Appendix A

No Recording Fees Needed per Government Code §6103

Development Services – Planning
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NOTICE OF PREPARATION
Summer Villas Special Planning Area
Draft Environmental Impact Report

Date: ***September 9, 2024***

To: Public Agencies and Interested Parties

From: City of Elk Grove

Subject: Notice of Preparation of a Draft Environmental Impact Report for the Summer Villas Special Planning Area

The City of Elk Grove is recirculating the Notice of Preparation (NOP) to reflect revised descriptions to the surrounding uses and to extend the comment period to October 9, 2024. All comments previously submitted to the City during the initial NOP public comment period (August 9 to September 9, 2024) have been retained and any previously submitted comments do not need to be resubmitted.

The City of Elk Grove (City) will prepare a Draft Environmental Impact Report (EIR), compliant with the California Environmental Quality Act (CEQA), for the Summer Villas Special Planning Area ("Project"). Because the City has determined that an EIR will be prepared for the Project, an Initial Study will not be prepared (CEQA Guidelines Section 15063[a]). In accordance with Section 15082 of the CEQA Guidelines, this Notice of Preparation (NOP) provides a project description, location, and the probable environmental effects of construction and implementation of the Project. The NOP is circulated for a public review and comment period that begins on ***September 9*, 2024, and ends on *October 9,* 2024.**

The City is soliciting comments regarding the scope and content of the EIR as they relate to other agencies' statutory responsibilities in connection with the Project, as well as comments from interested members of the public. The City will rely on responsible and trustee agencies to provide information relevant to the analysis of resources falling within the jurisdiction of such agencies. Specifically, input is required on:

1. **Scope of Environmental Analysis** – guidance on the scope of analysis for this EIR, including identification of specific issues that will require closer study due to the location, scale, and character of the Project;
2. **Mitigation Measures** – ideas for feasible mitigation, including mitigation that would avoid, offset, eliminate, or reduce potentially significant or significant impacts; and
3. **Alternatives** – suggestions for alternatives to the Project that could reduce or avoid potentially significant or significant impacts.

The City welcomes input during the review and comment period. If the City has not received a response (or a well-justified request for additional time) from a responsible or trustee agency by the end of the review period, the City may presume that the responsible or trustee agency has no response (CEQA Guidelines Section 15082[b][2]).

Please provide any written comments that you would like the City to consider, along with the name of the appropriate contact person in your agency and their contact information, to the address shown below by **5:00 PM on October 9, 2024.**

City of Elk Grove Development Services Department
Planning Division
c/o Kyra Killingsworth
8401 Laguna Palms Way
Elk Grove, CA 95758
Email: kkillingsworth@elkgrovecity.org

SCOPING MEETING

CEQA provides for a lead agency to facilitate a scoping meeting(s), which provide additional opportunity for informing the scope and content of an EIR. The City will host a second scoping meeting on ***Monday, September 23,* 2024,** at ***6:00 P.M***. at City of Elk Grove Council Chambers, 8400 Laguna Palms Way, Elk Grove, CA 95758. Information related to the Project, including how to access project documents and how to participate in the public review process, will be provided at the scoping meeting.

PROJECT LOCATION AND SETTING

The City of Elk Grove is located within Sacramento County and is generally bounded by Interstate 5 (I-5) to the west, Calvine Road and the City of Sacramento to the north, Grant Line Road to the east, and Kammerer Road to the south. State Route (SR) 99 runs north–south through the City center, and provides regional access to the City. The project site ("site") is located at 9350 Sheldon Road, southeast of the intersection of Sheldon Road and Waterman Road, in the northeastern portion of the City (see Figure 1, Figure 2, and Figure 3). The approximately 116-acre site is identified by Assessor's Parcel Number (APN) 127-0010-077.

The site is currently developed with a rural residence and barn in the northwest corner of the site. The remainder of the site consists of grassland vegetation, which is used for grazing. In addition, Laguna Creek tributaries generally run from the northern boundary of the site to the southern boundary of the site.

The site is located within the City's Rural Area Community Plan. Both the Rural Area Community Plan and the City of Elk Grove General Plan designate the site as Rural Residential (RR). The site is zoned Agricultural Residential-Two Acre Minimum (AR-2).

SURROUNDING LAND USES

Surrounding existing uses include rural residences to the north, across Sheldon Road; undeveloped land and rural residences to the east and southeast; rural residences to the west, across Waterman Road; and a non-profit horse

rescue organization and estate residences to the south. In addition, the Elliot Springs Subdivision is currently under construction to the southwest and a school on the southeast.

Figure 1
Regional Site Location

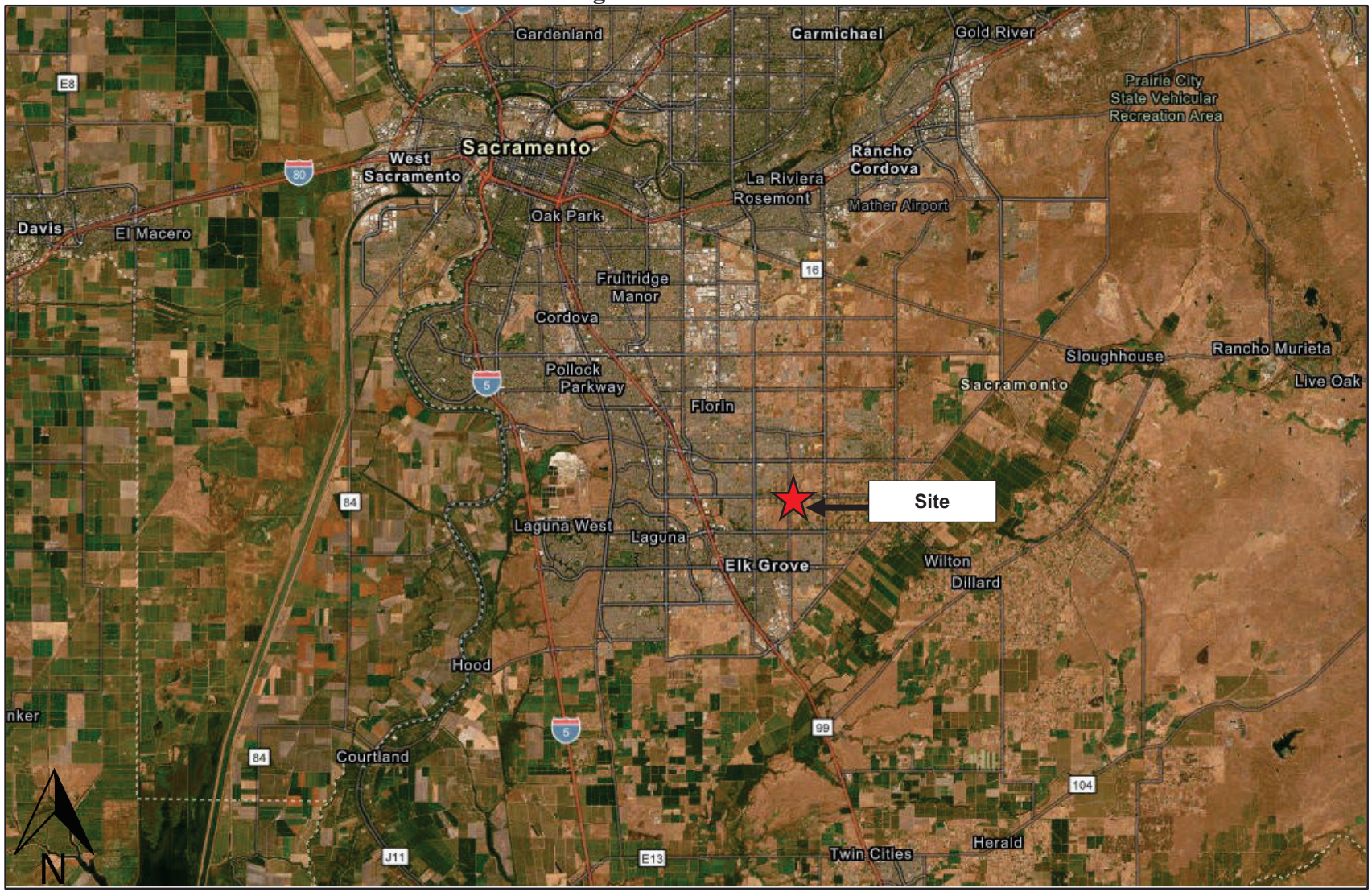

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Figure 2
Site Location/Rural Community Plan

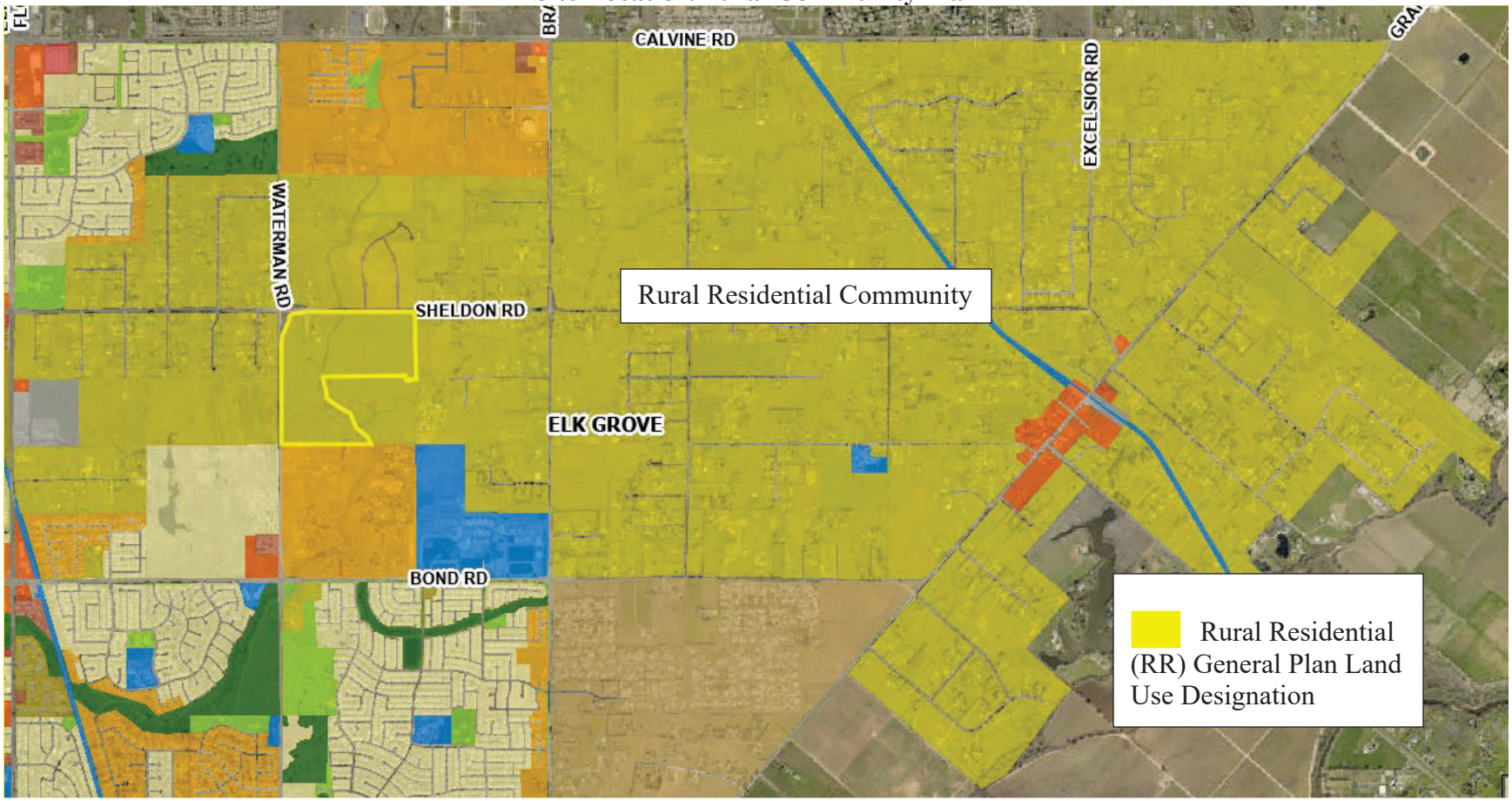

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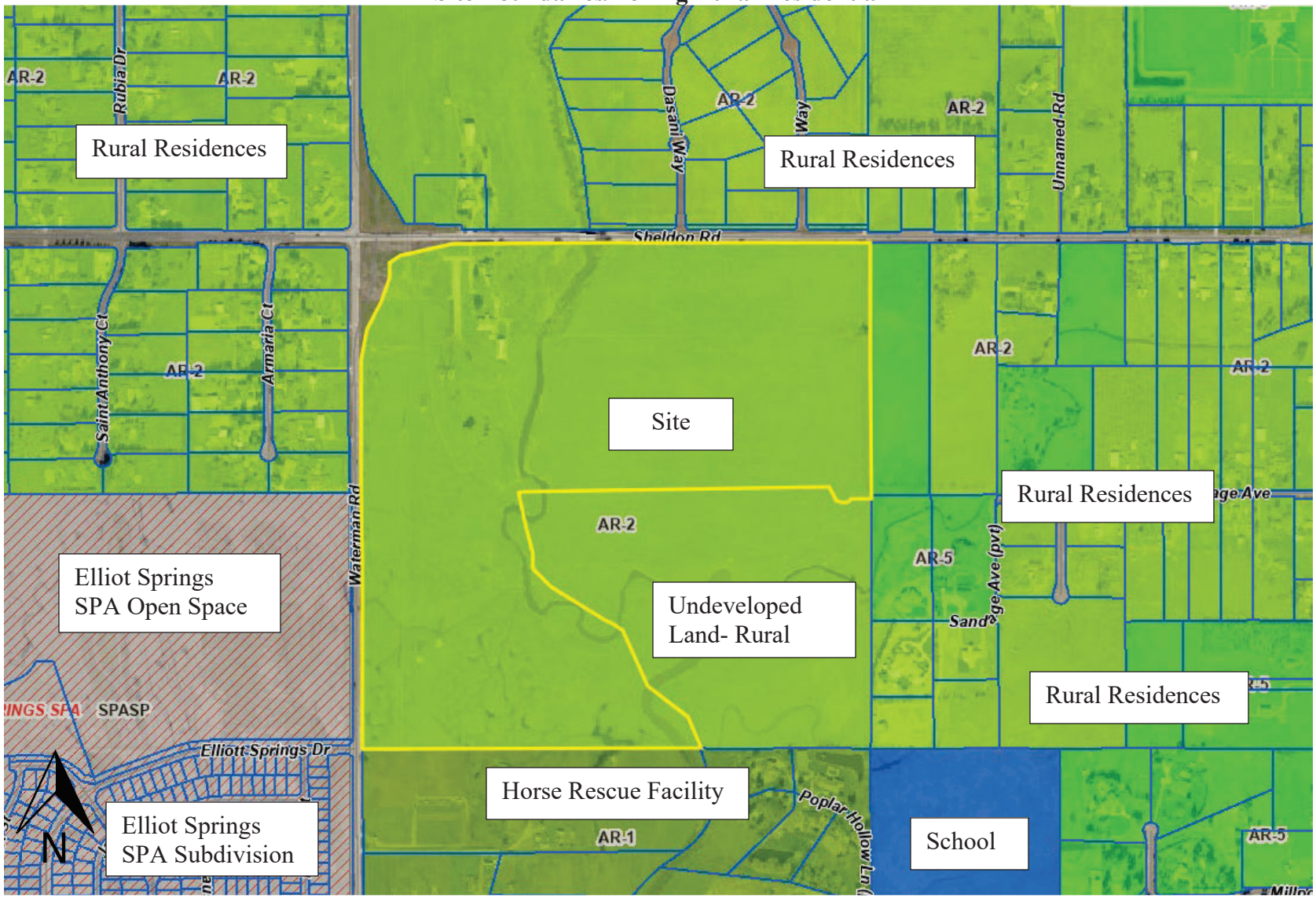
Figure 3
Site Boundaries/Zoning Rural Residential



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PROJECT DESCRIPTION

PROJECT COMPONENTS

The Project would require approval of a General Plan/Rural Area Community Plan Amendment and a Rezone to allow for the creation of the 116-acre Summer Villas Special Planning Area (SPA). The Summer Villas SPA contains three distinct sub-zones: 1) Active Adult Neighborhood (71.3 acres), 2) Laguna Creek Open Space (20.3 acres), and 3) Waterman Recreational Open Space (19.4 acres). It should be noted that the remaining five acres of the site would be dedicated to the Waterman Road and Sheldon Road right-of-way (ROW). However, the SPA would not entitle any specific development proposals, but would adopt site-specific zoning, development standards, and criteria for future development proposals within the site.

While development is not proposed at this time, CEQA requires that the project description for an environmental document include later phases or activities of a project that will foreseeably result from project approval (Section 15126). In *Laurel Heights Improvement Ass'n v Regents of Univ. of Cal.* (1988) 47 C3d 376, the court determined that environmental review under CEQA must include analysis of the environmental effects of future actions if 1) it is a reasonably foreseeable consequence of the initial project, and 2) the future action will be significant in that it will likely change the scope or nature of the initial project or its environmental effects.

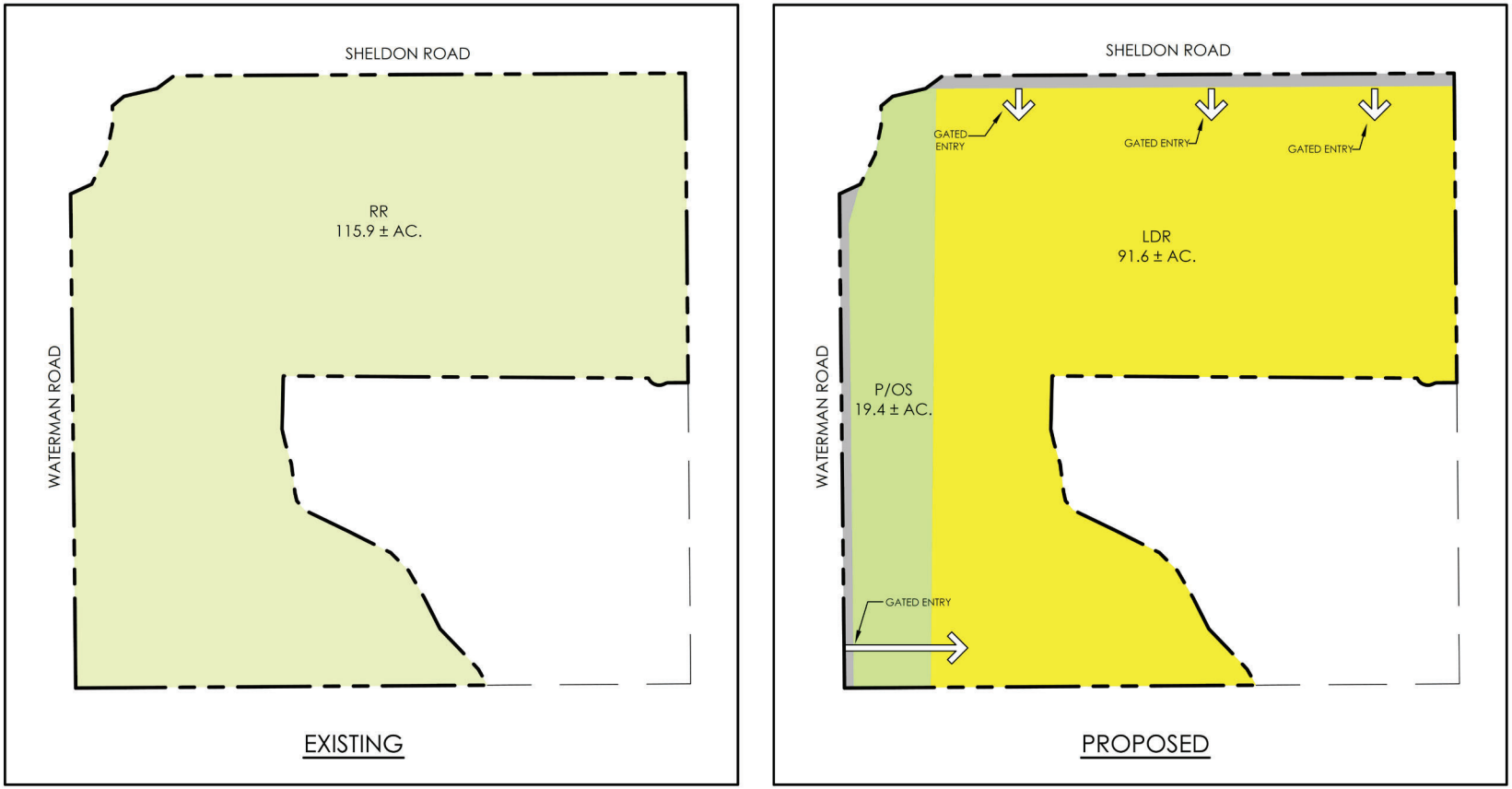
Given the sub-zones included in the SPA, a reasonable assumption can be made that on-site development of an active adult residential community would occur if the SPA is approved by the City. As such, this EIR will evaluate the impacts associated with approval of the General Plan Amendment, Rezone, and Summer Villas SPA, as well as subsequent potential development of the 116-acre site with a maximum of 499 age-restricted (55+) single-family homes, as well as various associated improvements, such as a private community recreation center/clubhouse, private park space, trails and open space areas, landscaping, and a number of on- and off-site roadway and utility improvements.

The Project components, including the required approvals, are described in further detail below.

General Plan/Rural Community Plan Amendment

The Project would require a General Plan/Rural Community Plan Amendment to change the General Plan and Rural Community Plan land use designations of the site from RR to Low Density Residential (LDR) and Parks and Open Space (P/OS) (see Figure 4). The LDR land use designation provides for single-family detached residential units on lots typically ranging from 6,000 to 10,000 square feet (sf). The allowable residential density for the LDR land use designation ranges from a minimum of 4.1 to a maximum of 7.0 dwelling units per acre (du/ac). It should be noted that the Project would cluster residences beyond the seven du/ac density maximum consistent with General Plan Policy NR-1-9, which allows such clustering to protect wetlands, stream corridors, scenic areas, or other natural features as open space. Although clustered development would exceed the seven du/ac maximum within the East and West neighborhoods, the overall project density would not exceed the maximum allowable density of the LDR land use designation.

Figure 4
Existing and Proposed General Plan Land Use Designations



SUMMARY TABLE

DESIGNATION	LAND USE	EXISTING ACRES	PROPOSED ACRES	ACREAGE DIFF.	EXISTING UNIT RANGE	PROPOSED UNIT RANGE
RR	RURAL RESIDENTIAL (0.1-0.5 DU/AC.)	115.9	0.0	-115.9	12-58 DU	0 DU
LDR	LOW DENSITY RESIDENTIAL (4.1-7.0 DU/AC.)	0.0	91.6	91.6	0 DU	375-641 DU
OS	OPEN SPACE	0.0	19.4	19.4	-	-
RIGHT OF WAY	WATERMAN ROAD & SHELDON ROAD	0.0	4.9	4.9	-	-
TOTAL		**115.9**	**115.9**	**0.0**	**12-58 DU**	**375-641 DU**

The P/OS land use designation provides for public and private parks, public plazas, trails, paseos, and similar features that provide off-street connectivity, and similar compatible uses. The P/OS land use designation also allows for commercial recreation facilities principally oriented toward outdoor use.

Rezone

The Project would require a Rezone to change the zoning designation of the site from AR-2 to Special Planning Area (SPA), as defined by Section 23.16.100 of the City's Municipal Code (see Figure 5). The approved SPA document would serve as site-specific zoning for the area with the boundaries of the SPA, which includes site-specific development standards and criteria for future development proposals. It should be noted that the requested Rezone would include a text amendment to Section 23.40.020 of the City's Municipal Code to add the new SPA.

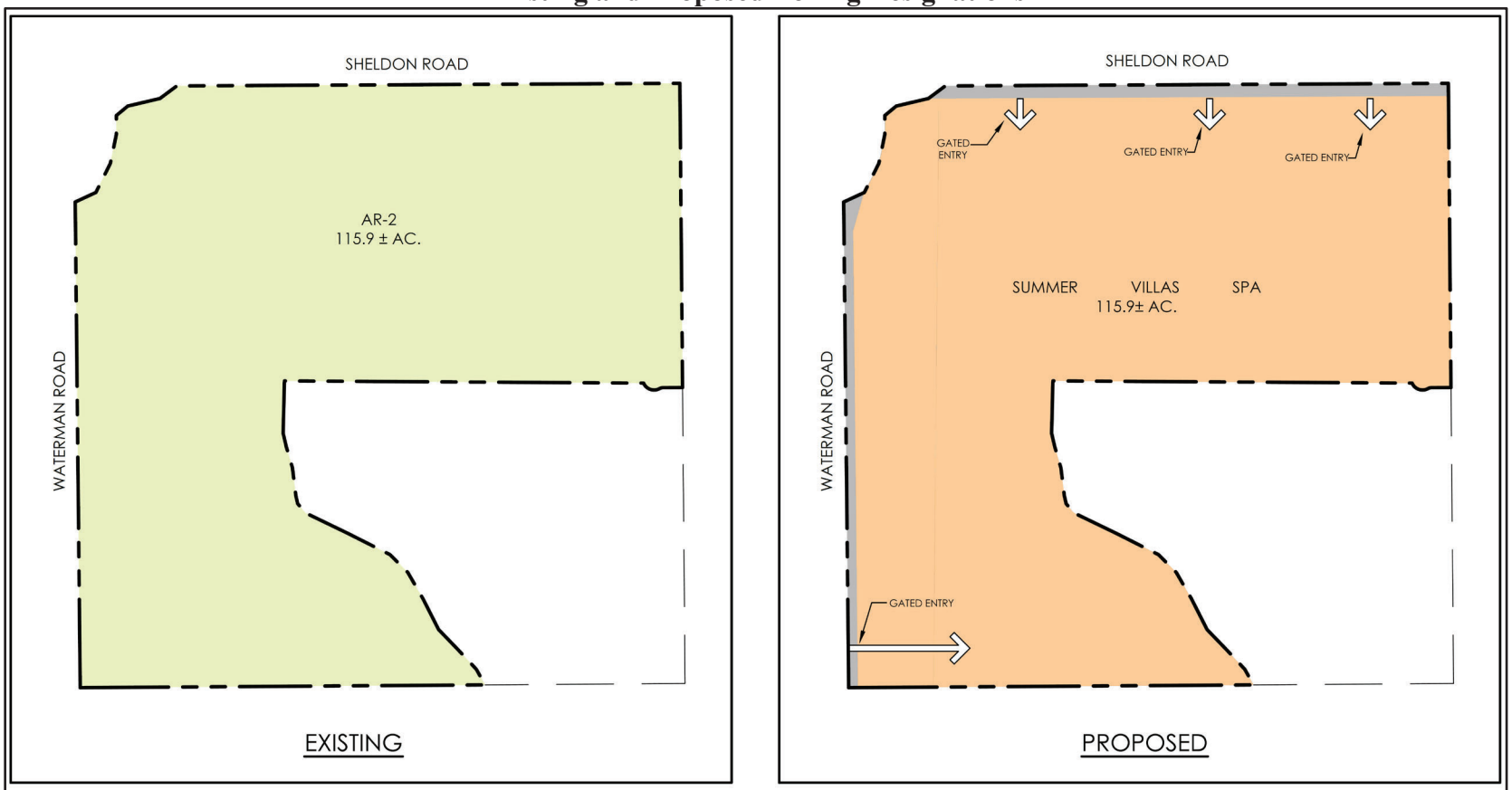
Summer Villas SPA

In accordance with Section 23.16.100 of the EGMC, SPAs regulate properties in areas throughout the City that have unique environmental, historic, architectural, or other features which require special conditions not provided through the application of standard zone regulations. Pursuant to EGMC Section 23.16.100 (D), the SPA is required to be established by ordinance with mandatory contents which include the following: a list of permitted, conditionally permitted, and prohibited uses; performance and development requirements relating to yards, lot area, intensity of development on each lot, parking, landscaping, and signs; other design standards appropriate for the specific site and development; and reasons for establishment of the SPA land use zone on the particular property. The Summer Villas SPA document would require review and approval by the Elk Grove City Council.

Following approval of the Summer Villas SPA document, the SPA, the City of Elk Grove General Plan, EGMC, and Citywide Design Guidelines would regulate all future development applications, subdivision maps, and site plans proposed within the geographic boundaries of the site. All existing City land use policies, design and development standards, and roadway improvement standards would remain in effect, except as provided within the SPA. In instances where the SPA is different or otherwise contrary to the other development standards or codes of the City of Elk Grove, the SPA would prevail and be the controlling document for future development of the site. For example, the final SPA document would include site-specific street, landscaping, and fencing standards.

As discussed above, the Summer Villas SPA contains three distinct sub-zones: 1) Active Adult Neighborhood, 2) Laguna Creek Open Space, and 3) Waterman Recreational Open Space (see Figure 6). As previously discussed, the Summer Villas SPA would not approve any specific development. Rather, the SPA document would adopt site-specific zoning and development standards and criteria for future development proposals. The SPA would allow for potential future development of the 116-acre site with a maximum of 499 age-restricted (55+) single-family homes, as well as various associated improvements, such as a private community recreation center/clubhouse, private park space, private and public trails and open space areas, landscaping, and a number of on- and off-site roadway and utility improvements.

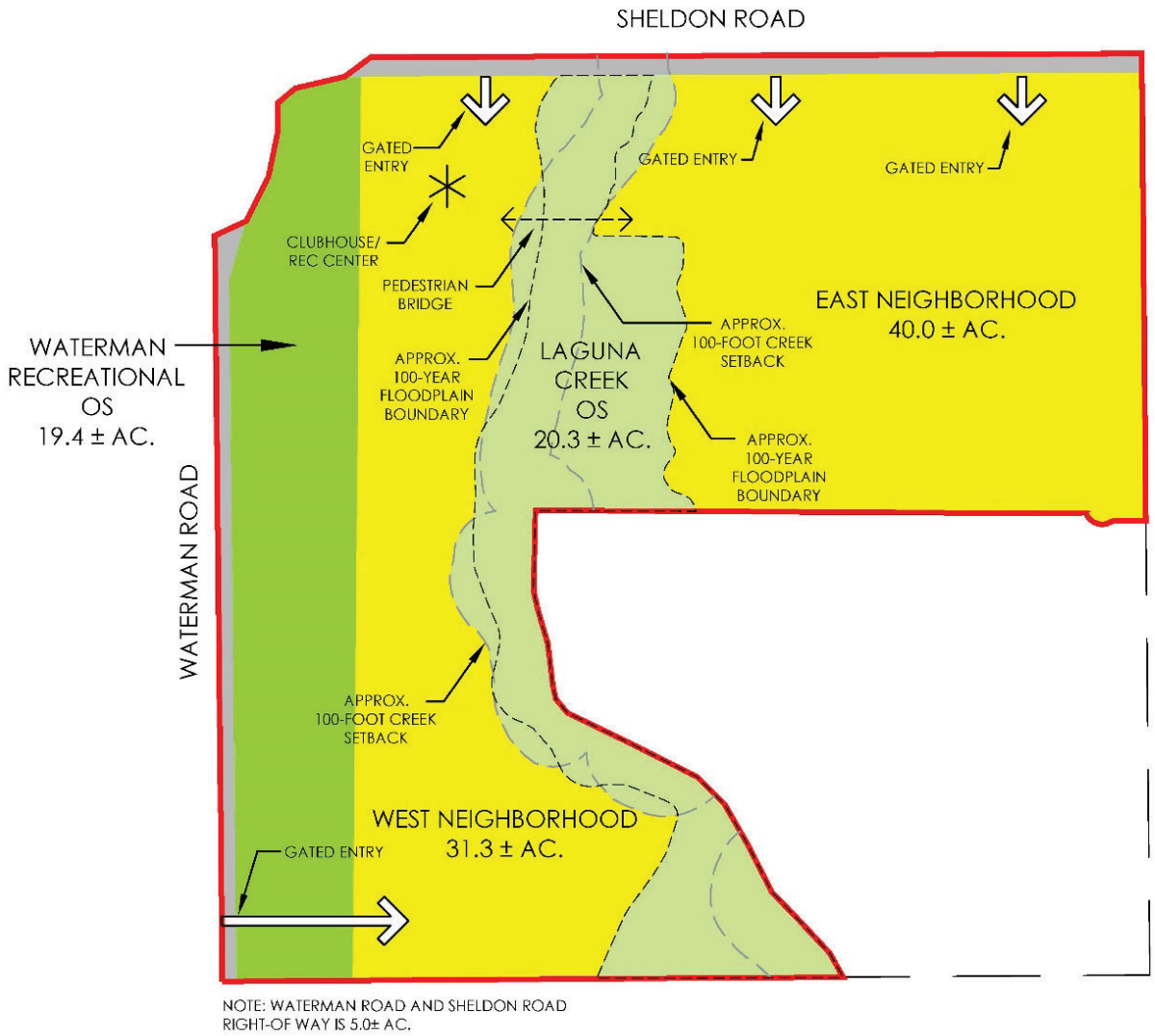
Figure 5
Existing and Proposed Zoning Designations



SUMMARY TABLE

DESIGNATION	LAND USE	EXISTING AC.	PROPOSED AC.	DIFF.
AR-2	AGRICULTURAL RESIDENTIAL	115.9	0.0	-115.9
SPA	SUMMER VILLAS SPA	0.0	111.0	111.0
RIGHT OF WAY	WATERMAN ROAD & SHELDON ROAD	0.0	4.9	4.9
TOTAL		**115.9**	**115.9**	**0.0**

Figure 6
SPA Boundary and Sub-Zones



NOTE: WATERMAN ROAD AND SHELDON ROAD RIGHT-OF WAY IS 5.0± AC.

The final SPA document would establish specific regulations such as maximum density requirements, site-specific development standards, and parking standards.

Utilities

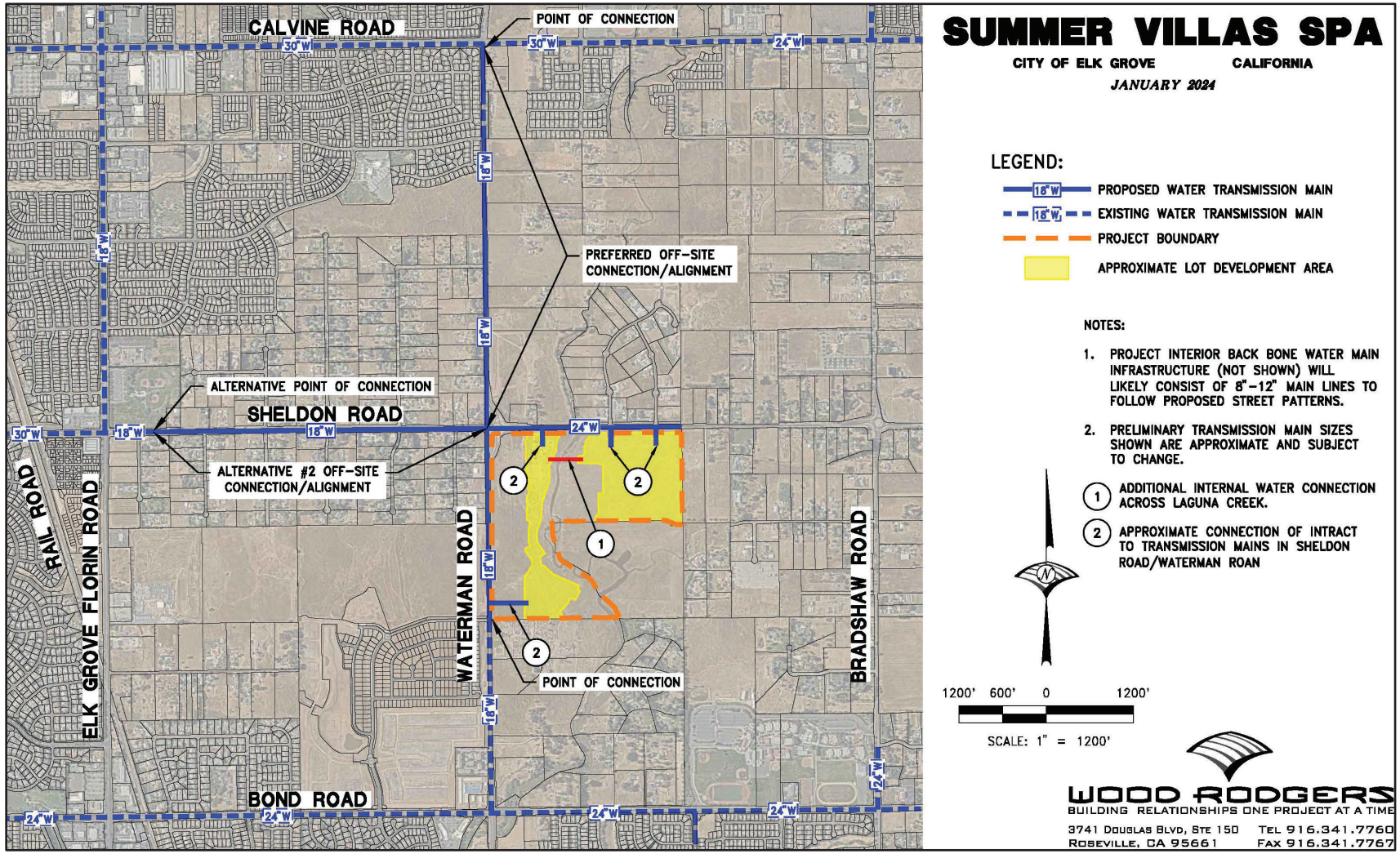
The site does not currently include utilities infrastructure; however, the Project would include water, sanitary sewer, and stormwater improvements, which would connect to existing infrastructure in the project vicinity.

Treated water service for the SPA boundary would be provided by Elk Grove Water District (EGWD)/Sacramento County Water Agency (SCWA). Specifically, the site is located in the north central portion of EGWD's Service Area 2; however, while EGWD owns and maintains the smaller distribution mains (i.e.,12-inch diameter and smaller) within their service area, SCWA owns and maintains the larger transmission main infrastructure in the area. In addition to EGWD's water well supplies, EGWD has maintained a long-standing agreement with SCWA to purchase additional water supplies. Due to the rural nature of the project area, water supplies have typically been provided by individual wells for each parcel. As such, the closest treated water pipelines consist of an 18-inch transmission main in Waterman Road at the Elliott Springs Drive intersection (located at the southwest corner of the site) and another 18-inch transmission main stub in Waterman Road near Calvine Road, approximately one mile north of the site. According to SCWA and EGWD, the approximately 8,000-foot gap between the two 18-inch stubs in Waterman Road would need to be connected to provide the necessary looped system to service the Project. In addition, a 24-inch transmission main would need to be constructed in Sheldon Road along the project frontage to the north. The 24-inch transmission main would cross Laguna Creek by either boring and jacking the line under Laguna Creek or alternatively, attaching the line to the existing Sheldon Road Bridge. As an alternative to extending the 18-inch transmission main to the north in Waterman Road to connect near Calvine Road, the proposed 24-inch transmission main in Sheldon Road could be extended to the west from the Sheldon Road/Waterman Road intersection, connecting to an existing 18-inch transmission main near Elk Grove-Florin Road. The internal on-site water line network would consist of smaller (eight- to 12-inch diameter) pipes located under the internal street system within a dedicated easement. To provide a looped system for the east side of the Project, an additional water line crossing Laguna Creek would need to be provided on-site. Similarly, the crossing would require a bore and jack installation under the creek or could be attached to a bridge over the creek. Figure 7 presents the proposed water system improvements.

Sanitary sewer service for the Project would be provided by the Sacramento Area Sewer District (SacSewer). Based on the SacSewer 2020 System Capacity Plan, the site is located within the BR Bond Sheldon Trunk Shed, which encompasses the rural residential Sheldon area in which the site is located. As described in System Capacity Plan, SacSewer was previously informed by the City of Elk Grove that the rural residential Sheldon area was not planned to be served by public sewers. Consequently, existing backbone gravity sewer infrastructure to serve the Project is not available in proximity to the site.

Because gravity sewer service to the site is not feasible, public sewer service would be provided to the site through the construction of an on-site sewer lift station and corresponding off-site sewer force main, which would discharge to an existing SacSewer gravity sewer network with sufficient residual capacity to support the Project. The proposed on-site lift station is anticipated to be located in the northwest corner of the site.

Figure 7
Proposed Water System Improvements



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According to SacSewer, the closest viable force main discharge point is at MH 282-179-1014, located in Elk Grove-Florin Road approximately 700 feet north of Sheldon Road. As such, the Project would be required to construct approximately 6,500 linear feet of off-site four- to six-inch diameter force main in Sheldon Road and Elk Grove-Florin Road to support the Project.

Figure 8 presents the proposed sewer system improvements. The on-site sewer pipeline network would consist of eight-inch sewer lines located under the proposed roadway network within a dedicated easement and would ultimately outfall to the proposed on-site lift station. Because the developable areas of the site are bisected by Laguna Creek, the gravity system on the east side of the site would require a bore and jack installation under Laguna Creek to achieve outfall to the lift station. The creek crossing would be located parallel to a proposed bicycle/pedestrian crossing of Laguana Creek.

Development of the site would require installation of on-site drainage facilities and alteration of site topography to accommodate the proposed land uses. As discussed previously, Laguna Creek bisects the site. As such, the runoff from the proposed on-site development, as well as runoff from Waterman Road and Sheldon Road along the project frontage, would drain internally, and would ultimately outfall to Laguna Creek. Storm drain system improvements would consist of a combination of storm drain pipeline infrastructure located under the proposed roadway network within a dedicated easement, roadside ditches, drainage basins for storm attenuation and bioretention/low-impact development (LID) features, as well as outfall ditches to Laguna Creek.

Depending upon the final storm drain system configuration, a Conditional Letter of Map Revision (CLOMR) or Letter of Map Revision (LOMR) may need to be filed with the Federal Emergency Management Agency (FEMA) to address modifications to the Laguna Creek floodplain. On-site drainage basins are currently anticipated to be located to the east and west of Laguna Creek outside of the 100-year floodplain. However, final sizing and locations have not been determined at this time. Figure 9 presents the proposed storm drain system improvements.

The Project is within the service area of the Sacramento Municipal Utility District (SMUD) for electricity. Existing electricity lines are currently located along Sheldon Road and Waterman Road in the project area. Telecom, Internet, and other tech service providers will be determined, and their services would be provided to the Project.

The Project would connect to existing dry utility lines within the project vicinity. A 12.5-foot public utility easement for dry utilities (e.g., phone, cable, electricity) would be provided behind the curb of the internal roadways.

Figure 8
Proposed Sewer System Improvements

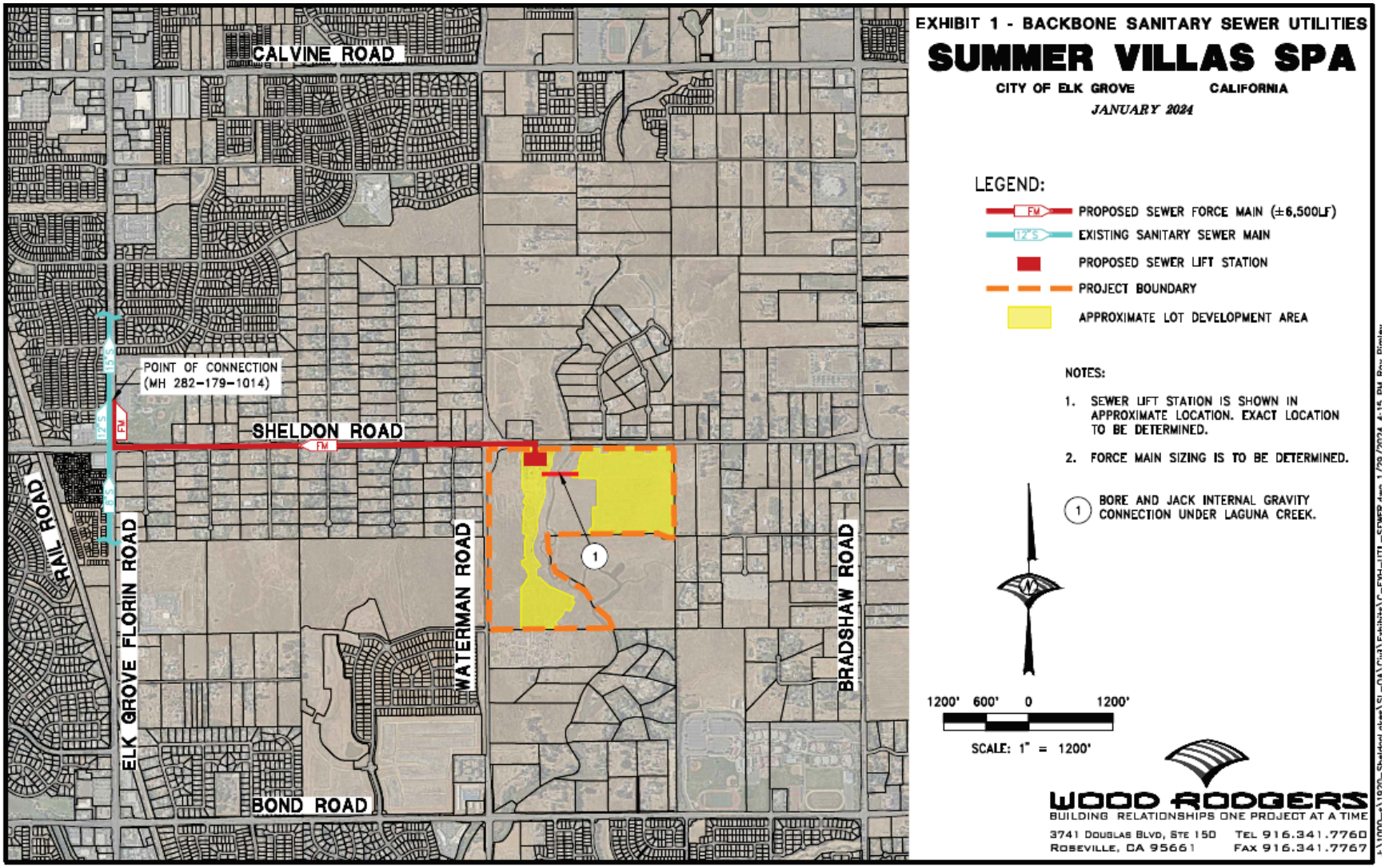

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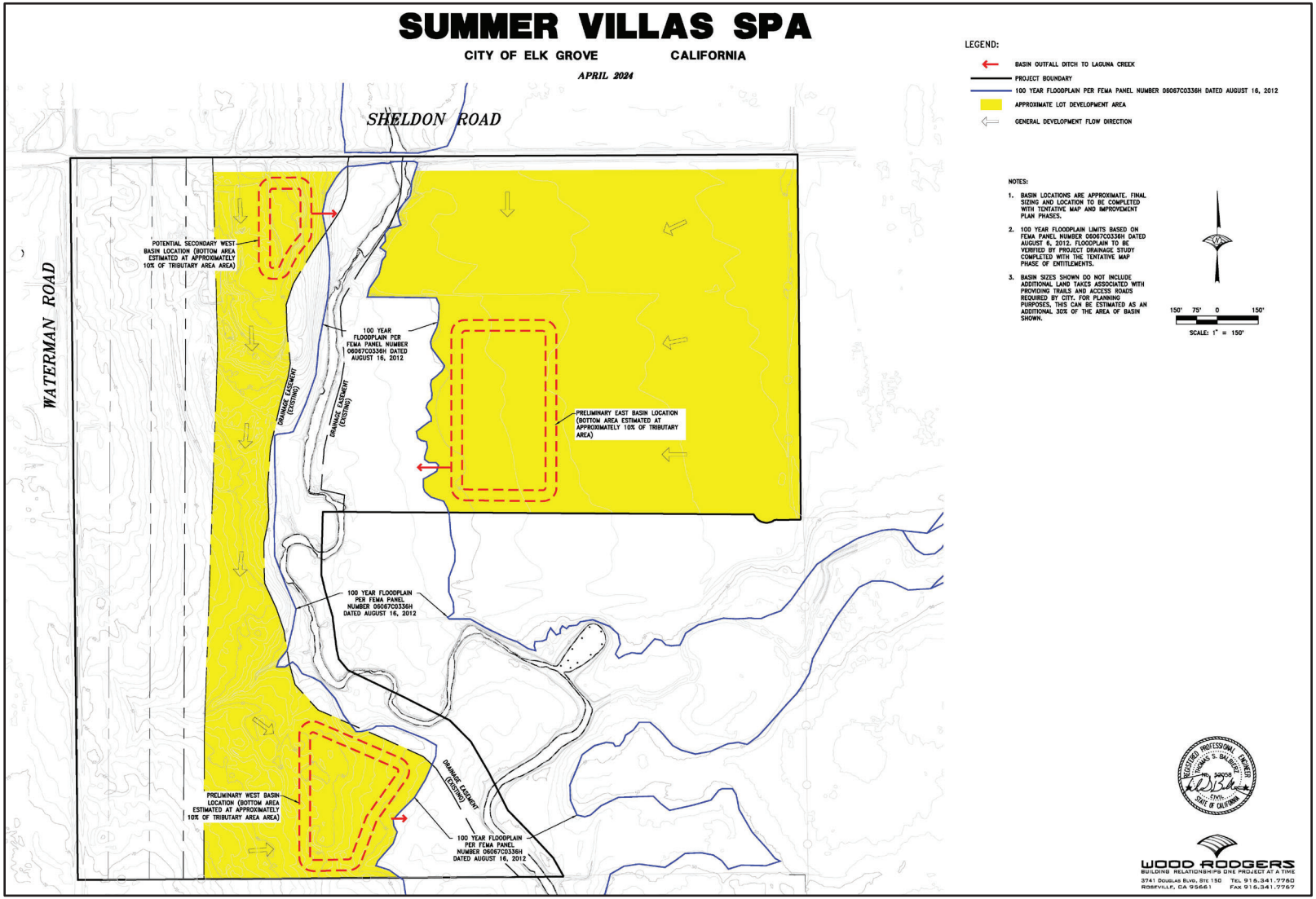
Figure 9
Proposed Storm Drain System Improvements



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PROJECT APPROVALS

The City of Elk Grove has discretionary authority and is the lead agency for the project. The Project would require City approval of the following discretionary actions:

- Certification of the EIR, including adoption of Findings of Fact, a Statement of Overriding Considerations, and a Mitigation Monitoring and Reporting Program;
- Approval of a General Plan/Rural Area Community Plan Amendment from RR to LDR and P/OS;
- Approval of a SPA Ordinance for the Summer Villas SPA.
- Approval of a Text Amendment to the EGMC to add the new SPA.
- Approval of a Rezone from AR-2 to SPA; and

Future development within the Summer Villas SPA would also require additional approvals from the City and other jurisdictional agencies and service providers, as necessary. Such approvals include, but are not limited to, Tentative Map and/or Site Plan approval, Final Map approval and recordation, Improvement Plan review and approval, Grading Permit approval, Encroachment Permit approval, Design Review (as required by Section 23.16.080 of the EGMC), and Building Permit approval.

Review Or Approvals By Other Agencies

The Project may also require permits and/or approvals from a number of other agencies. The agencies could include, but may not be limited to, the following:

- Cosumnes Community Service District (CSD);
- National Pollutant Discharge Elimination System (NPDES) Construction General Permit (Regional Water Quality Control Board [RWQCB] – Central Valley Region);
- NPDES Phase I MS4 General Permit (RWQCB – Central Valley Region);
- SacSewer;
- Sacramento Metropolitan Air Quality Management District (SMAQMD); and
- SCWA.

The EIR will provide environmental information to the aforementioned agencies and other public agencies, which may be required to grant approvals or coordinate with other agencies, as part of project implementation.

APPROACH TO ENVIRONMENTAL REVIEW

As required by CEQA, the EIR will describe existing conditions and evaluate the potential environmental effects of the Project and a reasonable range of alternatives, including a No Project alternative. The EIR will address direct, indirect, cumulative, and growth inducing effects, and will identify feasible mitigation measures, if available, to reduce significant and potentially significant impacts.

Consistent with Appendix G of the CEQA Guidelines, the City anticipates that the EIR will contain the following chapters:

- Aesthetics
- Air Quality and Greenhouse Gas Emissions (including Energy)
- Biological Resources
- Cultural and Tribal Cultural Resources
- Geology and Soils
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning/Population and Housing
- Noise
- Public Services/Utilities and Service Systems
- Transportation
- Effects Not Found to be Significant
- Statutorily Required Sections
- Alternatives Analysis

POTENTIAL ENVIRONMENTAL EFFECTS

Each chapter of the EIR will include identification of the thresholds of significance, identification of project-level and cumulative impacts, and the development of mitigation measures and monitoring strategies, as required. The proposed EIR will reference the City of Elk Grove General Plan, the City's General Plan EIR, and the EGMC, where applicable. In addition to the foregoing documents, project-specific technical studies are being prepared by technical experts. The following environmental topic areas are preliminarily anticipated to be evaluated in the EIR:

- **Aesthetics** — The EIR will describe existing regional and project area aesthetics and visual conditions. To the extent applicable, the chapter will describe project-specific impacts on scenic vistas, visual character, or quality of the project area, as well as effects of light and glare. Pursuant to Appendix G of the CEQA Guidelines, the analysis will focus on the Project's potential impacts and whether the Project will substantially degrade the existing visual character or quality of public views.

- **Air Quality and Greenhouse Gas Emissions** — The EIR will include an air quality impact analysis, consisting of a quantitative assessment of short-term (i.e., construction) and long-term (i.e., operational) increases of criteria air pollutant emissions of primary concern (i.e., reactive organic gases [ROG], nitrogen oxides [NO_X], and particulate matter [PM], including $PM_{2.5}$ and PM_{10}). The air quality and greenhouse gas (GHG) emissions analysis for the Project will be performed using the California Emissions Estimator Model (CalEEMod) software program and following SMAQMD guidelines. The analysis will also address any potential odor impacts that may occur, as well as toxic air contaminant (TAC) emissions and potential impacts to human health.

  The GHG emissions analysis will include a quantitative estimate of carbon dioxide equivalent emissions from the Project, including indirect emissions (e.g., electricity, propane) and construction emissions. In addition, the chapter will include an analysis of the Project's consistency with the City's Climate Action Plan (CAP). This chapter will also evaluate whether the Project could result in any potentially significant effects related to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. The discussion will incorporate any potential conflicts with State or local plans regarding renewable energy.

- **Biological Resources** — The Biological Resources chapter of the EIR will summarize potential effects on sensitive natural communities, special-status plant and wildlife species, and wetlands. The chapter will be based on an Arborist Report, Biological Resources Assessment (BRA), and Wetland Delineation. Mitigation measures for all identified impacts will be developed consistent with applicable laws and regulations.

- **Cultural and Tribal Cultural Resources** — The EIR will describe the potential effects to any on-site historical, archaeological, and tribal cultural resources from the Project. The chapter will be based on a Cultural Resources Report. Input from tribes who were alerted and consulted, as required by the passage of AB 52, SB 18, and the associated amendments to Public Resources Code 21080.3.1, will be incorporated into the Tribal Cultural Resources portion of the chapter.

- **Geology and Soils** — The Geology and Soils chapter of the EIR will summarize the geological setting and describe the potential effects from soil erosion, earthquakes, liquefaction, expansive/unstable soils, as well as identify any known paleontological resources or unique geological features within the site. The chapter will be based primarily on a site-specific Geotechnical Report.

- **Hazards and Hazardous Materials** — The EIR will describe any potential for existing or possible hazardous materials within the project area. The chapter will also assess the potential for the Project to create a significant hazard to the public or environment through the routine transport, use, or disposal of hazardous materials. The chapter will primarily be based on site-specific Phase I Environmental Site Assessment (ESA).

  Impacts of the environment on a project (as opposed to impacts of a project on the environment) are beyond the scope of required CEQA review. The California Supreme Court has held that, "CEQA does not generally require an agency to consider the effects of existing environmental conditions on a Project's future users or residents. What CEQA does mandate… is an analysis of how a project might exacerbate existing environmental hazards." As such, the mere presence of possible hazardous materials at the site or in the vicinity, should such exist, would be considered an existing environmental condition and, thus, would not be considered an impact under CEQA. Rather, the Project could have the potential to result in an impact associated with possible hazardous materials should the Project exacerbate the existing conditions (e.g., contaminated soils become airborne during ground-disturbing activities and expose construction workers or future residents of the Project).

- **Hydrology and Water Quality** — The EIR will identify potential Project impacts on stormwater drainage, flooding, groundwater, and water quality, including stormwater runoff water quality. The chapter will be primarily based on a Stormwater Quality Report.

- **Land Use and Planning/Population and Housing** — This chapter of the EIR will evaluate the consistency and compatibility of the Project with the plans and policies adopted by the City of Elk Grove for the purpose of avoiding or mitigating an environmental effect. In addition, the chapter will include an evaluation of the potential for any significant unplanned population growth in the area, either directly or indirectly.

- **Noise** — The Noise chapter of the EIR will be based on a project-specific Noise Study. The chapter will address potential noise impacts resulting from project construction and operation, including existing and future traffic noise levels on the local road. Because the majority of the noise experienced at the site is anticipated to originate from vehicle sources, traffic noise levels will be evaluated under the same conditions as the Traffic Impact Analysis (TIA) prepared for the EIR. Noise-sensitive land uses or activities in the project vicinity will be identified and examined. Furthermore, ambient noise and vibration level measurements on, and in the vicinity of, the site will be conducted to quantify existing background noise and vibration levels for comparison to the predicted Project-generated levels.

- **Public Services/Utilities and Service Systems** — The EIR will evaluate whether the Project could significantly increase demands upon local service providers (e.g., fire, police, schools). In accordance with Appendix G, the focus of the analysis will be on whether the Project's demand would require physical alteration of, or need for new governmental facilities, to maintain acceptable service ratios, response times, or other performance objectives, the construction of which could cause significant environmental impacts.

  Additionally, the chapter will evaluate the Project's increase in water supply demand and wastewater generation to determine whether the existing water and sewer infrastructure systems can accommodate demands from the Project, or if system upgrades would be required. Evaluation of the proposed sewer, water, and drainage improvements will also be included in the chapter. The chapter will also evaluate the receiving landfill's capacity to accommodate the increase in solid waste, the electricity usage, and the natural gas service associated with the Project.

- **Transportation** — The Transportation chapter of the EIR will be based on a TIA prepared specifically for the Project, which will include an evaluation of potential impacts related to vehicle miles traveled (VMT). The EIR chapter will also include an analysis of the Project's potential to conflict with the City's programs, policies, ordinances, or policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, as well as emergency access.

- **Effects Not Found to be Significant** — Section 15128 of the CEQA Guidelines states that an EIR shall contain a brief statement indicating the reasons that various possible significant effects of a project were determined not to be significant and were, therefore, not discussed in detail in the EIR. Accordingly, this Effects Not Found to be Significant chapter of the EIR is anticipated to potentially include abbreviated discussions on agricultural and forestry resources, mineral resources, and wildfire.

- **Statutorily Required Sections** — Pursuant to CEQA Guidelines Section 21100(B)(5), the Statutorily Required Sections chapter of the EIR will address the potential for significant growth-inducing impacts of the Project, and whether removal of any impediments to growth would occur with the Project. Any significant and unavoidable impacts identified within the EIR will be included in this chapter, as well as a discussion of significant irreversible impacts. The chapter will generally describe the cumulative setting for the Project.

- **Alternatives Analysis** — In accordance with Section 15126.6 of the CEQA Guidelines, the EIR will include an analysis of a range of alternatives, including a No Project Alternative. The project alternatives will be selected when more information related to project impacts is available, in order to be designed to reduce significant project impacts. The Alternatives Analysis chapter will describe the project alternatives and identify the environmentally superior alternative. The alternatives will be analyzed at a level of detail less than that of the Project; however, the analyses will include sufficient detail to allow a meaningful comparison of the impacts.