO_2e$ per capita in 2040 (i.e., assumed first full year of operation). As concluded in the 2023 Subsequent EIR, although implementation of the GPAs/VMT Standards Project would result in both direct and indirect GHG emissions, the 2019 CAP and associated General Plan policies would reduce emissions consistent with local GHG emissions reduction targets that were developed in consideration of the statewide 2030 reduction target established by SB 32 and the 2017 Scoping Plan. Unmitigated GHG emissions were determined to increase as a result of the GPAs/VMT Standards Project due to the construction and operation of new development allowed by the amended land use plan. However, the 2019 CAP's 2050 GHG forecast included new emissions from regional population growth, additional households, and changes in driving behaviors, thus accounting for this increase in unmitigated emissions. Therefore, the 2019 CAP measures were developed considering the growth identified in the 2023 SEIR and adjusted accordingly to achieve the GHG reduction targets set forth by SB 32 and Executive Order S-3-05.

Nevertheless, development under the GPAs/VMT Standards Project would extend past 2030 to 2040 and beyond. While the 2019 CAP established a long-term reduction target for 2050 of 1.4 $MTCO_2e$ per capita, the measures identified in the 2019 CAP were not sufficient to meet this target. The 2023 Subsequent EIR noted this is in large part because the gap between an unmitigated BAU scenario and adjusted BAU could not be accurately depicted at the time of preparing the 2019 CAP due to the uncertainty of the nature and breadth of regulatory mechanisms that the State would enact to achieve long-term targets extending to 2050, as well as available technology and systems. For instance, the regulatory landscape during the preparation of the 2019 CAP did not encompass the targets set forth by AB 1279 (i.e., reduce anthropogenic emissions by 85 percent below 1990 levels by 2045 and maintain net negative emissions after 2045) and the 2022 Scoping Plan because it was completed prior to the adoption of both the legislation and the 2022 Scoping Plan. Therefore, the 2023 Subsequent EIR determined that the 2019 CAP did not address the State's more recent long-term GHG reduction targets.

With new long-term targets that are more aggressive than and supersede the State's previous long-term targets of reducing emissions by 80 percent below 1990 levels by 2050, the GPAs/VMT Standards Project was determined to 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.

Proposed Climate Compass Impact Analysis

The Climate Compass is a policy document that does not include any land use or zoning changes; site-specific development, designs, or proposals; nor does it grant any entitlements for development that would result in environmental impacts. Instead, the Climate Compass would commit the City to more sustainably develop projects that could already occur under the General Plan, as amended. As a policy document, the Climate Compass requires increased electrification and decarbonization of buildings and infrastructure, increased renewable energy use and storage, reduced energy and resource consumption, improved clean and efficient transportation, strengthened resilience and adaptation measures, support for the green economy, and enhanced public education and outreach around climate issues. Once adopted, implementation of the Plan's strategies and actions could require construction and/or operational activities, which could have the potential to directly or indirectly emit GHG emissions.

Construction

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

Construction efforts anticipated to support these activities would generally be small in scale, utilize hand tools and small machinery with limited use of heavy-duty construction equipment, and require minimal numbers of construction workers and associated worker vehicle trips. To provide a point of reference for the scale of construction activities that would occur under the Plan, project-level construction emissions under the Plan would not be expected to result in GHG emissions in excess of SMAQMD's project-level GHG emissions thresholds (i.e., 1,100 $MTCO_2e$/year) on an individual basis.

Furthermore, implementation of the Climate Compass would reduce GHG emissions generated during construction activities, including those associated with implementing the actions it contains. Action FEC-2.2 encourages the development of a policy to require greater use of low- and zero-emission off-road vehicles and encourages electric equipment (e.g., landscaping, construction) for City-owned equipment, City-funded projects, and City contractors. Additionally, Strategy TR-3 would reduce off-road transportation emissions through Action TR-3.1, which would require all construction projects starting in 2025 and later to use renewable diesel in diesel-powered construction equipment, and Action TR-3.2, which would prohibit the use of fossil-fuel-powered generators at construction sites in all discretionary projects. Action WW-2.4 promotes the adoption of a policy that would require minimum recycled content in construction materials for all municipal construction and maintenance projects, which would reduce GHG emissions associated with producing new construction materials.

Moreover, all potential emissions sources and activity types associated with implementing the Plan are consistent with those previously evaluated in the General Plan EIR and the 2023 Subsequent EIR. Any additional emissions from the construction of projects to facilitate the strategies and actions of the Climate Compass would be inherently short-term, negligible, and offset by the emissions reductions realized from the operational GHG benefits of the Climate Compass. Therefore, GHG emissions generated from construction activities implementing the Climate Compass would be minimal.

Operations

The Climate Compass includes strategies and actions that could generate operational GHG emissions when implemented. Occasional operation and maintenance activities, such as maintenance vehicle use, equipment and facilities repair and replacement, tree watering and trimming, landscaping and vegetation management, and irrigation and water usage inspections, would be required in response to implementation of some actions included within the Climate Compass (e.g., Actions RA-5.2, RA-5.3, RA-6.1, RS-1.6, WW-1.1, and WW-1.2). These operation and maintenance activities would occur on an intermittent schedule where activities are minimal and anticipated to be accomplished with existing City personnel in conjunction with existing maintenance activities. While these types of maintenance and operation activities would generate GHG emissions, the increase in these emissions would be minimal, and overall operational GHG emissions would not substantially increase.

However, implementation of Strategy RC-1, "Increase Organic Waste Diversion" and Strategy WW-2, "Practice Sustainable Waste Management" and subsequent actions (Actions RC-1.1 through RC-1.3 and WW-2.2) could indirectly generate operational GHG emissions. Action WW-2.2 would increase recycling and organic waste diversion at all municipal buildings, while Strategy RC-1 and its associated actions would increase organic waste diversion in the community. As a result, the Climate Compass may indirectly result in expanded local capacity for composting and

processing of organic waste, which could, in turn, result in additional truck hauling trips to support the increased local composting capacity. However, the additional truck trips would be diverted from landfills within the county and would not necessarily constitute new truck trips. If an increase in truck trips were to occur from the implementation of Actions WW-2.2 and Strategy RC-1, the emissions associated with such trips would be offset by the emissions reductions achieved through the avoidance of fugitive methane emissions, a more potent GHG as compared to CO_2, from the decomposition of organic matter at landfills.

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

The Plan's transportation-related strategies and actions would reduce mobile-source emissions in the community by encouraging the reduction of VMT per capita and increased EV usage to reduce the consumption of fossil fuels. Implementation of Strategy TR-1, "Decrease Vehicle Miles Traveled," Strategy TR-2, "Increase Zero-Emission Vehicle (ZEV) Adoption," Strategy TR-3, "Reduce Off-Road Transportation Emissions," and subsequent actions (Actions TR-1.1 through TR-1.8, TR-2.1 through TR-2.5, TR-3.1 and TR-3.3) would reduce community-generated transportation GHG emissions by reducing VMT, encouraging ZEVs and EVs, incentivizing electrification of equipment, and increasing public awareness around public and alternative transportation programs and services.

Municipal transportation-related GHG emissions would be reduced through the implementation of Strategy FEC-1, "Reduce COEG Employee Commute VMT," and Strategy FEC-2, "Shift to Clean On-Road and Off-Road Vehicles and Equipment," and subsequent actions (Actions FEC-1.1 through FEC-1.8 and FEC-2.1 through 2.2). These strategies and actions would result in shifting to clean on- and off-road municipal vehicles and equipment, launching an annual VMT reduction challenge for City employees, developing a local Transportation Management Agency to reduce VMT; establishing an e-bike lending library for City employees to use as an alternative to vehicle use; partnering with the Sacramento Regional Transit District to establish a program offering monthly public transit passes to City employees; and establishing a ride home program that would provide rides for City employees in the form of vouchers for rideshare or taxi services up to a certain number of times per year.

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

Strategies and actions to reduce energy-related GHG emissions would also be implemented for municipal operations. For example, implementation of Action BF-1.1 would involve adopting a policy that requires all new City buildings to be all-electric starting in 2026 and would require existing buildings purchased by the City to be fully electrified within 5 years of purchase. Action BF-2.1 would ensure that electricity used for City buildings, facilities, streetlights, and traffic lights is sourced from renewable sources to the maximum extent possible. Action BF-3.1 would develop and adopt a green building policy requiring all new City buildings to meet or exceed CALGreen Tier 1 certification standards, establishing requirements for energy-efficient design, renewable energy integration, water conservation, and sustainable materials use. By increasing the use of electricity and decreasing the use of natural gas combustion, the Climate Compass would reduce GHG emissions by reducing the combustion of fossil fuels used for building utilities.

Therefore, while operation and maintenance activities associated with implementing the Climate Compass could generate GHG emissions, emissions would be relatively minimal and compensated for by the long-term GHG emission reductions from the Plan itself.

Summary

The Climate Compass would comply with current regulatory standards, including those adopted after the General Plan EIR was certified (i.e., AB 1279), establishing more stringent reduction targets than those evaluated in the General Plan EIR and the 2023 Subsequent EIR. The overall net benefit of the Climate Compass related to permanent reductions in GHG emissions throughout the Planning Area would be far greater than any short-term, minor construction- and operation-related GHG emissions. Furthermore, as the Climate Compass does not include any land use or zoning changes to the current General Plan land use plan, adoption of the Plan would not change the level of development contemplated under the General Plan, as amended by the GPAs/VMT Standards Project, and as evaluated in the 2023 Subsequent EIR. Instead, the Climate Compass would promote more sustainable development that could already occur under the General Plan, as amended by the GPAs/VMT Standards Project. As such, the Climate Compass would not be growth-inducing or generate GHG emissions greater than identified for the General Plan, as amended by the GPAs/VMT Standards Project.

As discussed above and in greater detail in Chapter 2, "Project Description," the Climate Compass includes: 1) BAU scenario to demonstrate how emissions would change over time without federal, State, or local action; and 2) NLA scenarios to demonstrate how GHG emissions would change over time, accounting for legislative actions at the federal and State levels (i.e., without local actions). Comparison of these two scenarios demonstrate the effectiveness of the State and federal legislative actions at reducing GHG emissions and provides local jurisdictions with the ability to identify if additional GHG emissions reductions are needed to achieve local GHG emission reduction targets. If additional GHG emissions reductions are needed, local jurisdictions develop local actions to address reducing these additional GHG emissions (i.e., a CAP).

The Climate Compass establishes separate GHG emissions reduction goals for community and municipal operations sources. To achieve the City's 2030 and 2045 community GHG emission reduction targets, community GHG emissions would need to be reduced by 327,615 $MTCO_2e$ in 2030 and be reduced by 322,498 $MTCO_2e$ in 2045 (refer to Table 2-13, "Elk Grove Community GHG Emission Gap ($MTCO_2e$)" in Chapter 2, "Project Description"). The Climate Compass quantified GHG emission reductions from the community strategies and actions to determine whether these actions would be sufficient to meet the City's 2030 and 2045 reduction goals (refer to Table 2-15, "Community GHG Emissions Reduction Strategies," in Chapter 2, "Project Description"). Total reductions from the implementation of the Climate Compass community GHG emission reduction strategies and actions would be 385,968 $MTCO_2e$ in 2030 and 356,645 $MTCO_2e$ in 2045. Therefore, the total estimated reductions from the community GHG emissions reduction strategies and actions would be sufficient to meet the City's 2030 and 2045 targets.

Regarding the City's 2030 and 2045 municipal operations GHG emissions reduction targets, GHG emissions from municipal operations would need to be reduced by 1,923 $MTCO_2e$ in 2030 and be reduced by 2,070 $MTCO_2e$ in 2045 (refer to Table 2-17, "Elk Grove Municipal Operations GHG Emission Gap Analysis ($MTCO_2e$)" in Chapter 2, "Project Description"). The Climate Compass quantified GHG emission reductions from the municipal strategies and actions to determine whether these actions would be sufficient to meet the City's 2030 and 2045 reduction goals. Total reductions from implementation of the Climate Compass municipal operations GHG emission reduction strategies and actions would be 2,501 $MTCO_2e$ in 2030 and 2,450 $MTCO_2e$ in 2045. Therefore, the total estimated reductions from the municipal operations GHG emissions reduction strategies and actions would be sufficient to meet the City's 2030 and 2045 targets.

Notably, the emissions reductions quantified by the Climate Compass would occur alongside the enactment of other environmental regulations that would achieve GHG emissions reductions independent of the Climate Compass; this is accounted for in the NLA scenarios also modeled in the Climate Compass. As citywide emissions trend down through 2045 in the NLA scenario, implementation of the Climate Compass would serve to further reduce GHG emissions. Therefore, emissions reductions achieved by the Climate Compass in 2045 would be less than the emissions reductions achieved in 2030 because the City could achieve fewer GHG emissions beyond those otherwise required through legislation.

As demonstrated above, 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, as directed by AB 1279. Adoption of the Climate Compass would replace the 2019 CAP, which is not consistent with current statewide GHG emissions reduction targets and would provide the City the roadmap 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 of 2030. Overall, GHG emissions would be substantially reduced in 2030 and 2045 compared to the NLA scenario (i.e., implementation of the General Plan without implementation of the strategies and actions included in the Climate Compass). Since the Climate Compass would be sufficient in meeting statewide GHG reduction targets, 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**.

Mitigation Measures

No mitigation is required.

Impact 3.2-2: 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 $MTCO_2e$ per capita by 2050 consistent with 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**.

General Plan EIR and 2023 Subsequent EIR Determination

The General Plan EIR determined that while development under the General Plan would result in construction and operational GHG emissions that would contribute to climate change on a cumulative basis, the General Plan and the 2019 CAP would result in GHG emissions reductions sufficient to meet the City's GHG reduction targets. And because the targets 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, impacts were determined to be less than significant.

The 2023 Subsequent EIR determined that operation of the GPAs/VMT Standards Project would generate approximately 17,426 $MTCO_2e$/year or 2.9 $MTCO_2e$ per capita in 2040 (i.e., assumed first full year of operation). As concluded in the

2023 Subsequent EIR, although implementation of the GPAs/VMT Standards Project would result in both direct and indirect GHG emissions, the 2019 CAP and associated General Plan policies would reduce emissions consistent with local GHG emissions reduction targets that were developed in consideration of the statewide 2030 reduction target established by SB 32 and the 2017 Scoping Plan. Unmitigated GHG emissions were determined to increase as a result of the GPAs/VMT Standards Project due to the construction and operation of new development allowed by the amended land use plan. However, the 2019 CAP's 2050 GHG forecast included new emissions from regional population growth, additional households, and changes in driving behaviors, thus accounting for this increase in unmitigated emissions. Therefore, the 2019 CAP measures were developed in consideration of the growth identified in the 2023 SEIR and adjusted accordingly to achieve the GHG reduction targets set forth by SB 32 and Executive Order S-3-05.

Nevertheless, development under the GPAs/VMT Standards Project would extend past 2030 to 2040 and beyond. While the 2019 CAP established a long-term reduction target for 2050 of 1.4 $MTCO_2e$ per capita, the measures identified in the 2019 CAP were not sufficient to meet this target. The 2023 Subsequent EIR noted this is in large part because the gap between an unmitigated BAU scenario and adjusted BAU could not be accurately depicted at the time of preparing the 2019 CAP due to the uncertainty of the nature and breadth of regulatory mechanisms that the State would enact to achieve long-term targets extending to 2050, as well as available technology and systems. For instance, the regulatory landscape during the preparation of the 2019 CAP did not encompass the targets set forth by AB 1279 (i.e., reduce anthropogenic emissions by 85 percent below 1990 levels by 2045 and maintain net negative emissions after 2045) and the 2022 Scoping Plan because it was completed prior to the adoption of both the legislation and the 2022 Scoping Plan. Therefore, the 2023 Subsequent EIR determined that the 2019 CAP did not address the State's more recent long-term GHG reduction targets.

With new long-term targets that are more aggressive than and supersede the State's previous long-term targets of reducing emissions by 80 percent below 1990 levels by 2050, the GPAs/VMT Standards Project was determined to 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.

Proposed Climate Compass Impact Analysis

Sacramento Area Council of Governments Metropolitan Transportation Plan/Sustainable Communities Strategy

In 2019, SACOG adopted an update to its MTP/SCS that establishes policies and implementation actions for GHG emissions reductions in the on-road transportation sector, consistent with statewide targets set by CARB pursuant to SB 375. The Climate Compass strategies and actions have been developed to be consistent with policy priorities discussed in Chapter 2, "Policies and Implementation," of the 2020 MTP/SCS. These actions include those that would result in new facilities such as new EV charging stations (Actions FEC-2.1, TR-2.1, and TR-2.4) and additional minor bicycle and pedestrian infrastructure (Action TR-1.1), as well as actions that would reduce single-occupancy vehicle trips by encouraging alternative transportation such as public transit, biking, and walking (Actions FEC-1.6, TR-1.3, FEC-1.8, and FEC-1.3). Therefore, the Climate Compass would be aligned with the targets set by CARB and SACOG for GHG emissions reduction goals and includes Climate Compass actions consistent with SACOG policy priorities. As such, implementation of the Climate Compass would not conflict with the regional MTP/SCS.

California Green Building Standards Code

The Climate Compass would be consistent with the requirements of the CALGreen Code, which include building energy and water efficiency improvements. The Climate Compass includes strategies and actions that would implement both new and existing building energy efficiency improvements, decarbonize new and existing buildings, and improve energy efficiency and water efficiency. For example, Action BE-1.5 recommends adoption of voluntary CALGreen measures that encourage heat pump installations when air conditioners are replaced in existing single-unit residential,

while Action TR-2.1 recommends adoption of a reach code for EV charging to meet CALGreen Tier 1 requirements, require new commercial development to equip parking spaces with EV charging receptacles. Action BF-3.1 proposes developing and adopting a green building policy requiring all new municipal buildings to meet or exceed CALGreen Tier 1 standards, establishing requirements for energy-efficient design, renewable energy integration, water conservation, and sustainable materials use. Through the implementation of these strategies and actions, the Plan would be consistent with the mandatory requirements of the CALGreen Code.

Federal, State, and Regional Regulations, Plans, and Standards

The Climate Compass supports other State and regional regulations, plans, and standards that aim to further reduce GHG emissions. Action BF-2.2, which encourages the installation of on-site renewable energy systems, would also support regulations regarding the increased use of renewables for electricity production (i.e., SB 100 and SB 1020). The Plan's actions that would reduce VMT and require EV infrastructure (e.g., Actions TR-2.1, TR-2.4, FEC-1.3, FEC-1.6, FEC-1.4, and FEC-2.1) would also support legislation and regulations regarding carbon neutrality goals (AB 1279, Advanced Clean Cars II, and EO N-79-20). Other actions (WW-2.2 and RC-1.1) would increase the diversion of organic waste from both City and community land uses and subsequently result in increased composting to support solid waste reduction. These would support State regulations regarding reduction of organic waste disposal (i.e., SB 1383 and the Short-Lived Climate Pollutant Reduction Strategy).

Regarding energy efficiency and electrification, the Climate Compass would include actions such as BF-1.1, which would adopt a policy that requires all new municipal buildings to be all-electric starting in 2026 and would require existing buildings purchased by the City to be fully electrified within 5 years of purchase. Action BE-1.2 would develop a comprehensive building energy retrofit plan to transition existing residential and nonresidential buildings to all-electric. Lastly, Action BF-2.2 would prioritize solar and battery storage system installations on suitable municipal buildings and facilities based on solar potential, historic energy consumption, roof condition, available site area, and potential cost savings. By increasing the use of electricity, especially that which is sourced from renewables, and decreasing the use of natural gas combustion, the Climate Compass would reduce countywide GHG emissions by reducing the combustion of fossil fuels used for building utilities.

Actions that support the increased utilization and generation of renewable energy would also support the renewable energy goals of SMUD's 2030 Zero Carbon Plan, which aims to achieve the zero-carbon goal through 100 percent renewable generation by 2030.

2022 Scoping Plan, SB 32, and AB 1279

The Climate Compass's GHG emissions reduction targets are consistent with the statewide GHG targets codified in SB 32 and AB 1279 and utilized in the 2022 Scoping Plan. Because 1990 GHG emissions data are not available for the City, the Climate Compass's GHG emissions reduction targets were developed relative to the 2021 GHG emissions inventory and established in proportion with statewide reduction for all emissions sectors relevant to the City's jurisdiction, consistent with CARB guidance (refer to Section 2.4.1, "GHG Emissions Inventory"). The Climate Compass's 2030 target of 39 percent below 2021 levels exceeds the statewide 2030 target as codified in SB 32. Notably, while not codified legislatively, the 2022 Scoping Plan includes a statewide revised target for 2030 of a 48 percent reduction from a 1990 statewide inventory compared to SB 32's 40 percent goal. Consequently, the Climate Compass is more stringent than the legislatively mandated State target compared to both 1990 and per-capita emissions levels. The Climate Compass's 2030 target is derived using the 2022 Scoping Plan's recommendation that local land use developments contribute their "fair share" of emissions reductions to the statewide GHG target for 2030. This is consistent with the recommendation made in the California Association of Environmental Professionals' 2016 white paper for "Substantial Progress" thresholds for land use development to show consistency with statewide targets (AEP 2016).

The Climate Compass's 2045 target sets the City on a trend to achieve its fair share of California's 2045 carbon neutrality target. Therefore, pursuant to State CEQA Guidelines Section 15064.4(b)(3), the Climate Compass's 2045 target represents the level below which GHG emissions would not be cumulatively considerable through 2045. Finally, the Climate Compass's 2045 aspirational goal of carbon neutrality aligns with the statewide 2045 carbon neutrality target stipulated in AB 1279. As discussed above in Impact GHG-1, the City is forecast to achieve these targets. Consistency

with the 2022 Scoping Plan and the State's legislative GHG emissions reduction targets is an appropriate metric to determine the significance of the Climate Compass's GHG emissions.

Appendix D of the 2022 Scoping Plan identifies three key priority areas for GHG reductions by local governments: VMT Reduction, Transportation Electrification, and Building Decarbonization. As explained below, the Climate Compass's strategies and actions are consistent with the reduction strategy recommendations in CARB's 2022 Scoping Plan.

The VMT Reduction priority area aims to reduce fossil fuel consumption and GHG emissions from the transportation sector by promoting land use planning principles and project design features that can reduce VMT. As discussed above, the Climate Compass includes numerous actions that would collectively reduce VMT, such as Actions TR-1.2, TR-1.4, FEC-1.2, FEC-1.6, and FEC-1.8. These actions involve increasing public transit and rideshare ridership, implementing VMT-reduction incentive programs for COEG employees, and improving active transportation (e.g., biking, walking) infrastructure (TR-1.1). Additionally, the Climate Compass does not propose land uses, such as offices, residences, or industrial, that would increase employment or population in the region and would not induce growth-related VMT to the region. Therefore, the Plan would be consistent with the VMT Reduction priority strategy identified by the 2022 Scoping Plan.

The Transportation Electrification priority area aims to reduce fossil fuel consumption and GHG emissions from the transportation sector by increasing EV use. Appendix D of the 2022 Scoping Plan includes strategies for achieving success in this priority area, which are: conversion of local government fleets to ZEVs and providing EV charging at public sites, and the development of an ecosystem for ZEVs that incorporates the implementation of additional refueling infrastructure to support the transition to ZEVs. As discussed above, the Climate Compass includes actions such as Actions FEC-2.1, TR-2.1, and TR-2.4, which would collectively increase the implementation and use of EV infrastructure in the community and for municipal operations. Implementation of these actions would involve requiring new publicly accessible fueling stations to install one direct current fast charger for each two fuel dispenser positions, adopting a reach code for EV charging to meet CALGreen Tier 1 requirements to require new commercial development to equip parking spaces with EV charging stations, and implementing the *Infrastructure Plan for Fleet Electrification* to transition the City's vehicle fleet to ZEVs (mostly EVs). Additionally, these actions would result in the continued scaling up and ongoing maintenance for the infrastructure required to support an all-electric City fleet, including deploying EV charging stations at appropriate locations. Therefore, the Climate Compass would be consistent with the Transportation Electrification priority area identified by the 2022 Scoping Plan.

Regarding the Building Decarbonization priority area, the Climate Compass includes actions such as BF-1.1, BF-2.1, and BE-1.2. These actions would involve adopting a policy that requires all new municipal buildings to be all-electric starting in 2026 (while also requiring that existing buildings purchased by the City to be fully electrified within 5 years of purchase), ensuring that electricity used at municipal buildings and facilities, along with electricity used for streetlights and traffic lights, is sourced from renewable sources to the maximum extent possible, and developing a comprehensive building energy retrofit plan to transition existing residential and nonresidential buildings to all-electric. These actions would reduce overall GHG emissions for the generation and consumption of energy during the operation of buildings within the city and would be consistent with this priority area identified in the 2022 Scoping Plan.

Summary

As demonstrated above, the Climate Compass would achieve the City's overall goal to reduce GHG emissions in alignment with statewide GHG reduction goals established in the 2022 Scoping Plan as directed 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 to reduce 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. Therefore, implementation of the Climate Compass would result in a less severe impact than what was identified in the General Plan EIR and the 2023 Subsequent EIR and impacts would be reduced to **less than significant**.

Mitigation Measures

No mitigation is required.

4 CUMULATIVE IMPACTS

4.1 INTRODUCTION TO THE CUMULATIVE ANALYSIS

This Draft SEIR provides an analysis of cumulative impacts of the proposed Plan, as required by Section 15130 of the California Environmental Quality Act (CEQA) Guidelines. The goal of such an exercise is twofold: first, to determine whether the overall long-term impacts of all such projects would be cumulatively significant; and second, to determine whether the incremental contribution to any such cumulatively significant impacts by the Plan would be "cumulatively considerable" (and thus significant). (See State CEQA Guidelines Sections 15130[a]–[b], Section 15355[b], Section 15064[h], and Section 15065[c]; and *Communities for a Better Environment v. California Resources Agency* [2002] 103 Cal. App. 4th 98, 120.) In other words, the required analysis intends first to create a broad context in which to assess cumulative impacts, viewed on a geographic scale beyond the Plan area itself, and then to determine whether the Plan's incremental contribution to any significant cumulative impacts from all projects is itself significant (i.e., "cumulatively considerable").

Cumulative impacts are defined in State CEQA Guidelines Section 15355 as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." A cumulative impact occurs from "the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects." Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time" (State CEQA Guidelines Section 15355[b]).

4.2 CUMULATIVE IMPACT ANALYSIS METHODOLOGY

Consistent with State CEQA Guidelines Section 15130, the discussion of cumulative impacts in this Draft SEIR focuses on significant and potentially significant cumulative impacts. Section 15130(b) of the State CEQA Guidelines provides, in part, the following:

> [t]he discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact.

A proposed project is considered to have a significant cumulative effect if:

- the cumulative effects of development without the project are not significant and the project's additional impact is substantial enough, when added to the cumulative effects, to result in a significant impact; or
- the cumulative effects of development without the project are already significant and the project contributes measurably to the effect.

The term "measurably" is subject to interpretation. The standards used herein to determine measurability are that the impact must be noticeable to a reasonable person, or must exceed an established threshold of significance (defined throughout the resource sections in Chapter 3 of this Draft SEIR).

The State CEQA Guidelines (Section 15130) identify two basic methods for establishing the cumulative environment in which the project is to be considered: the use of a list of past, present, and probable future projects, or the use of adopted projections from a general plan, other regional planning document, or a certified EIR for such a planning document. This analysis uses the planning document approach, as described further below.

The cumulative impact analysis provided in this chapter evaluates whether the Plan could result in potentially new cumulatively considerable impacts or an increase in the severity of previously identified cumulative impacts that were

identified in the General Plan EIR and the Subsequent EIR to the General Plan EIR (2023 Subsequent EIR) for the General Plan Amendments and Update of Vehicle Miles Traveled (VMT) Standards Project (GPAs/VMT Standards Project) pursuant to State CEQA Guidelines Section 15162(b).

4.3 CUMULATIVE SETTING

On February 27, 2019, the City adopted the 2019 General Plan Update (General Plan) and the 2019 CAP Update (2019 CAP) and certified the General Plan Update Environmental Impact Report (General Plan EIR) (SCH No. 2017062058), which programmatically evaluated both documents separately. 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 judgment, bears relation to its planning efforts (referred to as study areas).The General Plan EIR evaluated the buildout scenario of the General Plan, which was estimated based on the land uses within the city limits and the four study areas (i.e., the Planning Area). Assuming future annexation and development of the four study areas, buildout of the Planning Area under the General Plan would result in a maximum of 102,865 dwelling units, 332,254 residents, and 122,155 jobs.

Since its adoption in 2019, the General Plan and the General Plan EIR have been amended seven times, three times with Supplemental /Subsequent EIRs for the Housing and Safety Element Update, the Southeast Industrial Area Specific Plan, and most recently, the GPAs/VMT Standards Project. In January 2021, the General Plan Land Use Diagram was amended as part of the adoption of the Southeast Industrial Area Specific Plan associated with annexation. The Southeast Industrial Area includes 561 acres south of Grant Line Road and east of the Union Pacific Railroad tracks and State Route 99 within the City's sphere of influence. The Southeast Industrial Area was designated as Public Open Space/Recreation in the General Plan, which was amended to a designation of Light Industrial uses, resulting in a reduction of recreation and mixed General Commercial and Office uses. The SEIR prepared for the Southeast Industrial Area Specific Plan considered impacts associated with annexation and buildout of the Southeast Industrial Area.

In May 2021, the adoption of the 2021 Housing Element Update amended the General Plan Land Use Diagram to allow for an additional 2,745 dwelling units and an increase in population of 8,773 persons above what was assumed in the General Plan and evaluated in the General Plan EIR.

On December 13, 2023, the City adopted the GPAs/VMT Standards Project and certified the 2023 Subsequent EIR (SCH No. 2022020463). The GPAs/VMT Standards Project included amendments to the General Plan for the creation of the Livable Employment Area Community Plan Area; to update the City's VMT thresholds, including associated changes to the Transportation Analysis Guidelines; revisions to the South and West Study Areas in the General Plan; incorporation of the Grant Line Road Precise Plan as part of the Rural Area Community Plan; for other land use changes; and amendments to the adopted General Plan Mitigation Measures MM 5.5.1a and MM 5.5.1b associated with cultural resource impacts. Under the GPAs/VMT Standards Project, buildout of the Planning Area under the General Plan would result in a maximum of 104,716 dwelling units, 338,233 residents, and 123,923 jobs.

4.4 ANALYSIS OF CUMULATIVE IMPACTS

The General Plan represents the cumulative development scenario for the reasonably foreseeable future in the City as it establishes the policy framework for growth and development of the City and supporting public service and infrastructure improvements. Therefore, since the Climate Compass has been developed based on the buildout assumptions of the General Plan as amended by the GPAs/VMT Standards Project, the analysis presented in this Draft SEIR generally represents a cumulative analysis of Elk Grove as a whole over the General Plan planning horizon as described above in Section 4.3, "Cumulative Setting."

As indicated above, CEQA requires that an EIR include an assessment of the cumulative impacts that could be associated with project implementation. This assessment involves examining project-related effects on the environment in the context of similar effects that have been caused by past or existing projects, as well as the anticipated effects of future projects. An EIR must discuss the cumulative impacts of a project when its incremental effect will be cumulatively considerable. Although project-related impacts may be individually minor, the cumulative effects of these impacts, in

combination with the impacts of other projects, could be significant under CEQA and must be addressed (CEQA Guidelines, Section 15130[a]). Section 15130(a)(3) states that an EIR may determine that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable, and thus not significant, if a project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact. Section 15130(b) indicates that the level of detail of the cumulative analysis need not be as great as for the project impact analyses; that it should reflect the severity of the impacts and their likelihood of occurrence; and that it should be focused, practical, and reasonable.

The following sections contain a discussion of the cumulative effects anticipated from implementation of the Climate Compass, together with related projects and planned development, for each of the environmental issue areas evaluated in this Draft SEIR. The analysis herein analyzes whether the residual impacts of the Plan would cause a cumulatively significant impact or would contribute considerably to an existing or anticipated (without the Plan) cumulatively significant effects that were identified in General Plan EIR, as amended by the 2023 Subsequent EIR. Where the Plan would contribute to a cumulatively significant impact, additional mitigation is recommended where necessary and/or feasible.

4.4.1 Energy

The geographic area considered for cumulative impacts related to energy use includes the Sacramento Municipal Utility District (SMUD) and Pacific Gas and Electric Company (PG&E) service areas. SMUD and PG&E employ various programs and mechanisms to support the provision of electricity and natural gas services to new development and recoup new infrastructure costs. Connection fees are typically charged through standard billing for services.

Planned and approved projects would receive electricity service from SMUD and natural gas service from PG&E. These projects would consume energy related to transportation (i.e., gasoline and diesel consumption for passenger vehicles, trucks, buses, and other vehicles) and construction. These projects would be required to implement energy efficiency measures in accordance with the current building code (e.g., Title 24 standards or better) to reduce energy demand from buildings and would likely implement transportation demand management considerations to reduce vehicle trips and miles traveled, which would reduce fuel consumption. Moreover, cumulative projects located within the Planning Area would be required to comply with the policies and actions of the General Plan, as amended, and 2019 CAP (or the adopted CAP at the time of project approval) as they relate to energy efficiency. Therefore, implementation of development would not result in a significant cumulative energy impact related to the wasteful or inefficient use of energy.

GENERAL PLAN EIR AND 2023 SUBSEQUENT EIR DETERMINATION

The General Plan EIR determined that construction-related energy expenditures would be less than significant due to the inherent short-term nature of construction. The General Plan EIR also determined that operational energy usage would be less than significant because future development would comply with applicable future versions of the California Energy Code and due to the implementation of the policies and actions of the General Plan and the 2019 CAP that would reduce energy consumption. Therefore, the General Plan EIR less than cumulatively considerable energy impacts from buildout of the General Plan.

The 2023 Subsequent EIR determined implementation of the GPAs/VMT Standards Project would be subject to the energy efficiency actions of the current building code (e.g., Title 24 standards or better) and the 2019 CAP and would not result in a substantial increase in energy use or wasteful energy use beyond what was evaluated in the General Plan EIR. In addition, the 2023 Subsequent EIR determined the more densely operated land uses proposed under the GPAs/VMT Standards Project would improve the energy efficiency of the City's residences on a per capita basis as compared to the less dense land uses included under the General Plan. Therefore, the 2023 Subsequent EIR determined the GPAs/VMT Standards Project would not result in a new or greater contribution of cumulative effects to energy use beyond what was identified in the General Plan EIR. As such, the 2023 Subsequent EIR concluded the GPAs/VMT Standards Project's contribution to the less than significant cumulative impact would remain less than cumulatively considerable as identified in the General Plan EIR.

PROPOSED CLIMATE COMPASS CUMULATIVE ANALYSIS

Impact 4-1: Cumulative Impacts Related to Energy

As discussed in greater detail in Section 3.1, "Energy," of this 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 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.

4.4.2 Greenhouse Gas Emissions and Climate Change

Climate change is a global phenomenon. No single project alone would measurably contribute to an incremental change in the global average temperature or to global or local climates or microclimates. From the standpoint of CEQA, GHG impacts relative to global climate change are inherently cumulative.

GENERAL PLAN EIR AND 2023 SUBSEQUENT EIR DETERMINATION

The General Plan EIR determined that while development that would occur under the General Plan would result in construction- and operational-related GHG emissions that contribute to climate change, the General Plan and 2019 CAP would result in GHG emissions reductions sufficient in meeting the GHG reduction targets and goals that were developed to be consistent and aligned with the goals identified in the 2017 Scoping Plan to meet the statewide GHG emission reduction targets for 2020 and 2030, as established by AB 32 and SB 32. Therefore, the General Plan EIR determined that impacts related to generating GHG emissions until target year 2030 would be less than significant.

However, 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 per capita by 2050 consistent with 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. Therefore, the General Plan EIR concluded impacts related to meeting the long-term GHG reduction goal for 2050 would be significant and unavoidable.

The 2023 Subsequent EIR determined that with new long-term targets that are more aggressive than and supersede the State's previous long-term targets of reducing emissions by 80 percent below 1990 levels by 2050, 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 efficiency of the 2019 CAP measures would be more speculative. Therefore, with the change in the regulatory landscape the 2023 Subsequent EIR concluded that the GPAs/VMT Standards Project would result in a greater contribution to cumulative effects related to GHG emissions and climate change beyond what was identified in the General Plan EIR. Therefore, the GPAs/VMT Standards Project's contribution to the significant cumulative impact would be cumulatively considerable and significant and unavoidable.

PROPOSED CLIMATE COMPASS CUMULATIVE ANALYSIS

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

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

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**.

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5 ALTERNATIVES

5.1 INTRODUCTION

The California Code of Regulations (CCR) Section 15126.6(a) (State CEQA Guidelines) requires EIRs to describe "… a range of reasonable alternatives to the project, or to the location of the 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. An EIR need not consider every conceivable alternative to a project. Rather, it must consider a range of potentially feasible alternatives that will avoid or substantially lessen the significant adverse impacts of a project, and foster informed decision making and public participation. An EIR is not required to consider alternatives that are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason." This section of the State CEQA Guidelines also provides guidance regarding what the alternatives analysis should consider. Subsection (b) further states the purpose of the alternatives analysis is as follows:

> Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code [PRC] Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

The State CEQA Guidelines require that the EIR include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative must be discussed, but in less detail than the significant effects of the project as proposed (CCR Section 15126.6[d]).

The State CEQA Guidelines further require that the "no project" alternative be considered (CCR Section 15126.6[e]). The purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving a proposed project with the impacts of not approving the proposed project. If the no project alternative is the environmentally superior alternative, CEQA requires that the EIR "…shall also identify an environmentally superior alternative among the other alternatives." (CCR Section 15126[e][2]).

In defining "feasibility" (e.g., "… feasibly attain most of the basic objectives of the project …"), CCR Section 15126.6(f) (1) states, in part:

> Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives.

In determining what alternatives should be considered in the EIR, it is important to consider the objectives of the project, the project's significant effects, and unique project considerations. These factors are crucial to the development of alternatives that meet the criteria specified in Section 15126.6(a). Although, as noted above, EIRs must contain a discussion of "potentially feasible" alternatives, the ultimate determination as to whether an alternative is feasible or infeasible is made by the lead agency's decision-making body, here the City of Elk Grove. (See PRC Sections 21081.5, 21081[a] [3].)

5.2 CONSIDERATIONS FOR SELECTION OF ALTERNATIVES

5.2.1 Attainment of Project Objectives

The primary objectives of the Climate Compass are to:

- Develop an updated CAP to align the City's climate action planning with California's greenhouse gas (GHG) emissions 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 climate action plan 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 VMT efficiency and reduce GHG emissions by creating walkable communities with amenities that attract and retain businesses and residents.

5.2.2 Environmental Impacts of the Climate Compass Project

Sections 3.1 through 3.2 of this Draft SEIR address the environmental impacts of implementation of the proposed Climate Compass Project. Potentially feasible alternatives were developed with consideration of avoiding or lessening the significant, and potentially significant, adverse impacts of the project, as identified in Chapter 3 of this Draft SEIR and summarized below. If an environmental issue area analyzed in this Draft SEIR is not addressed below, it is because no significant impacts were identified for that issue area. No significant and unavoidable environmental impacts or potentially significant impacts that could be reduced to less-than-significant levels with mitigation resulting from the project were identified.

5.3 ALTERNATIVES CONSIDERED BUT NOT EVALUATED FURTHER

As described above, State CEQA Guidelines Section 15126.6(c) provides that the range of potential alternatives for the project shall include those that could feasibly accomplish most of the basic objectives of the project, and could avoid or substantially lessen one or more of the significant effects. Alternatives that fail to meet the fundamental project purpose need not be addressed in detail in an EIR. (*In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings* (2008) 43 Cal.4th 1143, 1165-1167.)

In determining what alternatives should be considered in the EIR, it is important to acknowledge the objectives of the project, the project's significant effects, and unique project considerations. These factors are crucial to the development of alternatives that meet the criteria specified in Section 15126.6(a). Although, as noted above, EIRs must contain a discussion of "potentially feasible" alternatives, the ultimate determination as to whether an alternative is feasible or infeasible is made by lead agency decision-maker(s). (See Pub. Resources Code, § 21081(a)(3).) At the time of action on the project, the decision-maker(s) may consider evidence beyond that found in this EIR in addressing such

determinations. The decision-maker(s), for example, may conclude that a particular alternative is infeasible (i.e., undesirable) from a policy standpoint, and may reject an alternative on that basis provided that the decision-maker(s) adopts a finding, supported by substantial evidence, to that effect, and provided that such a finding reflects a reasonable balancing of the relevant economic, environmental, social, and other considerations supported by substantial evidence. (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 401, 417; *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 998.)

The EIR should also identify any alternatives that were considered by the lead agency but were rejected during the planning or scoping process and briefly explain the reasons underlying the lead agency's determination.

The following alternatives were considered by the City but are not evaluated further in this Draft SEIR.

5.3.1 Land Use Intensification Alternative

This alternative would consist of implementation of the Climate Compass as proposed as well as adopting amendments to the City's General Plan land use designations to increase residential densities and provide additional opportunities for mixed-use development that promote a pattern of development that further reduces VMT and resultant GHG emissions. As described in Chapter 2, "Project Description," the City adopted the General Plan Amendments and Update of Vehicle Miles Traveled (VMT) Standards Project (GPAs/VMT Standards Project) in 2023 that increased residential densities and mixed-use opportunities associated with the creation of the Livable Employment Area Community Plan (LEA Community Plan). The intent of the LEA Community Plan is to connect transportation with land-use planning and design in recognition that the most economically, socially, and environmentally successful communities are walkable and contain a mix of uses. This land use change was directed in 2019 by the Elk Grove City Council to leverage the value of a planned new thoroughfare, Kammerer Road, beyond its ability to carry vehicle traffic, to lay the foundation for economic development in the form of a 21st century employment center. 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 (City of Elk Grove 2023:Table 3.9-3) as well as reduced per capita GHG emissions in 2040 (2.9 $MTCO_2e$ per year) as compared to what is identified in the 2019 CAP for 2050 (3.0 $MTCO_2e$ per year) (City of Elk Grove 2023:3.5-4 and 3.5-11). Thus, land use intensification efforts to improve VMT and reduce GHG emissions have already been enacted by the City and are the foundational land use plan used for the Climate Compass. As such, consideration of this alternative has been eliminated from further analysis.

5.3.2 Alternative Locations

State CEQA Guidelines Section 15126.6(f)(2) states that the "key question and first step" in analysis of alternatives is whether any significant impacts would be avoided or substantially lessened by moving the project to an alternative location.

The Climate Compass 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 and regional 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, and Sacramento Municipal Utility District's (SMUD's) 2030 Zero Carbon Plan at the regional level. Because the Climate Compass is intended to address City GHG emissions, an alternative site where the Project could be implemented would not be feasible or appropriate. The City only has jurisdiction over lands within its legal boundaries. As such, consideration of an alternative location has been eliminated from further analysis.

5.3.3 Carbon Offset Alternative

Under this alternative, a carbon offset mitigation program that provides objective standards to determine which carbon offset programs qualify as producing sufficiently real, permanent, quantifiable, verifiable, enforceable, and additional reductions in GHG emissions and includes quantifiable measurements such as compliance with the offset protocols approved by CARB or a qualified registry could be considered on a project-specific basis for City operations, capital improvement projects, and private development.

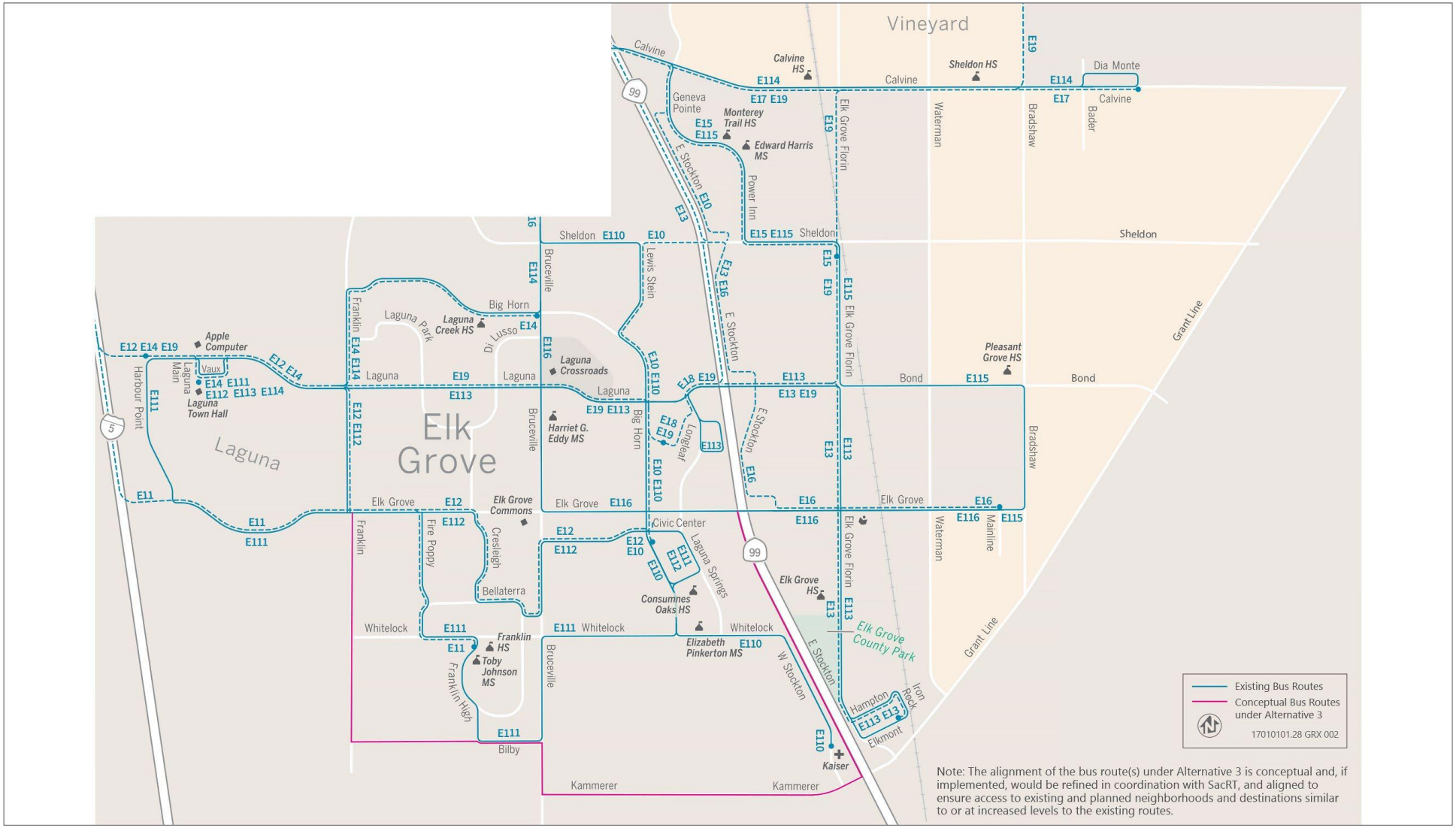
The Climate Compass aligns with State and regional laws, policies, regulations, and plans to reduce GHG emissions and improve resilience to climate change-related impacts without the use of carbon offsets; therefore, incorporating the purchase of carbon offset credits to reduce GHG emissions is not required to meet the project objectives. As such, consideration of this alternative has been eliminated from further analysis.

5.4 ALTERNATIVES SELECTED FOR DETAILED ANALYSIS

The three alternatives listed below present a reasonable range of alternatives to the Climate Compass. The analysis in this section focuses on significant impacts attributable to each alternative and the ability of each alternative to meet basic project objectives. The three alternatives evaluated in this Draft SEIR are as follows:

- **Alternative 1: 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 No Local Action (NLA) scenario from the Climate Compass.
- **Alternative 2: Removal of Reach Code Actions Alternative** assumes the Climate Compass would be adopted with the exclusion of Actions BE-1.1 and TR-2.1, both of which require the City to adopt reach codes by 2026, from the Community GHG Emissions Reduction Strategies and associated actions list. Under this alternative, all strategies and associated actions included for City operations under the Climate Compass would remain the same. Specifically, Actions BE-1.1 and TR-2.1 require the City to adopt reach codes encouraging transition from natural gas powered heating and appliances to electric alternatives for new construction and major renovations in both residential and nonresidential development and for electric vehicle (EV) charging, respectively. The adoption of reach codes are voluntary and must be proven to be cost effective and approved by the California Energy Commission (CEC).
- **Alternative 3: Transit Expansion Alternative** 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 addition, the headways of the existing bus routes that run within city limits would be shorten 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.

Further details on these alternatives, and an evaluation of environmental effects relative to the proposed Plan are provided below.



Source: Sacramento Regional Transit 2021; adapted by Ascent in 2025.

Figure 5-1 Alternative 3 – Transit Expansion Alternative

5.4.1 Alternative 1: No Project

Alternative 1, the No Project Alternative, assumes the Climate Compass would not be adopted and implemented and the City's future 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, as well as by federal and State legislative actions. Under this alternative, the City would not adopt updated local 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.

As discussed in Chapter 2, "Project Description," of this Draft SEIR, the NLA scenario accounts for population and employment growth within the Planning Area as well as the legislative actions at the federal and State levels, such as regulatory requirements to increase vehicle fuel efficiency (refer to Table 2-9 in Chapter 2, "Project Description," for the full list of legislative reductions used in the NLA scenario). As shown in Table 5-1, based on NLA scenario modeling, the City's community GHG emissions are anticipated to decline from 2021 levels through 2045, with GHG emissions decreasing by 7 percent from 2021 levels by 2030 and by 53 percent from 2021 levels by 2045.

Table 5-1 Elk Grove Community GHG Emissions Inventory and NLA Forecast ($MTCO_2e$)

Sector	2021	2030	2045
On-Road Transportation	586,220	449,118	166,840
Residential Building Energy	271,900	299,782	178,777
Nonresidential Building Energy	126,465	152,746	55,643
Solid Waste	20,222	26,034	36,165
Off-Road Vehicles and Equipment	18,341	25,296	36,158
Agriculture	10,275	3,869	575
Wastewater Treatment	2,957	6,707	9,317
Water Supply	2,802	2,875	0
Total	**1,039,181**	**966,427**	**483,475**
Percent Change from 2021 Levels		-7%	-53%

Notes: Total may not sum exactly due to independent rounding. BAU = business-as-usual; GHG = greenhouse gas; $MTCO_2e$ = metric tons of carbon dioxide equivalent; NLA = No Local Action.

Source: City of Elk Grove 2025.

As shown in Table 5-2, based on NLA scenario modeling, the City's operational GHG emissions are anticipated to increase by 6 percent from 2021 levels by 2030 but would decrease by 36 percent from 2021 levels by 2045.

Table 5-2 Elk Grove City Operations GHG Emissions Inventory and NLA Forecasts (Annual $MTCO_2e$)

Sector	2021	2030	2045
Buildings and Facilities	1,741	2,054	1,588
Streetlights and Traffic Signals	893	907	0
Employee Commute	835	769	201
Vehicle Fleet	620	578	646
Solid Waste	139	184	239
Water Supply	9	9	0
Wastewater Treatment	7	7	3
Process and Fugitive	32	42	55
Total	**4,275**	**4,550**	**2,732**
Percent Change from 2021 Levels	—	*+6%*	*-36%*

Notes: Total may not sum exactly due to independent rounding. GHG = greenhouse gas; NLA = No Local Action; $MTCO_2e$ = metric tons of carbon dioxide equivalent;.

Source: City of Elk Grove 2025.

ENERGY

As discussed in Section 3.1, "Energy," the Climate Compass would result in less-than-significant environmental impacts related to wasteful, inefficient, or unnecessary consumption of energy and would not conflict with or obstruct plans for renewable energy or energy efficiency. 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 Alternative 1 the benefits of the Climate Compass 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, which would include updated strategies and associated actions related to more stringent building code requirements which in turn improve energy efficiency, community and City operations 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.

As discussed in Section 3.1, "Energy," of the Draft SEIR, SMUD is required to procure increasing levels of carbon-free energy sources, driven by the requirements of SB 100 and SB 1020. Collectively, SB 100 and SB 1020 require utility providers to supply 90 percent of electricity from eligible renewable energy resources and zero-carbon resources by December 31, 2035; 95 percent by December 31, 2040; and 100 percent by December 31, 2045. SMUD's 2022 Integrated Resource Plan demonstrates that SMUD is capable of meeting these requirements. Additionally, SMUD adopted its 2030 Zero Carbon Plan, which is the roadmap for SMUD to achieve a 100 percent carbon-free electricity supply by 2030, 15 years in advance of the SB 100 requirements. The Climate Compass complements the goals of these legislative actions by helping to achieve SMUD's 2030 Zero Carbon Plan through increasing building and vehicle electrification and installing renewable energy sources. The transition to carbon-free electricity as the main source of energy provides public health benefits through improved air quality by reducing fossil fuel combustion in the city.

While residential and nonresidential 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 Climate Compass, Alternative 1 would not provide the same level of long-term reduction in fossil fuel energy consumption and use of carbon-free energy sources as this alternative does not include the proposed Plan's strategies and actions that require the electrification and decarbonization of buildings and facilities, additional EV infrastructure, and energy efficiency and water conservation. In addition, Alternative 1 would also not provide the same level of public health or energy efficiency benefits to the City as the Climate Compass. Therefore, Alternative 1 would have a **greater** impact on energy consumption than the Climate Compass but would still result in less-than-significant environmental impacts related to wasteful, inefficient, or unnecessary consumption of energy and would not conflict with or obstruct plans for renewable energy or energy efficiency.

GREENHOUSE GAS EMISSIONS

As discussed in Section 3.2, "Greenhouse Gas Emissions and Climate Change," the Climate Compass would result in less-than-significant environmental impacts related to GHGs and climate change. As shown above, under the NLA scenario, the City's community GHG emissions are anticipated to decline from 2021 levels through 2045, with GHG emissions decreasing by 7 percent from 2021 levels by 2030 and by 53 percent from 2021 levels by 2045 (Table 5-1). The City's operational GHG emissions are anticipated to increase by 6 percent from 2021 levels by 2030 but would decrease by 36 percent from 2021 levels by 2045 (Table 5-2). Accounting for applicable federal and State legislative actions, GHG emissions from City operations are expected to slightly increase by 2030 from 2021 levels with the city's anticipated population growth and then decline by 2045 with the benefits of legislative actions outpacing the city's growth. Although Alternative 1 would not develop a new CAP that would be consistent with statewide GHG reduction goals as identified in the 2022 Scoping Plan, as directed by AB 1279, this alternative would continue to reduce GHG emissions, although to a much lesser degree than the Climate Compass, within the City throughout the foreseeable future as demonstrated in Tables 5-1 and 5-2. 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 project, 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.

5.4.2 Alternative 2: Removal of Reach Code Actions Alternative

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

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

Table 5-3 Alternative 2 Community GHG Emissions Reduction Strategies

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

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

Strategy Number	Strategy Name	GHG Reductions ($MTCO_2e$) 2030	GHG Reductions ($MTCO_2e$) 2045
Resource Consumption (RC)			
RC-1	Increase Organic Waste Diversion	4,755	28,775
RC-2	Promote a Circular Economy	Included in RC-1	Included in RC-1
RC-3	Reduce Water Use	140	0
	Resource Consumption Subtotal	**4,895**	**28,775**
Green Economy (GE)			
GE-1	Support Green Businesses	N/A	N/A
	Green Economy Subtotal	**N/A**	**N/A**
Climate Action Commitment (CA)			
CA-1	Conduct Meaningful Community Outreach	N/A	N/A
CA-2	Provide Community Education on Public Health and Wellbeing	N/A	N/A
CA-3	Provide Community Education on Water Efficiency	N/A	N/A
CA-4	Measure and Manage Climate Action Progress	N/A	N/A
	Climate Action Commitment Subtotal	**N/A**	**N/A**
	Total Reductions from Strategies	**335,558**	**356,645**
	Reduction Needed to Meet Target	*327,615*	*322,498*
	Target Met?	Yes	Yes
	Remaining Gap to Target	-7,943	-34,148

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

Source: City of Elk Grove 2025.

ENERGY

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

GREENHOUSE GAS EMISSIONS

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

5.4.3 Alternative 3: Transit Expansion Alternative

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 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 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.

ENERGY

As discussed in Section 3.1, "Energy," the Climate Compass would result in less-than-significant environmental impacts related to wasteful, inefficient, or unnecessary consumption of energy and would not conflict with or obstruct plans for renewable energy or energy efficiency. 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 Climate Compass, from an impact perspective, to differentiate from the benefits of the proposed Plan. Therefore, this alternative would result in **similar** impacts to energy as the Climate Compass.

GREENHOUSE GAS EMISSIONS

As discussed in Section 3.2, "Greenhouse Gas Emissions and Climate Change," the Climate Compass would result in less-than-significant environmental impacts related to GHGs and climate change. Because Alternative 3 was not modeled as part of the Climate Compass and did not include separate VMT modeling to quantify the potential GHG emissions reductions that could be provided by this alternative, this alternative has been evaluated qualitatively. Increasing the number of bus routes under this alternative 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 Climate Compass. Therefore, this alternative would result in **similar** impacts to GHGs and climate change as the Climate Compass.

5.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

As illustrated in Table 5-4, below, Alternative 3, Transit Expansion Alternative, would be the environmentally superior alternative because this alternative would be similar to the Climate Compass but would include an additional action to expand the transit system to improve connectivity between the local and regional transit and bus systems. Although the environmental impacts would be similar to the proposed project, 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.

Table 5-4 Summary of Environmental Effects of the Alternatives Relative to the Proposed Climate Compass

Environmental Topic	Proposed Project	Alternative 1: No Project Alternative	Alternative 2: Removal of Reach Code Actions Alternative	Alternative 3: Transit Expansion Alternative
Energy	LTS	Greater	Greater	Similar
Greenhouse Gas Emissions	LTS	Greater	Greater	Similar

6 OTHER CEQA-MANDATED SECTIONS

6.1 GROWTH INDUCEMENT

Section 21100(b)(5) of the State California Environmental Quality Act (CEQA) Guidelines specifies that the growth-inducing impacts of a project must be addressed in an EIR. Section 15126.2(e) of the State CEQA Guidelines provides the following guidance for assessing growth-inducing impacts of a project:

> Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a wastewater treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also, discuss the characteristics of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

A project can induce growth directly, indirectly, or both. Direct growth inducement would result if a project involved construction of new housing. Indirect growth inducement would result, for instance, if implementing a project resulted in any of the following:

- substantial new permanent employment opportunities (e.g., commercial, industrial, or governmental enterprises) that would encourage development of new housing for employees;
- substantial short-term employment opportunities (e.g., construction employment) that indirectly stimulates the need for additional housing and services to support the new temporary employment demand; and/or
- removal of an obstacle to additional growth and development, such as removing a constraint on a required public utility or service (e.g., construction of a major sewer line with excess capacity through an undeveloped area). Infrastructure projects could also indirectly stimulate growth by enhancing access to properties or increasing their desirability for development.

Growth inducement itself is not an environmental effect but may foreseeably lead to environmental effects. If substantial growth inducement occurs, it can result in secondary environmental effects, such as increased demand for housing, demand for other community and public services and infrastructure capacity, increased traffic and noise, degradation of air or water quality, degradation or loss of plant or animal habitats, conversion of agricultural and open-space land to urban uses, and other effects.

6.1.1 Growth-Inducing Impacts of the Climate Compass

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 of Elk Grove's (City's) judgment, bears relation to its planning efforts (referred to as study areas). As discussed in the City's General Plan Update Environmental Impact Report (General Plan EIR) (SCH No. 2017062058), approximately 45,397 new housing units could be accommodated under the General Plan land use plan within the Planning Area under buildout conditions. Under buildout conditions, the City's population would be estimated to grow by approximately 155,282 residents to a total of 332,254 residents. While the General Plan EIR recognized that future urban development outside of the City limits may be appropriate to accommodate future growth and identified Study Areas as possible annexation areas for the City to accommodate such growth, these areas were not included within the environmental analysis of the General Plan EIR.

To evaluate the environmental impacts of the most recent amendment to the General Plan for the General Plan Amendments and Update of Vehicle Miles Traveled (VMT) Standards Project (GPAs/VMT Standards Project), a subsequent EIR to the General Plan EIR (2023 Subsequent EIR) (SCH No. 2022020463) was prepared. As discussed in the 2023 Subsequent EIR, the GPAs/VMT Standards Project amended the City's land use plan and map, which included the identified Study Areas discussed in the General Plan EIR, to accommodate approximately 1,851 new housing units and approximately 5,979 residents within the Planning Area. The 2023 Subsequent EIR determined that while implementation of the GPAs/VMT Standards Project would facilitate development beyond Sacramento Area Council of Governments' (SACOG's) population and housing projections for 2040, the GPAs/VMT Standards Project did not assume full buildout conditions would occur by 2040 because full buildout is unlikely as it would require that every lot in Elk Grove be developed to its maximum potential. Additionally, because SACOG would update their population projections to reflect new forecasts for each city in the region during their next planning update, this update would account for the amendment to the City's General Plan and would align regional and local forecasts. Furthermore, future development under the GPAs/VMT Standards Project would be dispersed throughout the Planning Area to specific growth areas and would not change the boundaries of the Planning Area. Therefore, the 2023 Subsequent EIR determined there would be no new significant growth and growth impacts would not be more severe than those identified in the General Plan EIR.

POPULATION GROWTH

The Climate Compass is a planning document that does not include any land use or zoning changes; site-specific development, designs, or proposals; nor does it grant any entitlements for development that would result in environmental impacts. Rather, the Climate Compass would promote more sustainable development that could already occur under the General Plan, as amended. As a planning document, the Climate Compass would generally encourage electrification and decarbonization of buildings and infrastructure, increase renewable energy use and storage, reduce energy and resource consumption, improve clean and efficient transportation, strengthen resilience and adaptation measures, support green economy, and enhance public education and outreach around climate issues.

The Plan is not by itself directly growth inducing because it does not increase densities or modify intensities of allowable land uses and does not directly include site-specific projects that would induce population growth. No changes to the current General Plan land use designations are proposed under the Climate Compass. The Climate Compass establishes the framework for the City to achieve its GHG emission reduction targets and includes strategies and actions to adapt to anticipated climate-related impacts. Adoption and implementation of the Plan would not facilitate development of residential uses within the city and as such would not directly generate population growth.

While implementation of some of the strategies and actions contained in the Plan may result in future improvements to alternative modes of transportation, such as new bicycle lanes or pedestrian paths or improved alternative transportation routes and programs, the Plan would not facilitate the development of new roadways that could create or increase wholesale access to any areas within the city. Rather, these future improvements would reduce GHG emissions by improving multimodal transportation options throughout the city to increase connectivity and reduce VMT. Therefore, adoption and implementation of the Climate Compass would not indirectly generate population growth by constructing new infrastructure that would provide access to new, developable areas of the city.

Strategies and actions that commit the City to work with partners to promote and support on-site renewable energy generation and storage are intended to increase renewable energy generation and use in the city. The Plan encourages more sustainable, energy efficient development within the city, where development would be able to use renewable energy to power on-site facilities or improve the City's ability to use renewable energy for municipal operations. However, the Plan does not propose to replace existing utility services with large-scale renewable energy projects, which could indirectly induce population growth.

As explained further in Chapter 2, "Project Description," the Climate Compass has been prepared consistent with the tiering and streamlining provisions of State CEQA Guidelines Section 15183.5, which allows for streamlining future project-specific GHG emissions analyses where projects considered by the City are within the buildout assumptions included in a GHG reduction plan and can demonstrate consistency with the CAP measures and actions. As a secondary

process to the Climate Compass once adopted, the City would develop the Climate Compass Consistency Review Checklist to provide a process and evidence by which subsequent development projects would demonstrate consistency with the Plan. If subsequent projects are found to be consistent with the Climate Compass (and within the growth projections assumed therein), then the environmental documents prepared for these projects can rely upon and incorporate by reference the cumulative GHG analysis for the Climate Compass, as presented in this Draft SEIR. However, if a project is not consistent with the General Plan, as amended, or its land use designations, then it would not be eligible for streamlining and require project-specific analysis and environmental review.

The streamlining provision may reduce the need for subsequent development projects that are within the scope of projected growth to undertake project-specific analysis of GHG emissions and identify mitigation measures. However, establishing a program for addressing cumulative emissions from the community would not facilitate growth or indirectly remove obstacles to growth. Therefore, to the extent that future projects streamline GHG analyses through demonstrated consistency with the Climate Compass, would not result in indirect inducement of growth beyond the scope of the General Plan EIR, as amended by the 2023 Subsequent EIR.

ECONOMIC GROWTH

Implementation of the Climate Compass would likely result in some capital improvements and may result in incentivization of energy efficiency and renewable energy improvements, expansion of alternatively fueled vehicles, water conservation improvements, and expansion of waste diversion services. These actions could result in a small number of new jobs, specifically related to construction and maintenance services, but are not expected to result in a substantial increase in the demand for additional housing or public services. These jobs would likely be filled by the existing labor pool within the city, and are, therefore, not expected to be growth inducing.

6.2 SIGNIFICANT AND UNAVOIDABLE ADVERSE IMPACTS

Section 15126.2(b) of the State CEQA Guidelines requires EIRs to include a discussion of the significant environmental effects that cannot be avoided if a project is implemented. As demonstrated within Chapter 3, "Environmental Setting, Impacts, And Mitigation Measures," and Chapter 4, "Cumulative Impacts," of this Draft SEIR, adoption and implementation of the Climate Compass would not result in any significant and unavoidable impacts. Furthermore, implementation of the Climate Compass would result in less severe impacts than those disclosed in the General Plan EIR, as amended by the 2023 Subsequent EIR.

6.3 SIGNIFICANT AND IRREVERSIBLE ENVIRONMENTAL CHANGES

State CEQA Guidelines Section 15126.2(c) requires that an EIR evaluate the commitment of nonrenewable resources that would be considered irreversible by future generations. An example of this type of commitment may include the construction of a roadway that would provide access to previously inaccessible environmental lands. Irretrievable commitments of resources should be evaluated to ensure that such current consumption is justified. In addition, Section 15126.2(b) of the State CEQA Guidelines indicates that potentially significant energy implications of a project shall be considered in an EIR to the extent relevant and applicable to the project. This Draft SEIR considers the use of energy in Section 3.1, "Energy," which should be referred to for a comprehensive evaluation of energy use related to the Climate Compass.

As previously described, the Climate Compass identifies the strategies and actions that would need to be undertaken to reduce GHG emissions consistent with State legislative requirements and local targets and goals and would not result in growth-inducing impacts. As described in Section 2.2, "Project Objectives," in Chapter 2, "Project Description," the primary focus of the Plan is to comprehensively update the City's current CAP to align with California's GHG reduction goals and relevant regulations aimed at climate mitigation. The Plan generally encourages electrification and decarbonization of buildings and infrastructure, increases renewable energy use and storage, reduces energy and resource consumption, improves clean and efficient transportation, strengthens resilience and adaptation measures, supports a green economy, and enhances public education and outreach around climate issues. Some of the actions

may indirectly result in the construction of some improvements that would require the use of fuel and building materials during construction; however, the result of the improvements would be a long-term reduction in energy consumption and a reduction in the use of nonrenewable energy sources. Continued operation and maintenance of some of the facilities may require the use of additional fuel and water consumption; however, such use would be insignificant compared to the overall reduction in use of these resources that would result from implementation of the Climate Compass. Therefore, no significant irreversible environmental changes would occur.

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