Summer Villas Special Planning Area Project

SCH# 2024080407

Final Environmental Impact Report

Prepared for

City of Elk Grove

October 2026

Prepared by

RANEY PLANNING & MANAGEMENT, INC. 25 years

1501 Sports Drive, Suite A, Sacramento, CA 95834

Summer Villas Special Planning Area Project
Final Environmental Impact Report

SCH# 2024080407

Lead Agency

City of Elk Grove
Community Development Department
8401 Laguna Palms Way
Elk Grove, CA 95758

Kyra Killingsworth
Senior Planner
(916) 478-3684

Prepared By

Raney Planning and Management, Inc.
1501 Sports Drive, Suite A
Sacramento, CA 95834
(916) 372-6100

Contact:
Rod Stinson
Vice President/Air Quality Specialist

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1. Introduction and List of Commenters

1. INTRODUCTION AND LIST OF COMMENTERS

1.1 INTRODUCTION

This Final Environmental Impact Report (EIR) contains comments received during the public review period of the Summer Villas Special Planning Area Project (Project) Draft EIR. This document has been prepared by the City of Elk Grove as the Lead Agency, in accordance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines, Section 15132. The Introduction and List of Commenters chapter of the Final EIR discusses the background of the Draft EIR and purpose of the Final EIR, and provides an overview of the Final EIR's organization.

1.2 BACKGROUND

The Draft EIR identified the Project's potential impacts and the mitigation measures that would be required to be implemented. The following environmental analysis chapters are contained in the Project Draft EIR:

- Aesthetics;
- Air Quality, Greenhouse Gas Emissions, and 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 and Utilities;
- Transportation;
- Effects not Found to be Significant;
- Statutorily Required Sections; and
- Alternatives Analysis.

In accordance with CEQA, the City of Elk Grove used the following methods to solicit public input on the Draft EIR:

- Notice of Preparation (NOP) for the Draft EIR was released for a 30-day public review from August 9, 2024, to September 9, 2024.
- The NOP was recirculated to reflect revised descriptions to the surrounding uses and the NOP comment period was extended from September 9, 2024, to October 9, 2024.
- A public scoping meeting was held on September 23, 2024, to solicit public comments regarding the scope of the Draft EIR. The NOP comment letters are included as Appendix B to the Draft EIR.
- On October 10, 2025, the Draft EIR was delivered to the State Clearinghouse for distribution to State agencies, resulting in a 45-day public review period from October 10, 2025, to November 24, 2025.

- On October 10, 2025, a Notice of Availability (NOA) of the Draft EIR was posted to the City's website, posted to the State Clearinghouse, and mailed to local agencies and interested members of the public.
- The City posted the Draft EIR on the City of Elk Grove website.
- Copies of the Draft EIR are available for review at the City of Elk Grove offices at 8401 Laguna Palms Way and the Elk Grove Library at 8900 Elk Grove Boulevard.
- A public comment meeting was held on November 13, 2025, to solicit public comments on the Draft EIR. A written summary of the verbal comments received during the public comment meeting is included within this Final EIR.

All public commenters are listed in this chapter, and written responses to comments received on the Draft EIR are included in Chapter 2, Response to Comments, as discussed in more detail in Section 1.4 of this chapter.

1.3 PURPOSE OF THE FINAL EIR

Pursuant to CEQA Guidelines Section 15132, this Final EIR consists of the following:

1. The Draft EIR or a revision of the Draft EIR;
2. Comments and recommendations received on the Draft EIR;
3. A list of persons, organizations, and public agencies commenting on the Draft EIR;
4. The responses to significant environmental points raised in the review process; and
5. Any other information added by the Lead Agency.

Although CEQA requires responses for "significant environmental issues" only, the City has provided responses to all comments. This is not intended to expand the City's legal obligations under CEQA but rather to maximize opportunities for sharing information and increasing public understanding regarding the Project and the related review process.

1.4 LIST OF COMMENTERS

The City of Elk Grove received a total of 51 comment letters on the Draft EIR for the Project, including one letter that was received after the close of the public review comment period. The comment letters were authored by the following agencies, groups, and individuals. The letters are organized alphabetically by first name within each category.

Agencies

Letter 1 ..... California Department of Fish and Wildlife (CDFW)
Letter 2 ..... Sacramento Area Sewer District (SacSewer)
Letter 3 ..... Sacramento Metropolitan Air Quality Management District (SMAQMD)
Letter 4 ..... U.S. Department of Energy Western Area Power Administration (WAPA)

Groups

Letter 5 ..... Anonymous-Concerned Residents Group
Letter 6 ..... Greater Sheldon Road Estates HOA (GSREHA) (1 of 2)
Letter 7 ..... GSREHA (2 of 2)

Individuals

Letter 8 ..... Amelia Vankeuren
Letter 9 ..... Angela Giordano

Letter 10 ..... August and Ann Saibeni
Letter 11 ..... Brianna Pasillas
Letter 12 ..... Carlos Zamarripa (1 of 2)
Letter 13 ..... Carlos Zamarripa (2 of 2)
Letter 14 ..... Christina and Debbie Gentil
Letter 15 ..... Dalenah Rowe
Letter 16 ..... Daniel and Lucinda Kristic
Letter 17 ..... Delany Kennedy
Letter 18 ..... Diane Owen
Letter 19 ..... George Murphey (1 of 2)
Letter 20 ..... George Murphey (2 of 2)
Letter 21 ..... GM Mendoza
Letter 22 ..... Jacqueline Onyon
Letter 23 ..... James Fox
Letter 24 ..... James and Kendra Schmidt
Letter 25 ..... Jamie Olson
Letter 26 ..... Kimberly Paulson
Letter 27 ..... Lea
Letter 28 ..... Lima Huy
Letter 29 ..... Lynn Wheat
Letter 30 ..... Managing Partner of John Campbell Ranches
Letter 31 ..... Mark and Jane White
Letter 32 ..... Matt Arnold
Letter 33 ..... Melisa Robinson
Letter 34 ..... Melissa Silva
Letter 35 ..... Melvin Scott
Letter 36 ..... Michelle Pennington-Phillips
Letter 37 ..... Nancy Knott
Letter 38 ..... Paul Giordano
Letter 39 ..... Paul Johanneson
Letter 40 ..... Rachell Owen-Reinwald
Letter 41 ..... Ramona Johanneson (1 of 2)
Letter 42 ..... Ramona Johanneson (2 of 2)
Letter 43 ..... Robert “Doc” Souza
Letter 44 ..... Ross Ozaki
Letter 45 ..... Shannon Machovec
Letter 46 ..... Steve and Kathy Lee
Letter 47 ..... Suzanne Pecci
Letter 48 ..... Taran Meyer
Letter 49 ..... Tuyen Servin
Letter 50 ..... Vanessa Ulibas
Letter 51 ..... Viet Nguyen

In addition, verbal comments were received during the public meeting facilitated by City staff at Council Chambers on November 13, 2025, to solicit public comments regarding the Draft EIR. A transcription from the recording of the verbal comments from the public meeting is included as Letter 52.

Letter 52 ..... Transcription of Verbal Comments: Draft EIR Public Meeting (November 13, 2025)

1.5 CERTIFICATION OF THE FINAL EIR

State law requires that the City make several types of CEQA "findings" at the time of final action on the Project. Findings describe the conclusions reached regarding particular issues, including specific evidence in support of those conclusions. The Final EIR typically provides much of the substantial evidence to support these findings. The required findings for the Project are as follows:

- Certification of the Final EIR (CEQA Guidelines Section 15090) – These findings support the adequacy of the Final EIR for decision-making purposes. The Lead Agency must make the following three determinations in certifying a Final EIR:

    1. The Final EIR has been completed in compliance with CEQA.
    2. The Final EIR was presented to the decision-making body of the Lead Agency, and the decision-making body reviewed and considered the information in the Final EIR prior to approving the Project.
    3. The Final EIR reflects the Lead Agency's independent judgment and analysis.

- Findings Regarding Significant Impacts and Project Alternatives (CEQA Guidelines Section 15091) – These findings explain how the City chose to address each identified significant impact, including the mitigation measures adopted or an explanation of why such measures are infeasible. A discussion of the feasibility of Project alternatives is also required by this section (see also CEQA Guidelines Section 15126.6[f]).

Pursuant to CEQA Guidelines, Section 15093(b), when a Lead Agency approves a project that would result in significant unavoidable impacts, the agency must state in writing the reasons supporting the action (Statement of Overriding Considerations). The Statement of Overriding Considerations shall be supported by substantial evidence. The Project would result in significant and unavoidable impacts related to Aesthetics; Air Quality, Greenhouse Gas Emissions, and Energy; Land Use and Planning/Population and Housing; Noise; and Transportation. Thus, a Statement of Overriding Considerations must be adopted if the Project is approved.

1.6 ORGANIZATION OF THE FINAL EIR

The Final EIR is organized into the following chapters:

1. Introduction and List of Commenters

Chapter 1 provides an introduction and overview of the document, describes the background of the Draft EIR and the purposes of the Final EIR, provides a list of commenters, and describes the organization of the Final EIR.

2. Responses to Comments

Chapter 2 presents the comment letters received, and responses to each comment. Each comment letter received has been numbered at the top and bracketed to indicate how the letter has been divided into individual comments. Each comment is given a number with the letter number appearing first, followed by the comment number. For example, the first comment in Letter 1 would have the following format: 1-1. The response to each comment will reference the comment number.

3. Revisions to the Draft EIR Text

Chapter 3 summarizes changes made to the Draft EIR text including clarifications, modifications, and amplifications of the analysis. Section 15088.5 of the State CEQA Guidelines states that a lead agency is required to recirculate a Draft EIR when "significant new information" is added to the document after public notice is given of the availability of the Draft EIR for public review under Section 15087 but before certification. Pursuant to this section, the term "information" can include changes in the Project or environmental setting, as well as additional data or other information. New information added to an EIR is not considered "significant" unless the conclusions of the EIR are changed in a way that deprives the public of a meaningful opportunity to comment upon a new substantial adverse environmental effect of the Project or a feasible way to mitigate or avoid such an effect (including a feasible Project alternative) that the City has decided not to implement.

"Significant new information" requiring recirculation includes any of the following:

1. A new significant environmental impact would result from the Project or from a new mitigation measure proposed to be implemented.
2. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
3. A feasible Project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the Project, but the Project's proponents decline to adopt it.
4. The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

Recirculation is not required where the new information added to the EIR merely clarifies, amplifies, or makes insignificant modifications in an adequate EIR. The modifications to the Draft EIR identified in Chapter 3 have been examined with these requirements and obligations in mind. The City has determined that the provisions of Section 15088.5 of the CEQA Guidelines are not triggered and recirculation of the Draft EIR is not required. A more detailed description of this determination will be included in the CEQA Findings of Fact described above.

4. Mitigation Monitoring and Reporting Program

CEQA Guidelines, Section 15097, requires lead agencies to adopt a program for monitoring the mitigation measures required to avoid the significant environmental impacts of a project. The intent of the Mitigation Monitoring and Reporting Program (MMRP) is to ensure implementation of the mitigation measures identified within the Draft EIR for the Project.

2. Responses to Comments

2. RESPONSES TO COMMENTS

2.1 INTRODUCTION

This chapter contains responses to comments received by the City of Elk Grove during the Summer Villas Special Planning Area Project (Project) Draft Environmental Impact Report (EIR) public review period.

2.2 MASTER RESPONSES

Many of the commenters raised similar concerns regarding the Project. For such concerns, the City has prepared master responses. Through master responses, the City can address the common topics in a comprehensive manner and without duplication in the individual responses. Some of the thematic comments submitted on the Draft EIR pertain to issues that are not considered significant impacts on the environment under the California Environmental Quality Act (CEQA), as will be discussed in Master Responses 1 and 2. The issues to be addressed include administrative issues and traffic congestion. In addition, the selection and evaluation of project alternatives is addressed in Master Response 3.

The following is a list of the master responses provided.

- Master Response 1: Non-EIR/Administrative Issues (Merits of the Project)
- Master Response 2: Transportation
- Master Response 3: Alternatives

Master Response 1: Non-EIR/Administrative Issues (Merits of the Project)

Master Response 1 addresses several thematic public comments related to issues not discussed in the Draft EIR and administrative issues.

Comments

The CEQA Guidelines frame the scope and focus of review and the extent, nature and scope of responses by a lead agency to comments on a Draft EIR. This Final EIR addresses specific comments pertaining to environmental impact analyses contained within the Draft EIR and acknowledges comments not related to environmental impact and analysis. However, a number of comments received expressed the commenter's opinion on approval or denial of the Project and/or general environmental concerns. The discussion below provides a response to such thematic comments, which are either too general to allow for a detailed response or unrelated to the Project's impacts on the physical environment.

Discussion

According to CEQA Guidelines Section 15204, comments on an EIR should focus on the adequacy of the Draft EIR. CEQA Guidelines, Section 15204 states the following:

> (a) In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and

> ways in which the significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.
>
> (c) Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.

Notwithstanding the above guidelines language, CEQA Guidelines Section 15204(e) states that these limitations should "not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section."

Comments on Merits of Project

The environmental review process provides an impartial evaluation of the environmental impacts should the Project be implemented. The environmental review does not provide an opinion regarding whether the Project should be approved or denied. The City is the public agency with land use authority and the City of Elk Grove Community Development Department is the primary City department providing information and recommendations on land development to the Planning Commission and City Council. These appointed and elected decision-makers weigh factors outside the scope of the EIR, including public support, taxes, jobs, economic and social benefits, and other non-environmental factors, in considering whether to approve a Project.

Comments in general support/opposition of the Project that do not convey significant environmental issues within the meaning of CEQA are hereby noted and referred to the decision-makers for consideration in their deliberations for approval or denial of the Project.

Pursuant to the CEQA Guidelines, in reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the Project might be avoided or mitigated. When responding to comments, lead agencies need only respond to significant environmental issues. This master response recognizes that many public comments submitted on the Draft EIR are outside of the scope of CEQA; and thus, do not require a specific response from the City. Nevertheless, this Final EIR includes all comments for the record and review and consideration by the decision-makers.

General Comments Pertaining to Environmental Concerns

Comments that voiced general opposition to or support for the Project often were combined with other general statements about environmental concerns (e.g., related to air quality, traffic, noise, etc.). According to CEQA Guidelines Section 15088, "The level of detail contained in the response, however, may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general). A general response may be appropriate when a comment

does not contain or specifically refer to readily available information, or does not explain the relevance of evidence submitted with the comment." Thus, when a commenter expresses general concerns such as that the Project would result in "more traffic", "increased traffic safety hazards", "increased air pollution", or "increased noise", a specific response is not offered. Rather, the commenter is referred to those sections of the Draft EIR where the referenced general concern is evaluated in detail. For example, potential Project-related transportation impacts are evaluated in Chapter 4.11, Transportation, of the Draft EIR. The Project-related increase in air quality emissions and the related effect on the surrounding environment is addressed in Chapter 4.2, Air Quality, Greenhouse Gas Emissions, and Energy, and potential impacts related to noise and vibration associated with construction and operation of development associated with the Project are addressed in Chapter 4.9, Noise, of the Draft EIR, etc. The additional chapters of the Draft EIR address potential impacts related to aesthetics, 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, and public services and utilities.

Comments Pertaining to Community Character and Social Impacts

As discussed on page 4.1-1 of the Draft EIR, in *Preserve Poway v. City of Poway* (2016) 245 Cal.App.4th 560, the Appellate Court evaluated whether community character is a consideration in CEQA and whether changes to community character or social impacts constitute an environmental impact under CEQA. The Court determined CEQA does not require an analysis of subjective psychological feelings or social impacts. Rather, CEQA's overriding and primary goal is to protect the physical environment. CEQA defines a "significant effect on the environment" as "substantial, or potentially substantial, adverse changes in physical conditions ...." (California Public Resources Code [PRC] Section 21100. subd. [d]). As such, the Draft EIR analysis of aesthetic impacts focuses on potential physical changes to visual character or quality of the site and surrounding area, and is limited to tangible, physical evidence of whether or not the Project is visually inconsistent with the surrounding community (rather than a psychological "feel"). Therefore, comments concerning potential social effects of the project, including quality of life comments, need not be analyzed or addressed further.

Master Response 2: Transportation

Master Response 2 addresses several thematic public comments related to existing congestion and increased congestion and traffic volumes resulting from buildout of the Project.

Comments

A number of comments received discussed the Project's potential impacts to vehicle traffic in the Project vicinity. The below discussion provides a response to such thematic comments.

Discussion

Level of Service (LOS) is used to measure the quality of vehicle travel and takes into consideration the capacity of roadways and intersections as well as the average delay to drivers. LOS measurements focus on the experience of the driver and the measurement is tied to traffic volumes and congestion. However, pursuant to the CEQA Guidelines Section 15064.3, effective July 1, 2020, environmental documents must use vehicle miles traveled (VMT) rather than LOS as the metric to analyze transportation impacts. Section 21099(b)(2) of the PRC states that "automobile delay, as described solely by level of service or similar measures of vehicle capacity

or traffic congestion, shall not be considered a significant impact on the environment." Guidance[1] provided by the California Department of Transportation (Caltrans) on analysis of safety for CEQA indicates that "*automobile congestion or delay itself does not constitute a significant environmental impact (PRC, Section 21099 (b)(2)), and traffic safety should not be used as a proxy for road capacity."*

In addition, the City's adopted Transportation Analysis Guidelines, updated December 2023, provide guidance regarding the City's preferred methods for conducting transportation analyses. The Transportation Analysis Guidelines establish City-specific VMT thresholds and reduction strategies. The City of Elk Grove currently uses VMT procedures and standards consistent with technical guidance published by the Governor's Office of Land Use and Climate Change (LCI) (formerly the Office of Planning and Research [OPR]). Consistent with CEQA Guidelines Section 15064.7, the City selected VMT per service population as the preferred performance metric for implementing its VMT policy. In addition, the City of Elk Grove uses VMT performance targets by General Plan land use category and VMT limits for the City and study areas, which is an additional step to ensure consistency with the General Plan.

Therefore, consistent with both the CEQA Guidelines and the City's Transportation Analysis Guidelines, the analysis and mitigation measures included in Chapter 4.11, Transportation, of the Draft EIR focuses on VMT and not on the effects of the Project on traffic conditions or congestion along roadways in the Project vicinity, such as Waterman Road or Sheldon Road. The State's requirement to transition from LOS to VMT is aimed at promoting infill development, public health through active transportation, and a reduction in greenhouse gas (GHG) emissions.

Nonetheless, while not required by CEQA, the City's General Plan has adopted Roadway Performance Target policies that address both roadway intersection delays and roadway daily traffic design. To evaluate the Project's consistency with said policies, separate from the CEQA assessment, an analysis of the Project in comparison to the standards of the policies is provided in a separate Project-specific Transportation Analysis Report prepared by Fehr & Peers. The Transportation Analysis Report evaluated the existing roadway conditions as well as roadway conditions resulting from implementation of the Project. The Transportation Analysis Report will be provided in the Project staff reports and made available to the public and decision-makers to be considered outside the CEQA process.

Master Response 3: Alternatives

Master Response 3 addresses several thematic public comments related to Project alternatives.

Comments on the Selection of Alternatives

Several comments received on the Draft EIR were related to the number of alternatives analyzed in Chapter 7, Alternatives Analysis, of the Draft EIR as well as the content contained in the Alternatives Analysis.

Discussion on the Selection of Alternatives

As discussed on page 7-1 of the Draft EIR, CEQA Guidelines Section 15126.6(a) provides that the primary intent of the alternatives evaluation in an EIR is to "[…] describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the

[1] California Department of Transportation. *Local Development Review Safety Practitioners Guidance*. February 2024.

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 must include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Project. The alternatives analysis is not required to consider every Project alternative but is governed by a "rule of reason" that requires the Draft EIR to set forth only those alternatives necessary to permit a reasoned choice (see CEQA Guidelines Section 15126.6[a]). In addition to the alternatives considered in the Draft EIR, the Alternatives Analysis included alternatives considered but dismissed from further analysis. As discussed in detail on page 7-4 of the Draft EIR, the Off-Site Alternative and the Increased Density Alternative were considered but dismissed from detailed analysis. Pursuant to CEQA Guidelines 15126.6(c), an alternative may be eliminated from detailed consideration due to failure to meet most of the basic Project objectives, infeasibility, or inability to avoid significant environmental impacts. The alternatives considered but dismissed from further analysis are discussed in further detail on pages 7-4 through 7-6 of the Draft EIR.

The alternatives considered in Chapter 7 of the Draft EIR, including the No Project (No Build) Alternative, the No Project (Buildout Pursuant to General Plan) Alternative, and the Aquatic Resource Avoidance Alternative, capture a range of potential project alternative characteristics designed to reduce impacts associated with the Project. Therefore, the alternatives considered in Chapter 7, Alternatives Analysis, of the Draft EIR adequately represent a "range of reasonable alternatives", as required by CEQA Guidelines Section 15126.6(a).

Comments on the Selection of an Environmentally Superior Alternative

Several comments received on the Draft EIR addressed the selection of the Environmentally Superior Alternative within the Alternatives chapter.

Discussion on the Selection of an Environmentally Superior Alternative

As discussed above and on page 7-6 of the Draft EIR, reasonable alternatives to the Project must be capable of avoiding or substantially lessening a new significant impact or substantial increase in severity of a significant impact, as identified by the Draft EIR. Therefore, the analysis of alternatives focuses on the resource areas and specific impacts that have been identified in the Draft EIR for the Project as requiring mitigation to reduce significant impacts to a less-than-significant level, or have been found to remain significant and unavoidable. The specific impacts analyzed in Chapter 7 of the Draft EIR include Aesthetics; Air Quality, GHG Emissions, and 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, and Transportation. In addition, CEQA Guidelines Section 15126.6(d) states that the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the Project as proposed. CEQA does not require a comparison of Project alternatives to other alternatives. For example, the impacts that would occur under Aquatic Resources Avoidance Alternative were not compared to the impacts that would occur under the No Project (No Build) Alternative. Rather, the analysis evaluates impacts that would occur with the alternatives relative to the significant impacts identified for the Project. The analysis of alternatives considered in the Draft EIR focuses on the resource areas listed above at a level of detail that allows for comparison to the Project, consistent with CEQA Guidelines Section 15126.6(a) and 15126.6(d).

The selection of the environmentally superior alternative is based on the analysis as described above. In addition, Table 7-2 in Chapter 7, Alternatives Analysis, of the Draft EIR includes a summary comparison of the environmental impacts resulting from the considered alternatives and the Project.

Although the No Project (No Build) Alternative would be expected to generate the least amount of significant impacts, Section 15126.6(e)(2) of the CEQA Guidelines requires that an environmentally superior alternative be designated and states, "If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." Both the No Project (No Build) and No Project (Buildout Pursuant to General Plan) Alternatives are considered "no project" alternatives under CEQA. The No Project (Buildout Pursuant to General Plan) Alternative assumes that new development would not occur beyond what is planned for the site under current General Plan and zoning designations. The Alternative is a scenario where the Project would be developed as allowed by the current General Plan designation. Pursuant to CEQA Guidelines Section 15126.6(e)(3)(A), when the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the "no project" alternative will be the continuation of the existing plan, policy or operation into the future. Therefore, the No Project (Buildout Pursuant to General Plan) Alternative is considered a "no project" alternative.

Because the Aquatic Resource Avoidance Alternative would result in fewer impacts than the Project related to eight of the 10 issue areas, and would result in similar impacts as the Project for the remaining two issue areas for which project impacts were identified, the Aquatic Resource Avoidance Alternative would be considered the Environmentally Superior Alternative. Additional feasible alternatives that would meet the objectives of the Project were not identified, and, therefore, were not evaluated for consideration of being an environmentally superior alternative. A more detailed discussion regarding why the Aquatic Resources Avoidance Alternative was selected as the environmentally superior alternative is provided in Chapter 7, Alternatives Analysis, page 7-19, of the Draft EIR.

2.3 RESPONSES TO COMMENTS

Each bracketed comment letter is followed by numbered responses to each bracketed comment. The responses amplify or clarify information provided in the Draft EIR and/or refer the reader to the appropriate place in the document where the requested information can be found. Comments that are not directly related to environmental issues (e.g., opinions on the merits of the project that are unrelated to its environmental impacts) are either discussed or noted for the record. Where revisions to the Draft EIR text are required in response to the comments, such revisions are noted in the response to the comment, and are also listed in Chapter 3 of this Final EIR. All new text is shown as <u>double underlined</u> and deleted text is shown as ~~struck through~~.

Letter 1

[EXTERNAL EMAIL]

Dear Kyra Killingsworth:

The California Department of Fish and Wildlife (CDFW) received and reviewed the Notice of Availability of a DEIR from the City of Elk Grove for the Summer Villas Special Planning Area Project (Project) pursuant the California Environmental Quality Act (CEQA) statute and guidelines.[1] CDFW previously submitted comments in response to the Notice of Preparation of the DEIR on October 7, 2024.

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish, wildlife, native plants, and their habitat. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may need to exercise its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).)

1-1

CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (Fish & G. Code, § 1802.) Similarly for purposes of CEQA, CDFW provides, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources. CDFW may also act as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT DESCRIPTION SUMMARY

The Project site is located at 9350 Sheldon Road, Elk Grove, CA 95624 in Sacramento County.

Letter 1 Cont.

1-1 Cont.

The Project consists of the creation of the 116-acre Summer Villas Special Planning Area (SPA). The Summer Villas SPA project 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). The remaining 4.9 acres of the site would be dedicated to the Waterman Road and Sheldon Road right-of-way. In addition, subsequent potential development of the 116-acre site would include 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.

COMMENTS AND RECOMMENDATIONS

1-2

CDFW offers the comments and recommendations below to assist the City of Elk Grove in adequately identifying and, where appropriate, mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Based on the Project's avoidance of significant impacts on biological resources with implementation of mitigation measures, CDFW concludes that an Environmental Impact Report is appropriate for the Project.
CDFW is primarily concerned with the project impacts to burrowing owls (*Athene cunicularia*) which is a state candidate species for listing under CESA.

COMMENT 1: Mitigation for Significant Impacts to Burrowing Owls, Mitigation Measure(s) 4.3-7(c), pages 4.3-63 and 4.3-64

1-3

Issue: The DEIR states that if nesting burrowing owls are detected in the Project Area during preconstruction survey, then mitigation for permanent loss of foraging habitat will be done at a 1:1 ratio and be consistent with CDFW's *2012 Staff Report on Burrowing Owl Mitigation*. The mitigation proposed by the DEIR is only for the permanent loss of foraging habitat and does not take into account the permanent impacts to nesting, occupied and satellite burrows. The 1:1 mitigation ratio does not adequately encompass the compensation required to achieve at least a no net loss which is required by CEQA (Cal. Code Regs. Tit. 14, § 15065(b)(2)(C)). When taking into account the ecological value of the lost habitat, temporal loss, and the risk that the mitigation project could fail, the mitigation proposed in the DEIR does not reduce project impacts to a less-than-significant level.

In addition, burrowing owls are state candidate species for listing under CESA and as such, it is afforded full protection under the act. It is unlawful to take a State-listed endangered or threatened species (Fish & G. Code §2050 et seq.). Take is defined as "hunt, pursue, catch, capture or kill or attempt to hunt, pursue, catch, capture or kill" (Fish & G. Code §86). CESA take authorization, should be obtained if the proposed project cannot fully avoid take of burrowing owls. If the proposed Project will impact CESA listed species, early consultation is encouraged, as significant modification to the proposed Project and mitigation measures may be required in order to obtain an Incidental Take Permit (ITP). An ITP may only be obtained if the impacts of the authorized take of the species are minimized and fully mitigated and adequate funding has been ensured to implement the mitigation measures. CDFW may only issue an ITP if the CDFW determines that issuance of the permit does not jeopardize the continued existence of the species.



Letter 1 Cont.

1-3 Cont.

The DEIR does not include any mitigation for temporary impacts. Temporary impacts to the species may include temporary ground disturbance and vegetation removal that may render a nesting site (nesting burrow and satellite burrows) or foraging site unsustainable or unavailable depending on the time frame, resulting in reduced survival or abandonment. CESA requires project impacts to be fully mitigated, including any temporary impacts. Please note that mitigation measures that are adequate to reduce impacts to a less-than significant level to meet CEQA requirements may not be enough for the issuance of an ITP. To facilitate the issuance of an ITP, CDFW recommends the DEIR include details pertaining to the permanent protection and perpetual management of compensatory habitat necessary to fully mitigate project-related impacts, both permanent and temporary. The type and amount of mitigation should be based on factors including an assessment of the importance of that habitat in the Project Area, the extent to which covered activities will impact the habitat, and the estimate of the acreage required to provide for adequate compensation in coordination with CDFW. Due to the reasons stated above and the ongoing habitat loss and degradation of agricultural and other open lands from the rapid urbanization of farmland in the core areas of the Central Valley (Shuford, W. D., and Gardali, T., editors. 2008), a 1:1 mitigation ratio for the loss of foraging habitat will not mitigate project impacts to a level of less than significant.

1-4

Recommendation or Recommended Mitigation Measure: CDFW recommends the mitigation ratio for burrowing owl habitat impacts is a minimum of 3:1 to offset the permanent loss of nesting habitat and 2:1 to offset the permanent loss of foraging habitat. CDFW also recommends that the mitigation for temporary impacts is no less than 1:1 for burrowing owls and their habitat to reduce project impacts to a less-than-significant level. CDFW recommends that mitigation is in the form of purchasing suitable mitigation credits from a CDFW-approved conservation bank, habitat restoration/enhancement onsite or offsite, partnership with other agencies or non-profit groups on suitable restoration projects, or other biologically suitable mechanisms pre-approved by the Lead Agency.

1-5

ENVIRONMENTAL DATA

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

Letter 1 Cont.

FILING FEES

1-6 The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

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

1-7 CDFW appreciates the opportunity to comment on the DEIR for the Summer Villas Special Planning Area Project to assist the City of Elk Grove in identifying and mitigating Project impacts on biological resources. CDFW personnel are available for consultation regarding biological resources and strategies to minimize and/or mitigate impacts. Questions regarding this letter or further coordination should be directed to Harvey Tran, Senior Environmental Scientist (Specialist) at (916) 358-4035 or harvey.tran@wildlife.ca.gov.

REFERENCES

1-8 Shuford, W. D., and Gardali, T., editors. 2008. *California Bird Species of Special Concern: A ranked assessment of species, subspecies, and distinct populations of birds of immediate conservation concern in California*. Studies of Western Birds 1. Western Field Ornithologists, Camarillo, California, and California Department of Fish and Game, Sacramento.

Sincerely,

Harvey Tran
Senior Environmental Scientist (Specialist)
California Department of Fish and Wildlife
Region 2 - North Central Region
1701 Nimbus Road, Rancho Cordova, CA 95670
Habitat Conservation Program
(916) 358-4035
harvey.tran@wildlife.ca.gov

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

LETTER 1: CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE

Response to Comment 1-1

The comment provides a description of the Project and the role of the California Department of Fish and Wildlife (CDFW). The comment does not address the adequacy of the Draft EIR.

Response to Comment 1-2

The comment provides an overview of the agency's general concerns. Please see the responses to the commenter's more specific comments regarding burrowing owl in Responses to Comments 1-3 and 1-4.

Response to Comment 1-3

Please see revisions to Mitigation Measure 4.3-7(c) related to burrowing owl below in Response to Comment 1-4.

Response to Comment 1-4

The City has separately coordinated with CDFW in determining acceptable mitigation related to burrowing owl. As a result of such coordination, Mitigation Measure 4.3-7(c) on pages 4.3-63 and 4.3-67 in Chapter 4.3, Biological Resources, of the Draft EIR is hereby revised as follows:

4.3-7(c) *If nesting burrowing owls are found during the preconstruction survey required by Mitigation Measure 4.3-7(a) and impacts to such burrowing owls and associated burrows will be avoided pursuant to that measure (such as when burrows are located off-site or within areas of the site not proposed for development), mitigation for the permanent loss of burrowing owl foraging habitat (defined as all areas of suitable habitat within ~~250~~ 300 feet of the active burrow) shall be accomplished at a 1:1 ratio for the portion of the habitat within the development area of the Project and at a 0.5:1 ratio for portions of the foraging habitat that lie outside of the development area of the Project (such as Open Space area or an adjacent parcel), all prior to the commencement of ground disturbance activities. ~~prior to the approval of any future Tentative Maps.~~ The mitigation provided shall be consistent with recommendations in the CDFW Staff Report on Burrowing Owl Mitigation and may be accomplished within the Swainson's hawk foraging habitat mitigation area for the Project if burrowing owls have been documented using the area, or if the qualified biologist, the City, and CDFW collectively determine that the mitigation strategy is suitable for both species.*

If nesting burrowing owls are found, during the preconstruction survey required by Mitigation Measure 4.3-7(a), that cannot be avoided or adequately protected with a no-disturbance buffer, an Incidental Take Permit (ITP) shall be obtained from CDFW in order to evict owls from the burrow(s). The ITP process shall include the preparation of an application which shall include, but not be limited to: a description of the project activity, an analysis of potential take of burrowing owl, an analysis of the impact of the proposed take on burrowing owl, an analysis of if the issuance of an ITP would jeopardize the continued existence of the species, proposed mitigation measures, and a monitoring plan to assess the effectiveness of the mitigation measures. Burrowing owls shall not be excluded from occupied burrows until the ITP is approved by CDFW.

If burrowing owls are evicted from burrows or occupied burrows are destroyed by project activities, the Project proponent shall mitigate for the permanent loss of nesting and foraging habitat (defined as all areas of suitable habitat within 300 feet of the active burrow at a ratio of 3:1. The Project proponent shall provide mitigation in the form of purchasing suitable mitigation credits from a CDFW-approved conservation bank, habitat restoration/enhancement on-site or off-site partnership with other agencies or non-profit groups on suitable restoration projects or other biologically suitable mechanisms pre-approved by CDFW.

In addition, if burrowing owls are evicted from burrows or occupied burrows are destroyed by Project activities, the Project proponent will mitigate for all temporary impacts (may include, but not limited to, temporary ground disturbance and vegetation removal before, or during construction) to burrowing owls and their habitats at a ratio of 0.5:1 to reduce project impacts to a less than significant level. The Project proponent shall provide mitigation in the form of purchasing suitable mitigation credits from a CDFW-approved conservation bank, habitat restoration/enhancement onsite or offsite, partnership with other agencies or non-profit groups on suitable restoration projects, or other biologically suitable mechanisms pre-approved by CDFW.

Response to Comment 1-5

The comment does not address the adequacy of the Draft EIR. The only special-status species observed on-site during the protocol-level surveys conducted for the Project is legenere, which was observed on-site on May 9, 2024. The occurrence (Occurrence #30) has been submitted to the California Natural Diversity Database (CNDDB) and was last updated on October 7, 2025.

Response to Comment 1-6

The comment does not address the adequacy of the Draft EIR. The comment has been noted for the record.

Response to Comment 1-7

The comment does not address the adequacy of the Draft EIR. The comment has been noted for the record.

Response to Comment 1-8

The comment does not address the adequacy of the Draft EIR.

Letter 2

SACRAMENTO AREA SEWER DISTRICT
SERVING YOU 24/7

Administrative Office
10060 Goethe Road
Sacramento, CA 95827
Tel 916.876.6000

EchoWater Facility
8521 Laguna Station Road
Elk Grove, CA 95758
Tel 916.875.9000

November 24, 2025

Kyra Killingsworth
Development Services Department
City of Elk Grove
8401 Laguna Palms Way
Elk Grove, CA 95758

Subject: **NOTICE OF AVAILABILITY (NOA) FOR AN ENVIRONMENTAL IMPACT REPORT (EIR) FOR SUMMER VILLAS SPECIAL PLANNING AREA PROJECT**
APN: **127-0010-077**
File No: **NO. 2024080407**

Dear Ms. Killingsworth,

The Sacramento Area Sewer District (SacSewer) has reviewed the subject document.

The Summer Villas Special Planning Area Project is located at the southeast of the intersection of Sheldon Road and Waterman Road, in the northeastern portion of the City of Elk Grove.

The proposed project consists of a General Plan/Rural Area Community Plan Amendment to allow for the creation of the 115.9-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) and the remaining five acres of the site are dedicated to the Waterman Road and Sheldon Road right-of-way (ROW). The SPA does not entitle any specific development proposals. Rather, the SPA adopts site-specific zoning, development standards, and criteria for future development proposals within the site. The subsequent potential development of the 115.9-acresite includes a maximum of 499 age-restricted (55+) active adult single residential unit homes.

2-1

Note: Effective January 1, 2024, the Sacramento Regional County Sanitation District and the Sacramento Area Sewer District merged into one district called the Sacramento Area Sewer District, or SacSewer for short.

SacSewer is not a land-use authority and plans and designs its sewer systems using information from land-use authorities. SacSewer bases the projects identified within its planning documents on growth projections provided by these land-use authorities.

In March 2021, the SacSewer Board of Directors approved the most current SacSewer planning document, the 2020 System Capacity Plan Update (SCP). In February 2013, the SacSewer Board of Directors adopted the Interceptor Sequencing Study (ISS). The SCP and ISS are on the SacSewer website at System Capacity Plans - Sacramento Area Sewer District (sacsewer.com).

Letter 2 Cont.

Ms. Kyra Killingsworth
NO. 2024080407
November 24, 2025

2-1 Cont.

Customers receiving service from SacSewer are responsible for rates and fees outlined within the latest SacSewer ordinance. Fees for connecting to the sewer system recover the capital investment of sewer and treatment facilities that serve new customers. SacSewer does not guarantee sewer service or system capacity to the property until the property obtains proper permits to connect to the system and pays all facility impact (capacity) fees. The SacSewer ordinances are on the SacSewer website at Ordinances - Sacramento Area Sewer District (sacsewer.com).

SacSewer has the following comments on the Environmental Impact Report:

Pg. 3-14, Utilities

2-2

- The report states:

  As described in SacSewer 2020, 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 with sufficient depth and/or capacity to serve the Project is not available in proximity to the site. .

  The Rural Residential Sheldon Area was not included in the 2020 SCP because the City indicated that the area is not planned to receive sewer service. The SCP did not evaluate the feasibility of sewer service by either gravity or pump stations. Provide additional clarification for why gravity service is not feasible. Also discuss the wastewater needs of the rest of the area within the Rural Residental Sheldon Area, including if the project area will be removed from Rurual Residential Sheldon Area prior to sewer service and if any other areas will be removed from Rural Residential Sheldon Area. If additional offsite areas are planned for removal from Rural Residential Sheldon Area, the project may be required to address offsite flows.

2-3

- The report states:

  Figure 3-8 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.

  Address if the on-site sewer pipeline network and onsite pump/lift station are public or private. SacSewer requires public sewer main lines to be placed in the righ-of-way when possible. Also note that collector-sized sewer facilities (including pump stations and forced mained), defined as facilities conveying less than 1 MGD of flow, are not reimbursable.

2-4

- Discuss the wastewater needs of the rest of the area within the Rural Residental Sheldon Area, including if the project area will be removed from Rurual Residential Sheldon Area prior to sewer service and if any other areas will be removed from Rural Residential Sheldon Area. If additional offsite areas are planned for removal from Rural Residential Sheldon Area, the project may be required to address offsite flows.

Letter 2 Cont.

Ms. Kyra Killingsworth
NO. 2024080407
November 24, 2025

Pg. 4.10-7, Wastewater Conveyance and Treatment

2-5

- Update all references of "Sacramento Regional Wastewater Treatment Plant" or "SRWTP" to its current name, "EchoWater Resource Recovery Facility" or "EchoWater Facility." Also update all reference of "Sacramento Regional County Sanitation District" to "Sacramento Area Sewer District" or "SacSewer," except for references of the entity specific to prior to the merger. Ensure this is consistent throughout the report.
- Correct the citation(s) used in the "Wastewater Treatment" section. The section refers to the "SRWTP 2020 Master Plan," which is shown in the footnotes as the SacSewer 2020 System Capcity Plan. The System Capacity Plan does not include information discussed in this section. Provide the correct citation(s) for where this information is obtained and correct or update information as needed.

Pg. 4.10-33, Wastewater Conveyance and Treatment

2-6

- Any areas within project site that will be counted as 0 ESD/ac (ex. drainage, wetland, etc.) must have a dedicated easement in perpetuity.

If you have any questions regarding these comments, please call me at (916) 875-2917.

Sincerely,

Manjot Dhugga

Manjot Dhugga
SacSewer Development Services

LETTER 2: SACRAMENTO AREA SEWER DISTRICT

Response to Comment 2-1

The comment provides background information on the Project and the Sacramento Area Sewer District (SacSewer), and does not specifically address the adequacy of the Draft EIR.

Response to Comment 2-2

Gravity sewer service is not feasible to the site because, as discussed within the Sewer Flow Assessment prepared for the Project (see Appendix M to the Draft EIR), SacSewer was previously informed by the City of Elk Grove that the Rural Residential Sheldon Area is not planned to be served by public sewers. Subsequently, the Sewer Flow Assessment concluded that existing backbone gravity sewer infrastructure with sufficient depth and/or capacity to serve the Project is not located within the site vicinity.

Wood Rodgers engaged with SacSewer on the closest available gravity line with sufficient capacity to support the proposed project. This tie in location was summarized in a letter from SacSewer on March 19, 2025. The site is split by a tributary to Laguna Creek and the direct serviceability of the site by a gravity sewer connection is controlled by the flow line of this tributary. Based on the inverts published in the March 19 SacSewer Memo, it is unfeasible to extend gravity sewer below the existing creek tributary. As such, a small lift station and force main was identified as the most cost effective alternative for sewer service to the site. Wood Rodgers is unaware of any other development updates within the Rural Elk Grove area and, thus, the Draft EIR analysis was limited only to the Project. All potential physical environmental impacts that could result from development of the Project, including the proposed wastewater conveyance infrastructure, have been evaluated throughout the technical chapters of the Draft EIR.

Additional changes to the Rural Residential Sheldon Area and associated land use designations are not proposed as part of the Project. If such changes do occur in the future, additional CEQA review associated with that project would be required. In addition, a discussion of potential cumulative impacts related to sewer service is included under Impact 4.10-11 of the Draft EIR.

Response to Comment 2-3

As noted on page 3-16 of the Draft EIR, the off-site four- to six-inch diameter force main required to support the Project would be installed within the public right-of-way of Sheldon Road and Elk Grove Florin Road. The project applicant understands that the proposed improvements (on site network, lift station, force main) are not reimbursable due to the total flows being less than one million gallons per day (mgd). The break between public and private sewer services has not been discussed with SacSewer to date. However, this effort is typically vetted with SacSewer staff later in the planning process (during preparation of the Tentative Map) and formalized in the assigned conditions of approval for the Project. That said, because the Project would be a private, gated community, the on-site gravity network would be a private system. The public or private nature of the lift station and force main would be confirmed during the Tentative Map process.

Response to Comment 2-4

Please see Response to Comment 2-2 above.

Response to Comment 2-5

The requested revisions would not affect the conclusions of the Draft EIR. Please see Master Response 1. The wastewater conveyance and treatment section of the Draft EIR, which is contained on page 4.10-7, is hereby revised as follows:

> SacSewer trunk sewer pipes transport the collected wastewater flows to the Regional San interceptor system. According to the City's General Plan EIR, an existing City trunk line extends southeast from the ~~Sacramento Regional Wastewater Treatment Plant (SRWTP)~~ EchoWater Resource Recovery Facility (EchoWater Facility) to Laguna Boulevard, then parallel to SR 99 along East Stockton Boulevard, extending close to the southern City boundary.
>
> ### Wastewater Treatment
>
> The ~~SRWTP~~ EchoWater Facility is located on 900 acres of a 3,550-acre site between I-5 and Franklin Boulevard, north of Laguna Boulevard. The remaining 2,650 acres serve as a buffer between the ~~SRWTP~~ EchoWater Facility and nearby residential areas. Wastewater is treated by accelerated physical and natural biological processes before being discharged to the Sacramento River.
>
> As discussed in the City's General Plan EIR, ~~The~~ the SRWTP 2020 Master Plan provides a phased program of recommended wastewater treatment facilities and management programs to accommodate planned growth and to meet existing and anticipated regulatory requirements in the SacSewer service area.[2] The Master Plan uses SACOG population projections multiplied by per capita flow and load values to determine future facility needs. The ~~SRWTP's~~ EchoWater Facility's capacity is currently limited to an equivalent 207 million gallons per day (mgd) average dry weather flow (ADWF) and the ~~SRWTP~~ EchoWater Facility has been planned to accommodate up to 350 mgd ADWF. In addition, SacSewer has prepared a long-range master plan for the large-diameter interceptors that transport wastewater to the ~~SRWTP~~ EchoWater Facility, including interceptor upgrades/expansions to accommodate anticipated growth through 2035.

References to the SRWTP are made in several locations throughout the Draft EIR, including throughout Chapter 4.10 and within Chapter 6. The revision presented above is hereby applied to all such similar discussions throughout the Draft EIR.

It should be noted that the only instance of "Sacramento Regional County Sanitation District" in the Draft EIR is on page 4.10-7 within a description of the previous iterations of the district. Therefore, consistent with the comment, revisions are not necessary.

Response to Comment 2-6

Please see Master Response 1. The comment is a standard comment from SacSewer, and the request would be addressed as part of future subsequent entitlements for specific development applications. City staff confirmed with SacSewer that there are no requests for modifications to the Special Planning Area (SPA) document to address this comment.

---

[2] ~~Sacramento Area Sewer District. *System Capacity Plan 2020 Update*. December 2020.~~ City of Elk Grove. *General Plan Update Draft Environmental Impact Report* [pg. 5.12-27]. February 2019.

Letter 3

SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

November 24, 2025 AQMD No: SAC202403317

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

Re: Summer Villas Special Planning Area – Draft Environmental Impact Report (SCH# 2024080407)

Dear Kyra,

Thank you for providing the Sacramento Metropolitan Air Quality Management District (Sac Metro Air District) with the opportunity to review the Draft Environmental Impact Report for the Summer Villas Special Planning Area Project, hereafter referred to as "Project". The proposed Project is located south of Sheldon Road and west of Waterman Road in the City of Elk Grove (City) and is currently zoned Rural Residential (RR) in the City's General Plan and Rural Area Community Plan (RACP).

3-1 The Project requests a General Plan/RACP Amendment from RR to Low Density Residential (LDR) and Parks and Open Space (P/OS) for the development of 115.9-acre which is to be subdivided into three distinct zones: 1) Active Adult Neighborhood (71.3-acres) consisting of no more than 499 single-unit residences; 2) Laguna Creek Open Space (20.3 acres); and 3) Waterman Recreational Open Space (19.4 acres). In addition, 4.9-acres of the site will be dedicated to Waterman Road and Sheldon Road right-of-way.

Please accept the following comments for the Project's Draft Environmental Impact Report with considerations for air quality and public health.

4.2 Air Quality, Greenhouse Gas Emissions (GHG), and Energy

This section includes a discussion on Impacts and Mitigation Measures for the proposed project-specific impacts related to air quality and GHG emissions.

3-2
- **Page 4.2-41**: It is noted that under 4.2-1 there are a number of enforceable Sac Metro Air District rules and regulations that are listed and require the Project to comply with permitting and overall compliance. District staff requires that the list of Rules (i.e. Rule 403, 404, 407, 442,

777 12th Street, Ste. 300 • Sacramento, CA 95814
Tel: 279-207-1122 • Toll Free: 800-880-9025
AirQuality.org

Letter 3 Cont.

453...) are included as a *Mitigation Measure* in **Table 2-1 Summary of Impacts and Mitigation Measures** next to the respective Impact discussion.

- **Sac Metro Air District's Best Management Practices** for fugitive dust control are also listed under this section and should also be included as a Mitigation Measure in **Table 2-1 Summary of Impacts and Mitigation Measures**.

3-2 Cont.

If you have any questions, please contact me at ctran@airquality.org or (916) 704-0550 for further clarification.

3-3

Sincerely,

Carolyn Tran
Assistant Air Quality Planner/Analyst

c: Richard Muzzy, CEQA and Land Use Program Supervisor

LETTER 3: SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

Response to Comment 3-1

The comment provides a description of the Project and is introductory to the remainder of the comment letter. The comment does not address the adequacy of the Draft EIR.

Response to Comment 3-2

Because Project construction emissions were quantified as shown in Table 4.2-7 of the Draft EIR and were determined to be below the applicable Sacramento Metropolitan Air Quality Management District (SMAQMD) thresholds of significance, a nexus to require implementation of the SMAQMD rules and regulations and best management practices (BMPs) for dust control as mitigation does not exist. Implementation of the SMAQMD rules and regulations and BMPs for dust control is not required in order to reduce emissions to below the applicable thresholds of significance. Accordingly, inclusion of the SMAQMD rules and regulations and BMPs for dust control as mitigation in the Draft EIR is not warranted pursuant to CEQA. As discussed on page 4.2-41 of the Draft EIR, the City would require compliance with SMAQMD rules and regulations as part of conditions of approval for any future tentative subdivision maps. In addition, as discussed on page 4.2-42 of the Draft EIR, compliance with the SMAQMD BMPs for dust control is required per Rule 403, and the City would enforce compliance with Rule 403 as a condition of approval of the Project. Thus, Project construction will include compliance with all applicable SMAQMD rules and regulations and BMPs for dust control.

Response to Comment 3-3

The comment is a conclusion statement and does not address the adequacy of the Draft EIR.

Letter 4

From: Ziegler II, Leslie (Alan) (CONTR)
To: Kyra Killingsworth
Subject: RE: [EXTERNAL] RE: Summer Villas Project Plans
Date: Tuesday, October 14, 2025 9:01:33 AM
Attachments: image001.png
image002.png

[EXTERNAL EMAIL]

Hi Kyra,
Thanks for the info. We'll keep an eye out for future plans. The open space with a trail would require a license agreement from WAPA.

Thanks,

AL Ziegler | Program Support Specialist
Wyandotte Technologies On Contract to U.S. Department of Energy
Western Area Power Administration | Sierra Nevada Region
(c) 916.671.2188 | leziegler[at]wapa.gov

Note: I am not a government employee and have no legal authority to obligate any federal, state or local government to perform any action or payment.

From: Kyra Killingsworth <kkillingsworth@elkgrove.gov>
Sent: Tuesday, October 14, 2025 8:43 AM
To: Ziegler II, Leslie (Alan) (CONTR) <LEZiegler@WAPA.GOV>
Subject: RE: [EXTERNAL] RE: Summer Villas Project Plans

EXTERNAL E-MAIL: Before you click a link or open an attachment... STOP and THINK. Forward any suspicious e-mail to spam@wapa.gov, or call WITCC at (720) 962-7111.

There are no plans at this time for that area. The future plans include an open space area with a trail. The Applicant will need to come back through the process for tentative subdivision maps.

Thanks,

4-1

Letter 4 Cont.

Kyra

Green tree City of Elk Grove

Kyra Killingsworth
Senior Planner
Community Development Department
Development Services Group- Planning

Elkgrove.gov

From: Ziegler II, Leslie (Alan) (CONTR) <LEZiegler@WAPA.GOV>
Sent: Tuesday, October 14, 2025 6:38 AM
To: Kyra Killingsworth <kkillingsworth@elkgrove.gov>
Subject: RE: [EXTERNAL] RE: Summer Villas Project Plans

You don't often get email from lezlegler@wapa.gov. Learn why this is important

[EXTERNAL EMAIL]

4-1 Cont.

Hi Kyra,
I attached another map showing the WAPA easement outlined by green lines.

Thanks,

AL Ziegler | Program Support Specialist
Wyandotte Technologies On Contract to U.S. Department of Energy
Western Area Power Administration | Sierra Nevada Region
(c) 916.671.2188 | leziegler[at]wapa.gov

Note: I am not a government employee and have no legal authority to obligate any federal, state or local government to perform any action or payment.

From: Kyra Killingsworth <kkillingsworth@elkgrove.gov>
Sent: Friday, October 10, 2025 3:32 PM

Letter 4 Cont.

To: Ziegler II, Leslie (Alan) (CONTR) <LEZiegler@WAPA.GOV>
Subject: [EXTERNAL] RE: Summer Villas Project Plans

EXTERNAL E-MAIL: Before you click a link or open an attachment... STOP and THINK. Forward any suspicious e-mail to spam@wapa.gov, or call WITCC at (720) 962-7111.

Hi Al-

I don't see the shaded area in blue on the map you provided. I saw a red/pink line, is that what you are referencing?

Thanks,
Kyra

Green tree City of Elk Grove

Kyra Killingsworth
Senior Planner
Community Development Department
Development Services Group- Planning

Elkgrove.gov

From: Ziegler II, Leslie (Alan) (CONTR) <LEZiegler@WAPA.GOV>
Sent: Friday, October 10, 2025 2:16 PM
To: Kyra Killingsworth <kkillingsworth@elkgrove.gov>
Subject: Summer Villas Project Plans

You don't often get email from lezlegler@wapa.gov. Learn why this is important
[EXTERNAL EMAIL]

Hi Kyra,
Do you have any plans for the WAPA easement running through the current Summer Villas Project? We will need to get a License Agreement in place for anything involving the WAPA easement. (I've attached a map with the easement shaded in blue)

Thanks,

AL Ziegler | Program Support Specialist
Wyandotte Technologies On Contract to U.S. Department of Energy

4-1 Cont.

Letter 4 Cont.

4-1 Cont.

Western Area Power Administration | Sierra Nevada Region
(c) 916.671.2188 | leziegler[at]wapa.gov

Note: I am not a government employee and have no legal authority to obligate any federal, state or local government to perform any action or payment.

By sending us an email (electronic mail message) or filling out a web form, you are sending us personal information (i.e. your name, address, email address or other information). We store this information in order to respond to or process your request or otherwise resolve the subject matter of your submission.

Certain information that you provide us is subject to disclosure under the California Public Records Act or other legal requirements. This means that if it is specifically requested by a member of the public, we are required to provide the information to the person requesting it. We may share personally identifying information with other City of Elk Grove departments or agencies in order to respond to your request. In some circumstances we also may be required by law to disclose information in accordance with the California Public Records Act or other legal requirements.

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Letter 4 Cont.

4-1 Cont.

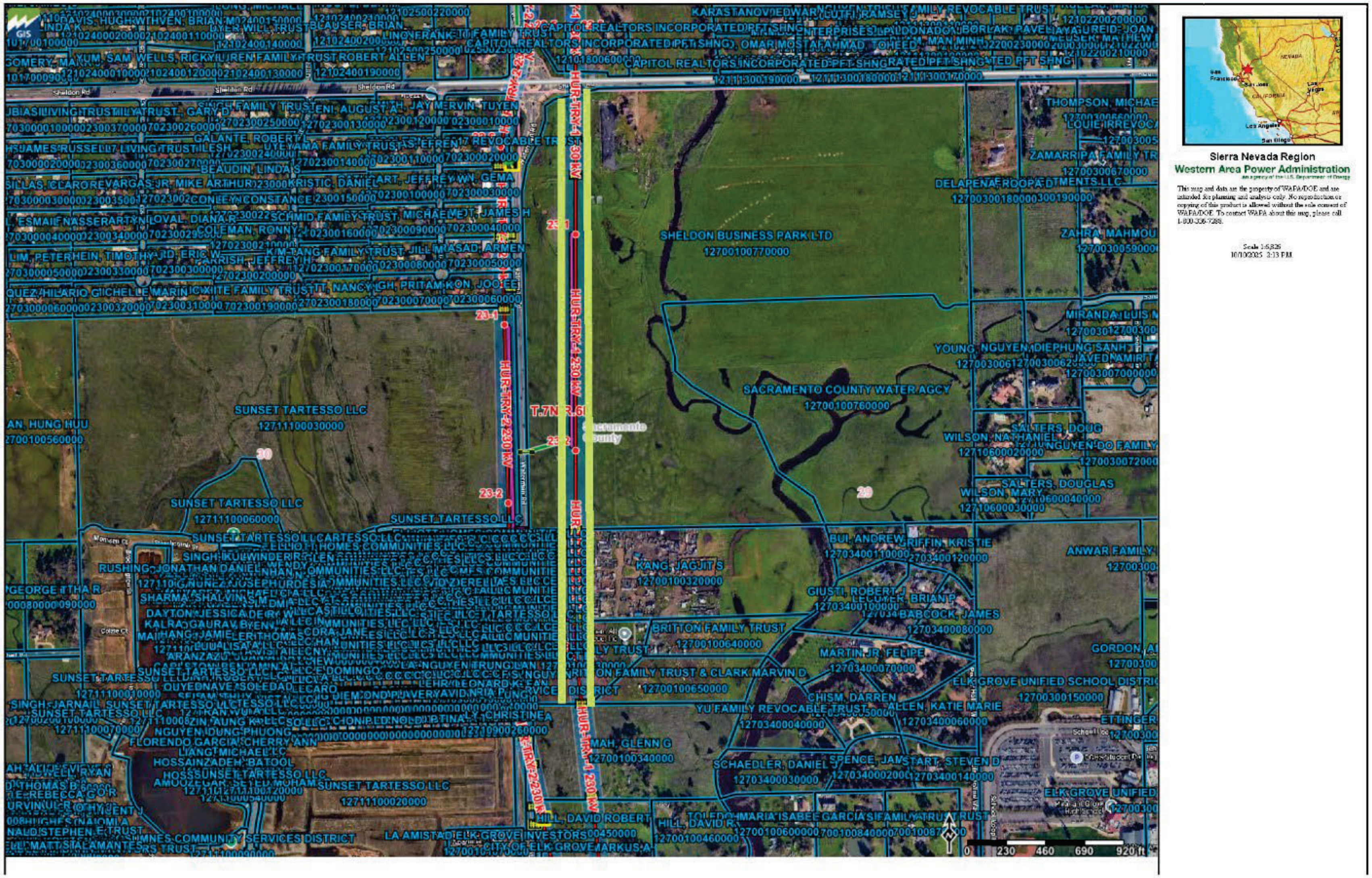


*Figure not OCR Compatible.

Letter 4 Cont.

4-1 Cont.

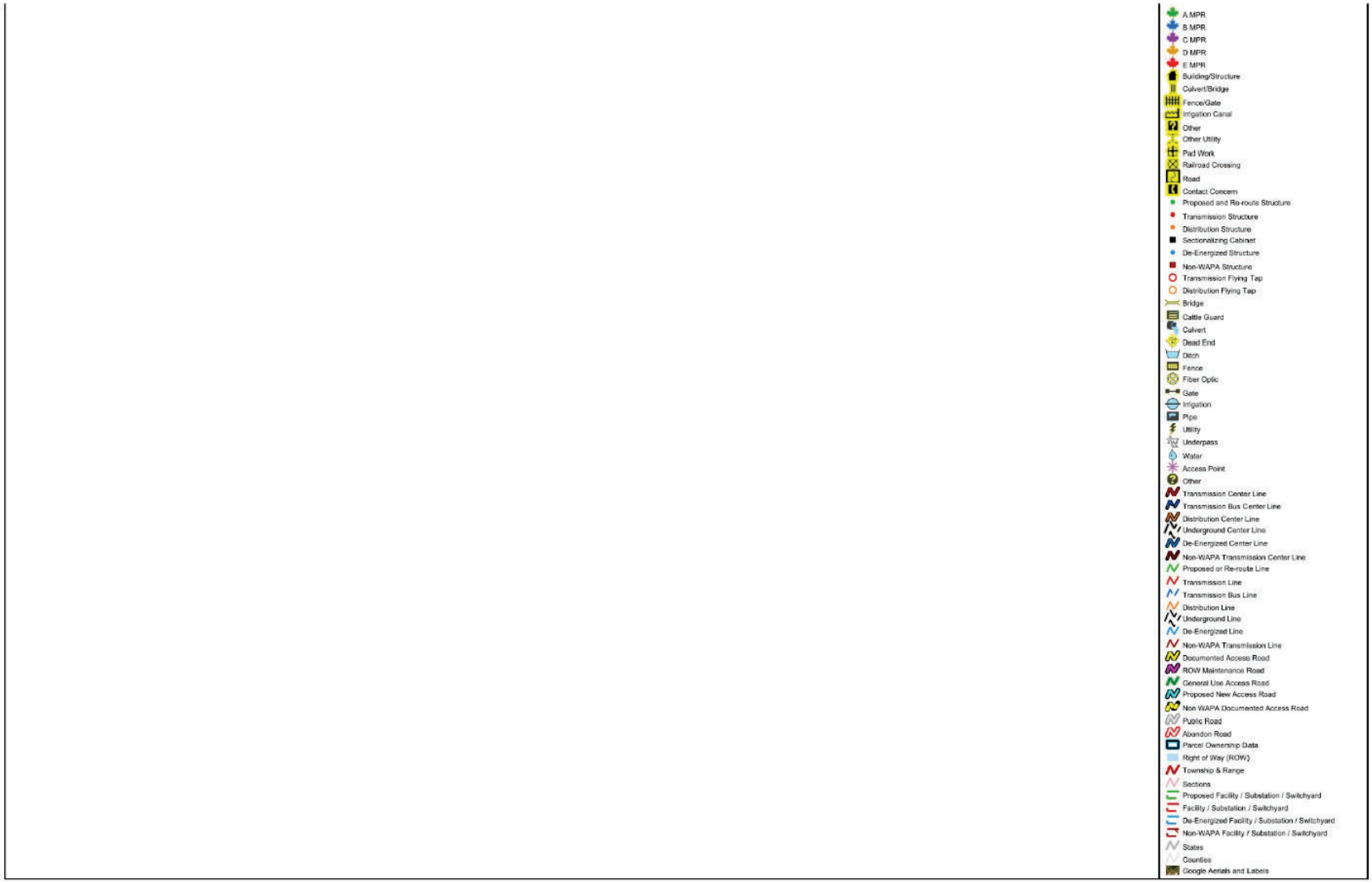


*Figure not OCR Compatible.

Letter 4 Cont.

4-1 Cont.

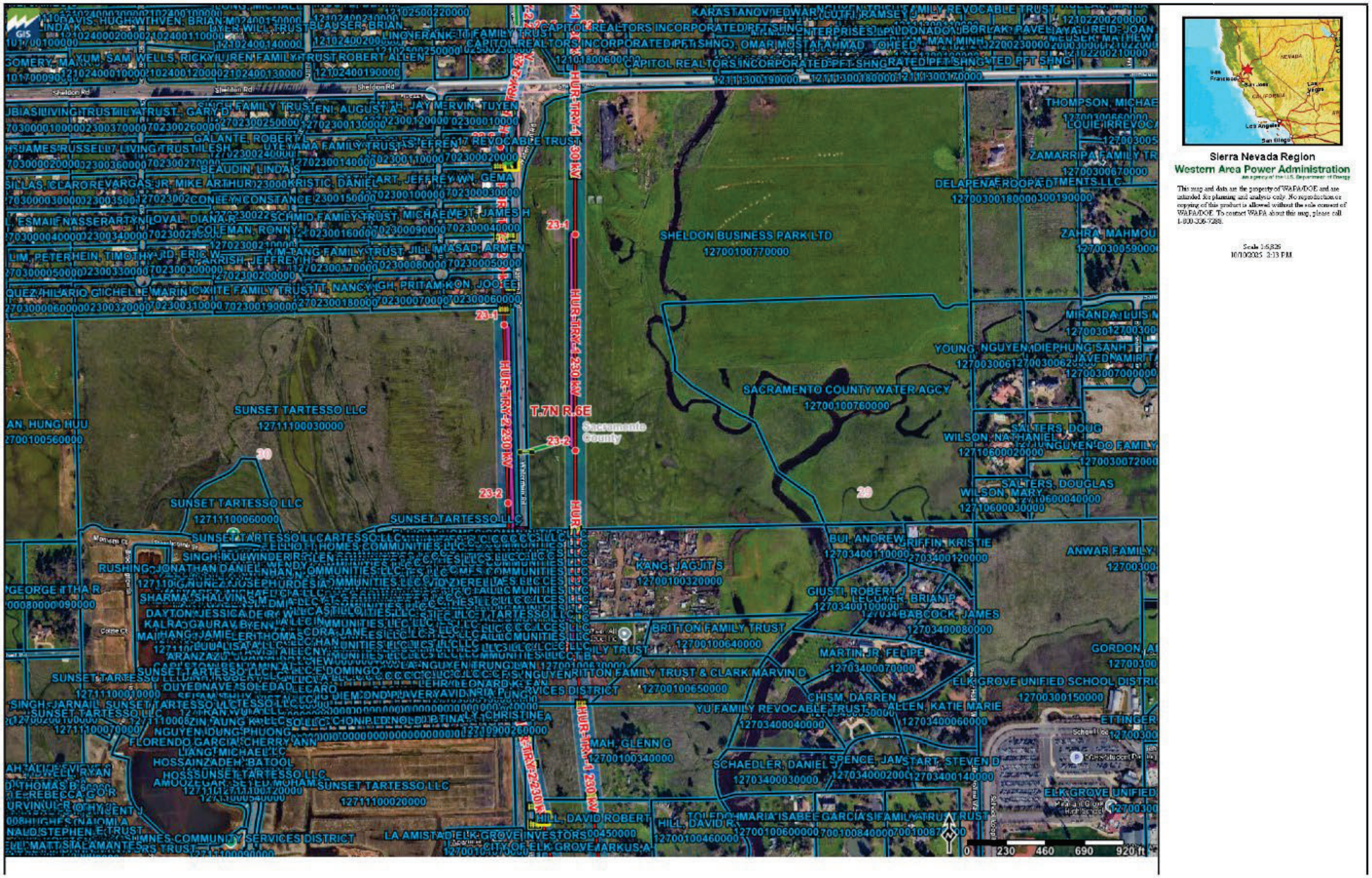


*Figure not OCR Compatible.

Letter 4 Cont.

4-1 Cont.



*Figure not OCR Compatible.

LETTER 4: U.S. DEPARTMENT OF ENERGY WESTERN AREA POWER ADMINISTRATION

Response to Comment 4-1

Please see Master Response 1. The comment has been noted for the record. Future tentative subdivision maps will be required to detail any plans involving the Western Area Power Administration easement on the site.

Letter 5

Project Title:
Summer Villas Special Planning Area Project

Written Comments to the Draft EIR

Hand-delivered to Lead Agency:
City of Elk Grove
Attn: Kyra Killingsworth, Senior Planner

Opening Statement

The long-time and new residents of the rural area, joined with other concerned residents of Elk Grove, oppose the proposed Summer Villa project because it threatens the character and sustainability of our rural community, placing an undue burden on our infrastructure through increased traffic and strained services, while also causing irreversible environmental damage by destroying sensitive habitats and open space.

5-1

Instead of this large-scale development, we urge the existing General Plan to remain intact. We must continue to respect the rural nature of Elk Grove.

Aesthetics

The proposed project would substantially alter the existing landscape characteristics, and the visual impacts would greatly decrease the aesthetic and property values of the surrounding neighborhoods.

5-2

These increased uses will contribute to impacts on visual resources and contribute to nighttime lighting and daytime glare.

The large area of asphalt streets will diminish the rural character. This will fundamentally change the landscape, environment, and lifestyle associated with our current rural settings.

Letter 5 Cont.

5-2 Cont. Why were these critical concerns glossed over in the Draft EIR?

Air Quality

The pollution potential from the proposed Summer Villas project to rural Elk Grove is very high and will increase regional air emissions well beyond a significant threshold and the cumulative impact must be avoided. 5-3

Additionally, the proposed Summer Villas project in the rural area is likely to decrease the air quality in the area.

Automobile traffic, diesel truck trips, and pollutants need to be addressed.

Automobile Traffic

Project traffic will increase concentrations of carbon monoxide along streets providing access to the project. Carbon monoxide is a local pollutant (i.e., high concentrations are normally only found very near sources). The major source of carbon monoxide, a colorless, odorless, poisonous gas, is automobile traffic. Elevated concentrations, therefore, are usually only found near areas of high traffic volume and congestion. 5-4

Traffic from the proposed project will result in a significant increase in carbon monoxide concentrations.

Diesel Truck Trips

The proposed project will result in a significant increase in diesel trucks on Sheldon Road. Health risks associated with this increase will have a significant impact. 5-5

Health Effects of Pollutants

The primary air quality problems in the Sacramento Valley are ozone and particulate matter. Carbon monoxide has been a problem in the past within larger cities such as Fresno, Bakersfield, Modesto and Stockton. 5-6

- 2 -

Letter 5 Cont.

5-6 Cont.

The health effects of the following important pollutants should be thoroughly addressed in the Draft EIR:

- Ozone
- Suspended Particulate
- Carbon Monoxide
- Toxic Air Contaminants
- Sensitive Receptors
- Attainment Status
  - Federal
  - State
- Regional Air Quality Planning
- Standards of Significance
- Construction-related Air Impacts
- Impacts from Carbon Monoxide
- Impacts from Diesel Truck Trips
- Operation-Related Impacts from Emissions of Ozone Precursors and PM10

Biological Resources

5-7

The importance of the potential impacts on the biological and wetland resources of the proposed Summer Villas project are considerable.

Adverse effects of biological resources from the proposed Summer Villas project primarily stem from habitat disruption bringing humans and wildlife into closer contact, as well as potential issues with water quality and indoor air quality.

California Environmental Quality Act

5-8

The California Environmental Quality Act allows several approaches to large and complex projects. The fundamental characteristic of the approach to CEQA compliance involves the assessment of "big picture" aspects such as the broad policy decisions; the cumulative

Letter 5 Cont.

5-8 Cont. effects of the project added to other past, present and expected future projects; and any growth-inducing effects of the project.

5-9 Potential environmental effects of the proposed Summer Villas components that have not undergone substantial review.

5-10 The proposed Summer Villas project will negatively impact the rural area's environment through habitat destruction and biodiversity loss, increased air and water pollution from construction and traffic, and altered water cycles due to increased impervious surfaces. It will also strain water resources, lead to soil degradation, and contribute to habitat fragmentation. These issues were not adequately addressed.

Cultural Resources

The proposed Summer Villas site will cause a substantial adverse change in the significance of a historical resource.

A "substantial adverse change" means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource is materially impaired.

5-11 The rural area is unique and distinctive to the city of Elk Grove, and it meets the description of being "significant in the architectural, agriculture, and educational annals of California" and should be considered a historical resource.

The rural area of Elk Grove is culturally significant, and public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

Therefore, all items under Cultural Resources must be categorized as having "potentially significant impacts."

Letter 5 Cont.

5-11 Cont. Elk Grove's rural community maintains a close relationship with nature and the land, which provides a unique lifestyle and fosters a deeper appreciation for natural systems.

Geology and Soils

The potential geological hazards require that specific geological and soils studies be part of the process. This analysis must identify on-site geological studies, determine risk potential and provide mitigation measures for all pertinent geological studies.

The preparation of a comprehensive soils report will identify soil constraints, groundwater elevations, grading recommendations and more must also be required.

5-12 Specific policies regarding safety and management of hydrology and water quality must be identified. Also, potential adverse impacts of geological and seismic hazards must be mitigated.

A study of the soils must be completed on the site to ascertain if the soil has a high shrink/swell potential, resulting in differential settlement as highly expansive soils should be removed. Also included must be a study on surface water control and specialized foundation systems.

Other areas to be completely studied should include:

- Erosion
- Drainage
- Mineral Resources
- Hydrogeology

Hazards and Hazardous Materials

5-13 The protection of the public and environment from exposure to hazardous material and hazardous waste and the potential risk of such materials in proximity to the proposed site will adversely affect the quality of life the residents in the surrounding rural neighborhoods.

- 5 -

Letter 5 Cont.

Problems related to hazardous materials include potential water and soil contamination; health hazards are generated from these materials and improper disposal of these materials by the proposed Summer Villas project are of great concern to the rural residents of Elk Grove.

The proposed project and the impact of hazardous substances of petroleum products will adversely affect property use and/or value of surrounding residences.

5-13 Cont.

A review of the land-use history must be made for evidence of the use, storage, and/or disposal of hazardous substances, and a view of available regulatory information. The property must be evaluated for hazardous materials storage, surficial staining or discoloration, debris, stressed vegetation, or other conditions that may be indicative of potential sources of contamination.

Will the proposed site include the use of hazardous materials in both the construction and operational phases of the development? If yes, would the construction phase and site preparation, construction equipment and other activities involve the transport and use of hazardous materials.

Hydrology, Groundwater and Water Quality

The increase in impervious areas caused by the proposed Summer Villas project will cause an increase in the type and quality of pollutants into storm water runoff.

5-14

The potential pollutants associated not only with the construction activities, but also with the operation of the proposed project include sediment, nutrients, oil and grease, metals, bacteria and viruses, organics, pesticides, floatables, toxics and pH affecting pollutants.

Additionally, when the site is disturbed by construction activity, there will be impact for pollutants to discharge from the site into downstream receiving waters.

Letter 5 Cont.

5-14 Cont. Adjacent wells and existing properties in the rural area will receive substantial discharge from the site into underground water tables.

For the purposes of the Draft EIR, the following will result from implementation of the proposed project including:

1. A substantial increase in surface runoff that requires new drainage facilities or taxes the capacity of existing drainage facilities;
2. Potentially result in the degradation of existing surface water resources; or,

5-15

3. Result in the contamination of groundwater resources in the project area;
4. Violate any water quality standards of waste discharge requirements;
5. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level.

Land Use/Planning

5-16 A large housing project in the rural area will lead to significant land use changes, such as the loss of agricultural land and natural habitats, increased infrastructure demands, and the potential for urban sprawl.

Elk Grove's rural area must remain zoned AR2.

Mandatory Findings of Significance

The Draft EIR omits the long-term consequences of the project and comprehensively ignores the permanent negative impact.

5-17 Additionally, the transitory traffic was not addressed in Draft EIR and will have a significant impact on the surrounding residences causing further devastation to the quality of life and security of the residents.

Letter 5 Cont.

5-17 Cont.

The proposed project will adversely affect all aspects of environment and economic factors not fully addressed in the Draft EIR.

The Elk Grove Planning Commission must deny this project site in the best interests of the city and residents of Elk Grove.

Noise

5-18

As an abutter of the proposed Summer Villas project, there are significant concerns about the noise. The amount of unwanted noise will assuredly affect the quality of lives and health of the many families residing in the immediate rural area.

The noise impacts associated with construction need also to be taken into consideration. Noise is a matter of health in this instance and must be evaluated by an expert in the field.

Public Services

Elk Grove Police Department

5-19

The proposed Summer Villas project site will result in the Elk Grove Police Department's inability to maintain acceptable service ratios, response times or other levels of service impairing the department's ability to respond to calls and ensure public safety.

Increased traffic will pose a threat to children. Given the recent fatal accidents at Sheldon and Waterman Roads, children, staying with their grandparents, riding their bicycles and/or walking on Sheldon Road to get to their neighborhood schools, with no sidewalks, is clearly putting their safety at great risk.

The immediate impact of the Summer Villas on this proposed site will significantly increase traffic flow. Roadways are primarily two-lane country roads, as defined by the city of Elk Grove's adopted Rural Road Standards.

Letter 5 Cont.

5-19 Cont.

Therefore, thorough police service studies on the following must be conducted:

- Increased demand for additional police services
- Safety elements
- In-house loss prevention and on-security coverage
- Increased demand for construction of the proposed project

Fire Protection

Demand for additional fire protection staff, equipment, or fire facilities will increase significantly to maintain an acceptable level of service. The proposed project will increase the demand for fire protection services and infrastructure.

5-20

Residents in the rural area have already been warned about the decreased response time due to the need for additional fire stations.

The Elk Grove Community Services District's goals, policies and actions intended to provide fire protection to ensure the public's health and safety will be significantly compromised and must be addressed in the Draft EIR.

Solid Waste

The proposed project will create a larger demand for solid waste services and generate solid waste in an amount greater than the ability of local landfill facilities to accommodate such waste.

Extensive studies must include:

5-21

- Comprehensive and sufficient plan for collecting, storing and transporting recyclable and non-recyclable materials;
- Sufficient number of receptacles placed throughout the proposed site that would encourage proper disposal of recyclable materials;
- Acceptable means and methods of pick-up and transportation of solid waste.



Letter 5 Cont.

5-21 Cont. Even with the implementation of the above measure, solid waste impacts will be at a significant level.

Runoff

A large housing project in the rural area will increase runoff volume and speed, leading to more frequent and severe flooding. This runoff carries pollutants like oil, fertilizers, and sediment into waterways, which can degrade water quality, harm aquatic life through processes like eutrophication, and increase erosion. Construction itself adds a significant amount of sediment to waterways, damaging habitats.

Impacts on Flooding

5-22

- **Increased volume and speed:** Replacing natural ground with impervious surfaces like roads and rooftops means less water soaks into the ground. This increases the volume and speed of stormwater runoff, overwhelming natural drainage systems.
- **More frequent floods:** A faster, more voluminous flow can lead to more frequent and severe flooding downstream, potentially damaging property.
- **Faster peak flows:** The time it takes for peak runoff to occur after a rainfall event is significantly reduced, leading to flashier floods.

Impacts on Water Quality

- **Pollutant transport:** Runoff collects a variety of pollutants from new developments, including oil, pesticides, fertilizers, and pet waste.
- **Sedimentation:** Construction activities generate a large amount of sediment, which can smother aquatic habitats, clog streams, and make water murky.

5-23

- **Nutrient pollution:** Excess nutrients, particularly nitrogen and phosphorus from fertilizers, can lead to excessive algae growth.
- **Pathogens:** Wastewater from sewage systems, if not treated properly, can introduce pathogens into waterways, posing a risk to public health and ecosystems.

Letter 5 Cont.

Special Planning Area

5-24 (SPA Zoning) The application process is incomplete. The applicant's requested SPA and Elk Grove Zoning amendments are incomplete. Why was that allowed?

Traffic

5-25 A large housing project in a rural area will cause increased traffic congestion and strain on existing roads, as it adds new residents and the associated trips. This will lead to greater wear and tear on rural roads, which were not designed for high volume, and will also increase traffic noise and air pollution.

Direct impacts on traffic and infrastructure

- **Increased traffic volume:** A new housing project, even a smaller one, generates a significant number of daily vehicle trips for commuting, errands, and school runs. A large project will have a magnified effect on roads not built for this level of use.
- 5-26 **Road damage:** Increased vehicle traffic, including larger and heavier delivery trucks, will cause more wear and tear on rural roads, potentially requiring expensive repairs and maintenance that the local government may not have funds for.
- **Congestion and safety:** Traffic jams on narrow, rural roads will become more frequent and potentially longer. This can decrease safety for all road users, including pedestrians and cyclists who may find it harder to navigate the increased traffic.

Secondary and compounding effects

- 5-27 **Strain on emergency services:** More people in the rural area will increase the demand for emergency services like police, fire, and ambulance response times. Existing infrastructure and staff may not be equipped to handle the new demand, leading to delays.
- 5-28 **Impact on existing character:** The influx of new residents and traffic will change the quiet, rural character of the area. This will lead to conflicts over land use and a shift in the community's overall feel.

Letter 5 Cont.

- **Potential for more sprawl:** If the housing project leads to further development in a piecemeal fashion, it will contribute to more sprawl, destroying Elk Grove's rural area for generations to come.

5-29

- **Increased infrastructure strain:** In addition to roads, other utilities like water, sewage, and broadband will struggle to cope with the increased demand from the new development.

5-30

Utilities and Service Systems

A large housing project in a rural area will place a significant strain on existing utility infrastructure, necessitating substantial and often costly upgrades to support increased demand.

Historical Significance

Totally ignored and unaddressed in the Draft EIR is the historical significance of Elk Grove's "unique" rural area, along with the detriment to the quality of life of rural residents, whether they have lived in the rural area for decades, or having just built their new homes across the street from the proposed project which the applicants also owned.

5-31

The historical significance of rural Elk Grove lies in its reflection of the area's agricultural roots, which persist today, and its role as a stagecoach stop during the Gold Rush. Originally a stage stop that relocated due to the arrival of the railroad, Elk Grove grew into a center for agriculture, and today, the "Rural Area" preserves this heritage through open spaces, farms, and ranch-style homes, distinct from the more urbanized areas of Elk Grove.

A lasting legacy: Today, the "Rural Area" between Elk Grove-Florin Road, Sheldon Road, and Grant Line Road preserves Elk Grove's agricultural past with open spaces for cattle and horses, and fields for fruits and vegetables providing food to those in need.

5-32

Letter 5 Cont.

Preserving a way of life: The Rural Area is an asset that provides a "genuine taste of a rural lifestyle" for residents and enhances the overall attraction of new residents to Elk Grove.

5-32 Cont.

Children who live and raise animals in a rural area develop crucial life skills, gain physical and mental health benefits, and form a deeper connection with nature and the life cycle. Key advantages include increased responsibility, confidence, empathy, and physical activity, as well as a greater appreciation for food and the environment. They also tend to be more physically active, experience less stress, and have a stronger connection to their families.

5-33

Historic preservation: The city of Elk Grove has a local historic preservation ordinance and has established a register of historic resources, including the Elk Grove Historic District. The "Rural Area" certainly qualifies for "historic preservation."

Closing Statement

The proposed Summer Villas large housing project is incompatible with Elk Grove's rural community, as it will negatively impact infrastructure, strain resources, and destroy the unique character that drew residents here in the first place.

5-34

Urban development in rural Elk Grove will affect the quality of life in rural areas through changes to air and water quality, infrastructure, and the preservation of rural character. Increased vehicle traffic contributes to poorer air quality, while development increases impervious surfaces, which can impact water quality.

The Summer Villas proposed project will also challenge the rural lifestyle, particularly for those in animal husbandry, as it can lead to concerns about preserving the rural identity and heritage, and can cause fragmentation of agricultural land.



Letter 5 Cont.

5-34 Cont.

The proposed scale is inappropriate, and the developer has not adequately addressed critical issues relating to aesthetics, air quality, land use, traffic, water resources, and environmental impact.

We ask you to vote no on the proposed Summer Villas project and instead explore solutions that respect the existing community and find more suitable location for this large-scale urban development.

LETTER 5: ANONYMOUS CONCERNED RESIDENTS GROUP

Response to Comment 5-1

The comment is introductory and summarizes comments contained within Responses to Comments 5-2 through 5-33 below. Please see the responses below for further detail.

Response to Comment 5-2

Potential impacts related to aesthetics, including substantially degrading the existing visual character and impacts related to light and glare, are evaluated within Chapter 4.1, Aesthetics, of the Draft EIR. Please see Master Response 1 regarding comments related to community character.

The potential impacts to views from the identified key viewpoints are evaluated under Impact 4.1-1 of the Draft EIR, which concluded that the Project would substantially impact the existing visual character from an undeveloped grassy field with one single-unit residence building to multiple single-unit residences and private recreational development, and that feasible mitigation does not exist to reduce the identified impact to a less-than-significant level. In addition, the potential for the Project to create a new source of substantial light or glare which would adversely affect day or nighttime views in the area is evaluated under Impact 4.1-3, which concluded that the Project could result in a potentially significant impact and that Mitigation Measure 4.1-3 would not reduce the identified impact to a less-than-significant level. Therefore, the Draft EIR adequately addresses the aesthetics concerns contained within the comment.

Response to Comment 5-3

Potential impacts related to air quality, including mobile source emissions and pollutants, are addressed within Chapter 4.2, Air Quality, Greenhouse Gas Emissions, and Energy, of the Draft EIR. As discussed under Impact 4.2-2 therein, emissions of reactive organic gases (ROG), oxides of nitrogen (NO_X), and particulate matter (PM) 10 micrometers in diameter (PM_{10}) and 2.5 micrometers in diameter ($PM_{2.5}$) were estimated. The Project's operational emissions are presented in Table 4.2-9 of the Draft EIR. As shown therein, the emissions resulting from operation of the Project would be below all applicable SMAQMD thresholds of significance. Therefore, operation of the Project would not create a conflict with nor obstruct implementation of the applicable air quality plan, and a less-than-significant impact would result.

In addition, the potential for the Project to result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment was evaluated under Impact 4.2-6 of the Draft EIR. As discussed above, the Project's unmitigated operational emissions would be below the SMAQMD's applicable thresholds of significance. Therefore, the Project's incremental contribution to regional air quality impacts would be less than cumulatively considerable.

Response to Comment 5-4

Page 4.2-45 of the Draft EIR includes the following related to carbon monoxide (CO):

> Localized concentrations of CO are related to the levels of traffic and congestion along streets and at intersections. Per the SMAQMD Guide, emissions of CO are generally of less concern than other criteria pollutants, as operational activities are not likely to generate substantial quantities of CO, and the SVAB has been in attainment for CO for multiple

years.[3] Consequently, the Project is not anticipated to result in significant impacts to air quality related to localized CO emissions.

In addition, while SMAQMD does not currently maintain a CO emission threshold, the Placer County Air Pollution Control District (PCAPCD), a nearby air district, provides a screening level threshold for localized CO emissions, which is based on whether vehicle operations associated with a Project would produce more than 550 pounds per day (lbs/day) of mobile-source CO emissions. According to the CalEEMod modeling performed for the Project, unmitigated operational mobile-source CO emissions would be 28.8 lbs/day. Therefore, contrary to the comment, the Project would not result in a significant increase in CO concentrations.

Based on the above and because the comment does not present substantial evidence to support the claim that project-generated traffic would result in a significant increase in CO emissions, further response is not necessary.

Response to Comment 5-5

As noted on page 4.2-45 of the Draft EIR, operational-related emissions of toxic air contaminants (TACs) are typically associated with stationary diesel engines or land uses that involve heavy truck traffic or idling. For example, the California Air Resources Board's (CARB) Handbook, evaluates pollutant concentrations against industrial distribution centers (e.g., a warehouse that accommodates more than 100 heavy-duty trucks per day). The residential and recreational land uses proposed by the Project would not involve any stationary diesel engines nor heavy truck traffic or idling. Thus, the Draft EIR concluded that the Project would not expose sensitive receptors to substantial concentrations of diesel particulate matter (DPM) during operations.

With respect to Project construction, methodologies for conducting health risk assessments are associated with long-term exposure periods (e.g., over a 30-year period or longer). Construction activities associated with the Project were estimated to occur over an approximately two-year period, which is not anticipated to result in health risks associated with DPM.

Response to Comment 5-6

The topics listed in the comment are all addressed within Chapter 4.2, Air Quality, Greenhouse Gas Emissions, and Energy, of the Draft EIR. For example, localized CO emissions, TACs, and potential health effects associated with ozone emissions are addressed under Impact 4.2-3 of the Draft EIR. Other factors listed by the comment, including the nearest sensitive receptors, attainment statuses, standards of significance, and regional air quality planning are discussed throughout the chapter.

Response to Comment 5-7

The potential impacts of the Project on biological resources, including wetlands, are discussed throughout Chapter 4.3, Biological Resources, of the Draft EIR. As discussed therein, all potential impacts related to biological resources would be less than significant or would be mitigatable to less-than-significant levels with implementation of the measures within the chapter. For example, as discussed under Impact 4.3-10 of the Draft EIR, the Project would be required to obtain a Section 404 permit from the U.S. Army Corps of Engineers (USACE) and a Section 401 permit from the Regional Water Quality Control Board (RWQCB) and comply with all the conditions set

[3] Sacramento Metropolitan Air Quality Management District. *Guide to Air Quality Assessment, Chapter 4: Operational Criteria Air Pollutant and Precursor Emissions*. April 2021.

forth by said permits. As a result, the Draft EIR appropriately concluded that the Project would not have a substantial adverse effect on State- or federally protected wetlands.

Potential impacts to water quality associated with the Project were evaluated under Impacts 4.7-1 and 4.7-2 of the Draft EIR. Mitigation Measures 4.7-1, 4.7-2(a), and 4.7-2(b) require compliance with various City and regional standards regulating water quality. Based on the analysis therein and with implementation of mitigation, the impacts were determined to be less than significant.

Potential impacts related to indoor air quality were not included in the Draft EIR due to the residential nature of the Project, which is not associated with significant indoor air quality concerns, as well as CEQA's narrow focus on impacts of a proposed project on the environment, not the effects of a project on any proposed residents.

Response to Comment 5-8

Please see Master Response 1. It should be noted that cumulative impacts are discussed at the end of each environmental analysis chapter (i.e., Chapters 4.1 through 4.11) within the Draft EIR, and growth-inducing effects are discussed under Section 6.2, Growth-Inducing Impacts, within Chapter 6, Statutorily Required Sections, of the Draft EIR.

Response to Comment 5-9

Please see Master Response 1. The comment is unclear; however, based on the inferred intention of the comment, the commenter is directed to Chapter 3, Project Description, of the Draft EIR, which describes the Project components analyzed within each environmental analysis chapter (i.e., Chapters 4.1 through 4.11).

Response to Comment 5-10

Please see Master Response 1, as well as Responses to Comments 5-2 through 5-10 above. With respect to water supply and increased impervious surfaces, please see Response to Comment 8-2. Potential impacts related to erosion were addressed in Chapter 4.5, Geology and Soils, of the Draft EIR. As discussed therein, the Project would not result in substantial soil erosion or the loss of topsoil, and such impacts would be less than significant.

Response to Comment 5-11

The potential impacts of the Project on cultural and tribal cultural resources are evaluated within Chapter 4.4, Cultural and Tribal Cultural Resources, of the Draft EIR. As noted therein under Impact 4.4-1, the extent of disturbance associated with the off-site improvements to the Sheldon Road/Waterman Road and Sheldon Road/Bradshaw Road roundabout is not currently known, and such improvements could cause a substantial adverse change in the significance of a historical resource. However, implementation of Mitigation Measure 4.4-1 would reduce the identified potentially significant impacts to less-than-significant levels.

With respect to the surrounding rural area, pursuant to CEQA Guidelines Section 15064.5(a)(1), historic resources include those listed in, or determined to be eligible by the State Historical Resources Commission for listing in, the California Register of Historical Resources (CRHR). In addition, pursuant to Section 15064.5(a)(2), a resource included in a local register of historical resources, as defined in section 5020.1(k) of the PRC or identified as significant in an historical resource survey meeting the requirements of Section 5024.1(g) of the PRC, shall be presumed to be historically or culturally significant. The rural area of Elk Grove has not been listed in any local or State register or identified as significant in a historical resource survey.

The City does maintain one historic district, the Elk Grove Historic District, which is located along Elk Grove Boulevard corridor between Elk Grove Florin Road and Waterman Road (approximately 1.64 miles southwest of the site).Therefore, a historic district does not exist for the rural area. In addition, as discussed on page 4.4-1 of the Draft EIR, 288 built environmental resources in the City's General Plan planning area have either been identified or evaluated for inclusion in the Elk Grove Register of Historic Resources (Elk Grove Register), CRHR, or NRHP. The City of Elk Grove adopted Resolution No. 2024-204 on October 23, 2024, to include 54 historic resources to the Elk Grove Register. The Elk Grove Register does not include the rural area referenced by the comment.

The foregoing efforts by the City are intended to preserve historic character, but the preservation efforts associated with the historic areas and the Elk Grove Register are not relevant to the site and do not apply to the Project.

Furthermore, pursuant to Section 15064.5(a)(3), a resource is considered "historically significant" under Section 15064.5 of the CEQA Guidelines if the resource retains integrity and one or more of the following CRHR criteria have been met:

1) The resource is associated with events that have made a significant contribution to the broad patterns of California history;
2) The resource is associated with the lives of important persons from our past;
3) The resource embodies the distinctive characteristics of a type, period, region or method of construction, or represents the work of an important creative individual or possesses high artistic values; or
4) The resource has yielded, or may be likely to yield, important information in prehistory or history.

In addition, cultural resources determined eligible for the National Register of Historic Places (NRHP) by a federal agency are automatically eligible for the CRHR. Four criteria are used to determine if a potential resource may be considered significant and eligible for listing on the NRHP. The criteria include resources that:

A. Are associated with events that have made a significant contribution to the broad patterns of history; or
B. Are associated with the lives of persons significant in our past; or
C. Embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
D. Have yielded or may likely yield information important in prehistory or history.

As discussed in Chapter 4.4, Cultural and Tribal Cultural Resources, of the Draft EIR, the site does not contain resources that meet the criteria for consideration as an historic property, historical resource, or unique archaeological resource pursuant to Section 106 of the NHPA or CEQA and the site is not eligible for the NRHP or CRHR. In addition, the rural area is not considered "historically significant," pursuant to Section 15064.5(a)(3) of the CEQA Guidelines, as the rural area does not meet the criteria of the CRHP or NRHP.

Response to Comment 5-12

The concerns related to geology and soils noted within the comment are addressed within Chapter 4.5, Geology and Soils, of the Draft EIR. As noted on page 4.5-13 therein, the analysis

presented within the chapter is based primarily on the Geotechnical Engineering Report prepared for the Project by Wallace Kuhl & Associates (WKA). The Geotechnical Engineering Report was included as Appendix F to the Draft EIR and evaluates the subsurface soil and geologic conditions within the site, as well as provides conclusions and recommendations related to the geotechnical and geologic aspects of the Project.

Potential impacts related to hydrology and water quality associated with on-site soils (i.e., hydrogeology) are discussed under Impact 4.5-2, and potential impacts related to the rupture of a known earthquake fault, strong seismic ground shaking, and seismic-related ground failure were discussed under Impact 4.5-1 of the Draft EIR. Mineral resources are discussed under Section 5.7 within Chapter 5, Effects Not Found to be Significant, of the Draft EIR.

Settlement and expansive soils are discussed under Impact 4.5-3 of the Draft EIR. Due to the site's low potential for liquefaction, the potential for seismically induced settlement to occur at the site is also considered to be low. However, the Geotechnical Engineering Report identified that on-site expansive soils could cause differential movement and significant damage to overlying structures. Thus, implementation of Mitigation Measure 4.5-3 is included in the Draft EIR to reduce the identified impact to less-than-significant levels.

Response to Comment 5-13

The concerns related to hazards and hazardous materials noted within the comment are addressed within Chapter 4.6, Hazards and Hazardous Materials, of the Draft EIR. As discussed therein, a Phase I Environmental Site Assessment (ESA) was prepared to evaluate whether evidence of Recognized Environmental Conditions (RECs) exist on-site. The Phase I ESA was performed in general accordance with the American Society for Testing and Materials (ASTM) E1527-13 standard and included a review of historical records, environmental databases, site reconnaissance, and interviews. The Phase I ESA was included as Appendix G of the Draft EIR.

As noted throughout the chapter, odors, surface staining, stressed vegetation, or other obvious evidence of the presence of hazardous materials, were not observed. With respect to petroleum products specifically, page 4.6-24 notes that petroleum odors and/or staining could be observed during grading and/or excavation activities associated with Project construction. Thus, Mitigation Measure 4.6-2(b) was included within the Draft EIR, which establishes the required courses of action if indicators of apparent soil contamination are encountered during Project construction.

As discussed under Impact 4.6-1 of the Draft EIR, operations of the Project would not include any activities that would involve substantial amounts of hazardous materials. Project construction would involve the use of heavy equipment, which would contain fuels and oils, and various other products such as concrete, paints, and adhesives. However, as noted on page 4.6-22 of the Draft EIR, the Project contractor would be subject to all California Health and Safety Codes, local County ordinances, and would be the required to notify the Sacramento County Environmental Management Department (EMD) in the event of an accidental release of a hazardous material, who would then monitor the conditions and recommend appropriate remediation measures.

Response to Comment 5-14

The concerns related to water quality noted within the comment are addressed within Chapter 4.7, Hydrology and Water Quality, of the Draft EIR.

The increase in impervious surface area and associated discharge of polluted stormwater or non-stormwater runoff is addressed under Impact 4.7-2. Potential discharge of pollutants during Project construction is discussed under Impact 4.7-1. As discussed therein, with implementation of Mitigation Measures 4.7-1 through 4.7-2(b), impacts would be less than significant.

With respect to the adjacent properties, the proposed low-impact development (LID) features, including the bio-retention basins and hydromodification basin, would be sufficiently sized to meet the required storage volumes to handle all on-site stormwater, thereby preventing off-site flooding.

Response to Comment 5-15

The concerns related to hydrology and water quality noted within the comment are addressed within Chapter 4.7, Hydrology and Water Quality, of the Draft EIR. The comment does not provide substantial evidence that the concerns listed therein would occur beyond what was addressed in the Draft EIR; therefore, further response is not required.

Response to Comment 5-16

Urban sprawl is not considered an environmental effect addressed under CEQA. In addition, as discussed within Chapter 5, Effects Not Found to be Significant, of the Draft EIR, the site is not designated by the California Department of Conservation's (DOC's) California Important Farmland Finder as farmland protected under CEQA. In addition, while the site is currently zoned Agricultural Residential-Two Acre Minimum (AR-2), which allows for agricultural uses, the site is not currently used for agricultural purposes.

Potential impacts to wildlife habitat are discussed throughout Chapter 4.3, Biological Resources, of the Draft EIR. As discussed throughout Impact 4.3-1 through 4.3-11, all identified potential impacts would be reduced to less-than-significant levels with the implementation of the mitigation measures therein.

With respect to Project infrastructure, as noted on page 4.8-17 of the Draft EIR, the infrastructure included in the Project would be sized to accommodate only the Project and would not add capacity beyond what is needed to serve the site. The utility improvements included in the Project would be designed to serve only the proposed residences.

Compatibility of a project with the existing land uses of an area is ultimately the decision of the lead agency (in the case of the Project, the City of Elk Grove). The Project applicant is requesting approval of a Rezone from AR-2 to SPA, for which the City of Elk Grove City Council has the final decision-making authority. The comment has been noted and will be forwarded to the decision-makers for their consideration.

Response to Comment 5-17

Please see Master Responses 1 and 2. It should be noted that cumulative impacts are discussed at the end of each environmental analysis chapter (i.e., Chapters 4.1 through 4.11) within the Draft EIR.

Response to Comment 5-18

The concerns related to noise noted within the comment are addressed within Chapter 4.9, Noise, of the Draft EIR. The potential for the Project to generate a substantial temporary increase in ambient noise levels in excess of applicable standards was evaluated under Impact 4.9-1. As discussed therein, implementation of Mitigation Measures 4.9-1(a) and 4.9-1(b) would reduce the

identified significant impact but the temporary noise impact related to the proposed off-site improvements would remain significant and unavoidable. As discussed under Impact 4.9-2, the Project would not result in the generation of a substantial permanent increase in ambient noise levels in the vicinity of the Project in excess of applicable standards.

The Noise chapter was primarily based on the Environmental Noise Assessment prepared for the Project by Saxelby Acoustics, LLC. Saxelby Acoustics, LLC is headed by Luke Saxelby, who is board certified by the Institute of Noise Control Engineering (INCE). The Project-specific Environmental Noise Assessment was included as Appendix K of the Draft EIR.

Response to Comment 5-19

Appendix G of the CEQA Guidelines establishes that an impact is significant if the construction of new facilities required to maintain service ratios would cause significant environmental impacts, rather than impacts related to public services being considered significant if a change in service ratios occurs. As noted on page 4.10-20 of the Draft EIR, the Elk Grove Police Department (EGPD) has indicated to the City that new or physically altered law enforcement facilities would not be needed to adequately serve the Project.[4] Therefore, a significant impact related to public services and the EGPD would not occur as a result of the Project.

Please see Master Response 2 related to traffic congestion versus VMT and Master Response 1 related to home security, which is not a CEQA issue. In addition, potential impacts related to increased roadway hazards due to a geometric design feature (e.g., dangerous intersections) are evaluated under Impact 4.11-5 of the Draft EIR within Chapter 4.11, Transportation.

Response to Comment 5-20

Appendix G of the CEQA Guidelines establishes that an impact is significant if the construction of new facilities required to maintain service ratios would cause significant environmental impacts, rather than impacts related to public services being considered significant if a change in service ratios occurs. While the comment notes that additional fire stations are needed, as noted on page 4.10-19 of the Draft EIR, the Cosumnes Community Services District (CCSD) has confirmed implementation of required fire protection measures and payment of required fees would ensure the Project's potential impacts on fire protection services would be less than significant.[5]

Response to Comment 5-21

As discussed under Impact 4.10-9, solid waste would be collected by Republic Services and transported to 10 different landfills. Table 4.10-2 of the Draft EIR lists the aforementioned landfills and the remaining capacities of those landfills; as shown therein, the majority of the landfills serving City waste haulers have over 50 percent remaining capacity for an estimated total capacity of 496,458,239 cubic yards. Therefore, contrary to the comment, the solid waste generation estimates in the Draft EIR, which are based off of State and federal standards, would not generate solid waste in excess of the capacity of local infrastructure. The number and location of solid waste collection receptacles will be provided in accordance with the Elk Grove Municipal Code (EGMC) and Republic Services.

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4 Nijjar, Jazvie, Officer, Media and Community Relations Unit, Elk Grove Police Department. Personal communication [email] with City of Elk Grove Community Development Department staff. December 5, 2024.

5 Rey, Lantz, Assistant Fire Chief/Fire Marshal, Fire Department, Cosumnes Community Services District. Personal communication [email] with Elk Grove Community Development Department staff. December 19, 2024.

Response to Comment 5-22

The concerns related to flooding and water quality noted within the comment are addressed within Chapter 4.7, Hydrology and Water Quality, of the Draft EIR. As discussed within Impact 4.7-4, all runoff from the on-site project components and proposed roadways would be collected by the on-site storm drainage system. The Project would incorporate LID controls consistent with the Stormwater Quality Design Manual (SQDM) for the Sacramento region, which would be sufficiently sized to meet the required storage volumes to handle all on-site stormwater, thereby preventing off-site flooding.

However, final sizing and locations of storm drainage improvements have not been determined at this time. Therefore, the Draft EIR included Mitigation Measure 4.7-4, which requires preparation of a design-level drainage report that specifies all final changes in flows and patterns affected by the proposed off- and on-site improvements, as well as all sizing and location calculations. The report shall be prepared by a Registered Civil Engineer and shall be submitted to the City for review and approval. Implementation of Mitigation Measure 4.7-4 would result in a less-than-significant impact related to Project runoff management and flooding.

Response to Comment 5-23

The concerns related to water quality noted within the comment are addressed within Chapter 4.7, Hydrology and Water Quality, of the Draft EIR. The increase in impervious surface area and associated discharge of polluted stormwater or non-stormwater runoff is addressed under Impact 4.7-2. Potential discharge of pollutants during Project construction is discussed under Impact 4.7-1. As discussed therein, with implementation of Mitigation Measures 4.7-1 through 4.7-2(b), impacts would be less than significant.

Response to Comment 5-24

Please see Master Response 1. The comment does not specify what the SPA and zoning amendments are missing. The City of Elk Grove Community Development Department determined the application was complete.

Response to Comment 5-25

Please see Master Response 2.

Traffic noise at existing noise-sensitive receptors was evaluated under Impact 4.9-2 of the Draft EIR. As discussed therein and shown in Table 4.9-11, the increase in traffic noise levels at the existing sensitive receptors located near roadway segments attributable to the Project would be less than significant.

Air pollution generated from mobile sources (i.e., Project traffic) is discussed under Impact 4.2-2 of the Draft EIR. As shown in Table 4.2-9 of the Draft EIR, the emissions resulting from operation of the Project would be below all applicable SMAQMD thresholds of significance.

Response to Comment 5-26

Please see Master Response 2. Contrary to the comment, the proposed residential land uses would not involve long-term or frequent operations of any heavy trucks. The existing roadways in the vicinity of the site are built to accommodate the standard vehicle fleet assumed to drive within residential areas, including package delivery vans and trucks. The amount of delivery vans and trucks that would travel to the site would not be outside of the norm for residential uses and would not be anticipated to cause damage to local roadways. Furthermore, future residents of the

Project would contribute taxes funding the maintenance of local roadways pursuant to EGMC Chapter 3.24, and the Project would be subject to development impact fees, including the City roadway impact fee, pursuant to EGMC Chapter 16.95. Potential impacts on bicycle facilities are addressed in Impact 4.11-2.

Response to Comment 5-27

Please see Responses to Comments 5-19 and 5-20 above.

Response to Comment 5-28

Please see Master Response 1. The comment has been noted for the record and will be forwarded to the decision-makers as part of their consideration of the Project.

Response to Comment 5-29

Please see Master Response 1, as urban sprawl is not considered an environmental effect addressed under CEQA. In addition, CEQA Guidelines Section 15126.2(e) requires an EIR to evaluate the potential growth-inducing impacts of a Project. Accordingly, potential growth-inducing impacts associated with the Project are discussed within Chapter 6 of the Draft EIR.

Furthermore, subsequent to release of the Draft EIR, the Project applicant requested that Economic & Planning Systems, Inc. (EPS) conduct an analysis of the economic feasibility of extending urban services to the site and the surrounding Rural Area properties that may be large enough to accommodate housing development (see Appendix A of this Final EIR).[6] As determined therein, undeveloped areas within the Rural Area of Elk Grove would not be economically feasible to develop with residential uses with similar densities as the Project. As such, the Project's feasibility is specific to its scale and location and would not be expected to extend to other parcels in the Rural Area, and approval of the Project would not be expected to make similar development financially viable elsewhere in the Rural Area.

Response to Comment 5-30

The concerns related to utilities noted within the comment are addressed within Chapter 4.10, Public Services and Utilities, of the Draft EIR. Impact 4.10-6 concludes that the Project would not require or result in the relocation or construction of new or expanded water, wastewater conveyance, electric power, natural gas, or telecommunications facilities that could cause significant environmental effects. The comment does not provide substantial new evidence related to utility infrastructure capacity; therefore, further response is not necessary.

Response to Comment 5-31

Please see Response to Comment 5-11.

Response to Comment 5-32

Please see Master Response 1.

Response to Comment 5-33

Please see Response to Comment 5-11.

[6] Economic & Planning Systems, Inc. *Development Feasibility Analysis of Summer Villas and Comparison Sites in the Rural Area of Elk Grove*. July 30, 2026.

Response to Comment 5-34

The comment is conclusory and summarizes comments contained within the comment letter. Please see Responses to Comments 5-2 through 5-33 above and Master Response 1 for further detail.

Letter 6

We Country Living

Greater Sheldon Road Estates Homeowners Association

November 20, 2025

Greater Sheldon Road Estates Homeowners Association (GSREHA)
9601 Sandage Ave
Elk Grove, CA 95624

City of Elk Grove
Kyra Killingsworth, Senior Planner
kkillingsworth@elkgrove.gov

RE: Summer Villas SPA DEIR—PLNG23-007

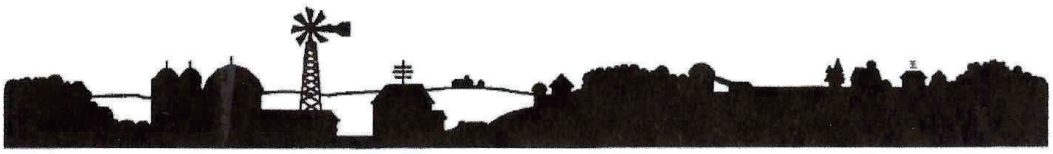
Kyra,

6-1 This comment is in response to the Draft Environmental Impact Report (DEIR, SCH #20240804070), regarding the Summer Villas SPA Project (PLNG23-007). We believe the Draft EIR is inconsistent in its designation of the Project Site as "urbanized" and "non-urbanized". We further believe that the Lead Agency must choose one or the other. As discussed in the attached, per the CEQA definition, and the fact that the EIR process is a CEQA process, the Project Site should be designated as "non-urbanized".

Sincerely,

Eileen Conwell

Eileen Conwell
President



Letter 6 Cont.

DEIR Page 156 Method of Analysis

Pursuant to Appendix G of the CEQA Guidelines, different aesthetic standards apply in "non urbanized" and "urbanized areas" respectively. For non-urbanized areas, the inquiry asks whether a proposed project "would substantially degrade the existing visual character or quality of views of the site and its surroundings." For urbanized areas, the question is whether the project would "conflict with applicable zoning and other regulations governing scenic quality." Under the CEQA Guidelines, "urbanized area" is a term defined in CEQA Guidelines Section 15387 as "a central city or a group of contiguous cities with a population of 50,000 or more, together with adjacent densely populated areas having a population density of at least 1,000 persons per square mile." Based on the CEQA definition **and** that the Project area is designated as an urban area by the latest U.S. Census map (see Figure 4.1-5), the site meets the definition for an urbanized area.

Based upon the definition in CEQA **§ 15387** below and the ACS results highlighted below on page 159 of the DEIR, the site **does not** meet the definition of an "urbanized" area.

Cal. Code Regs. Tit. 14, § 15387 - Urbanized Area

6-2

"Urbanized area" means a central city or a group of contiguous cities with a population of 50,000 or more, together with adjacent densely populated areas having a population density of at least 1,000 persons per square mile. A lead agency **shall** determine whether a particular area meets the criteria in this section either by examining the area **or** by referring to a map prepared by the U.S. Bureau of the Census which designates the area as urbanized. Maps of the designated urbanized areas can be found in the California EIR Monitor of February 7, 1979. The maps are also for sale by the Superintendent of Documents, U.S. Government Printing Office, Washington, D.C. 20402. The maps are sold in sets only as Stock Number 0301-3466. Use of the term "urbanized area" in Section 15182 is limited to areas mapped and designated as urbanized by the U.S. Bureau of the Census. Lead Agency must choose one or the other. Site does not meet the criteria set forth in CEQA to be determined "urbanized". Only one choice: CEQA is the determining language.

DEIR Page 159

By contrast, in less developed areas, concerns about mass and height and how they affect existing visual conditions are more appropriate. The site is within the City's Rural Area Community Plan and is surrounded by rural residences, a high school/middle school complex to the southeast, and mostly undeveloped land with a with a non-profit horse rescue operation to the south. According to survey results from the American Community Survey (ACS), the surrounding populated areas **do not include 1,000 persons per square mile.** Thus, due to the rural nature and low population of the site vicinity, the City has chosen to also analyze the site as a "non-urbanized area" in addition to the analysis as an urbanized area.

Letter 6 Cont.

DEIR Pages 421-422 **Site and Surrounding Areas are Non-Urbanized.**

Land Use Designations and Zoning Districts

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). Table 4.8-1 provides a summary of the current General Plan land use and zoning designations of the properties adjacent to the site.

Table 4.8-1
Summary of Adjacent Land Use Designations and Zoning Districts

Relationship to Site	Current Land Use	Land Use Designation	Zoning Designation
North	Open Space, Rural Residences	RR	AR-2, Flood Combining District (F)
South	Undeveloped Land, Horse Rescue, and Estate Residences	Estate Residential (ER)	Agricultural Residential-One Acre Minimum (AR-1)
East	Rural Residences, Undeveloped Land	RR	AR-2, Agricultural Residential-Five Acre Minimum (AR-5)
West	Open Space, Rural Residences	RR	AR-2 and Special Planning Area (SPA)

6-3

Land Use Designation Definitions

The following sections provide definitions of the land use designations noted above, as summarized from the City of Elk Grove General Plan.

Rural Residential (RR)

RR uses are generally characterized by large-lot rural residential development. Limited agricultural uses and animal-keeping are also allowed. Lot sizes typically range from two to 10 acres. The RR land use designation allows for a residential density between 0.1 dwelling units per acre (du/ac) to 0.5 du/ac.

Estate Residential (ER)

ER uses are generally characterized by large-lot residential development, including but not limited to ranchette or estate homes. Lot sizes typically range from 0.25 to 2 acres. The ER land use designation allows for a residential density between 0.51 du/ac to 4.0 du/ac.

Zoning District Definitions

The following sections provide definitions of the zoning designations noted above, as summarized from the City of Elk Grove Municipal Code (EGMC) (Title 23).

Agricultural Residential-One Acre Minimum (AR-1)

The AR-1 zoning district is applied to areas of the City to accommodate low density single-family residential uses in a rural setting with agricultural and accessory uses. The AR-1 zoning district implements the Estate Residential (ER) General Plan designation. The AR-1 district allows for one primary residential unit on lots with a minimum size of one gross acre. While the AR-1 zoning district falls within the estate residential density range of the General Plan, the nature and character of the district is more in keeping with the rural residential land use designation of the General Plan. These zoning districts also allow for normal agricultural uses and practices.

Agricultural Residential-Two Acre Minimum (AR-2)

6-3 Cont.

The AR-2 zoning district is applied to areas of the City to accommodate low density single-family residential uses in a rural setting with agricultural and accessory uses. Lots with the AR-2 zoning designation are rural in nature and include small local roadways, animal keeping and raising, equestrian uses, agriculture and limited commercial opportunities. The AR-2 zoning district implements the RR General Plan designation. The AR-2 district allows for one primary residential unit on lots with a minimum size of two gross acres.

Agricultural Residential-Five Acre Minimum (AR-5) The AR-5 zoning district is applied to areas of the City to accommodate low density single-family development along with agricultural and accessory uses. Lots within the AR-5 zoning designation are rural in nature and include small local roadways, animal keeping and raising, equestrian uses, agriculture and limited commercial opportunities. The AR-5 zoning district implements the Rural Residential General Plan designation. The AR-5 zoning district allows for one residential unit on lots with a minimum size of five gross acres.

Special Planning Area (SPA) The purpose of the SPA district is to designate areas for unique and imaginative planning standards and regulations not provided through the application of standard zoning districts.

LETTER 6: GREATER SHELDON ROAD ESTATES HOMEOWNERS ASSOCIATION (1 OF 2)

Response to Comment 6-1

The comment is introductory and summarizes comments contained within Responses to Comments 6-2 and 6-3 below. As discussed in further detail below, the discussion within Chapter 4.1, Aesthetics, of the Draft EIR includes sufficient explanation of the chapter's approach, as well as adequately analyzes the site under the non-urbanized threshold.

Response to Comment 6-2

Section 15387 of the CEQA Guidelines defines the term "urbanized area" as "a central city or a group of contiguous cities with a population of 50,000 or more, together with adjacent densely populated areas having a population density of at least 1,000 persons per square mile." The site is within the boundaries of the City of Elk Grove, which has a population of approximately 176,124. As noted within the comment, Section 15387 of the CEQA Guidelines provides that referring to a map prepared by the U.S. Census Bureau is sufficient to determine whether a site is urbanized. Figure 4.1-5 of the Draft EIR shows that the site is not considered rural, but is predominantly urbanized. Therefore, the site is properly designated as urbanized pursuant to Section 15387 of the CEQA Guidelines for purposes of the aesthetics analysis required by Section I(c) of Appendix G of the CEQA Guidelines. This designation is addressed by the Draft EIR through the urbanized analysis under Impact 4.1-2.

However, Figure 4.1-5 also shows that while the site is urban, the strength of urban predominance is not 100 percent urban and the site is located in a transitional area from urbanized portions of the City to rural. In recognition of the nuances related to the U.S. Census Bureau's designation of the site, as well as the American Community Survey population results for the areas directly surrounding the site, surrounding rural residential uses adjacent to the site, and existing City General Plan and zoning designations of the site, the Draft EIR also conservatively includes the non-urbanized analysis requested by the comment under Impact 4.1-1. The discussion of aesthetic impacts related to both the urban and non-urban standards provides the decision-makers with as much information as possible on which to base their decision.

Response to Comment 6-3

The comment includes an excerpt from Chapter 4.8, Land Use and Planning, of the Draft EIR, and does not comment on the adequacy of the Draft EIR. With respect to the highlighted portions, as discussed in Response to Comment 6-2 above, the prior City designations for the site were incorporated into the analysis of Impact 4.1-1. For the purpose of providing a conservative analysis, the City analyzed impacts related to aesthetics under both the urban and non-urban thresholds, pursuant to CEQA Guidelines Section 15387. However, the analysis of the Project's aesthetic impacts under the urbanized-area threshold does not affect the remainder of the Draft EIR analysis, as the Draft EIR adequately characterizes the site and surrounding area as rural, consistent with the land use and zoning designations.

Letter 7

November 24, 2025

Kyra Killngsworth, Senior Planner
City of Elk Grove
kkillingsworth@elkgrove.gov

RE: Summer Villas SPA DEIR - PLNG23-007

Kyra,

7-1 The attached comments are submitted on behalf of the Greater Sheldon Road Estates HOA (GSREHA). Our comments are in response to the Draft Environmental Impact Report (DEIR, SCH #20240804070), regarding the Summer Villas SPA Project (PLNG23-007).

7-2 We believe the Draft EIR does not provide a thorough and honest analysis of the No Project (Buildout Pursuant to General Plan) Alternative. As an example, without justification, the Draft EIR maintains the eight significant and unavoidable issues pertaining to the Project also pertain to this Alternative.

7-3 The No Project (Buildout Pursuant to General Plan) Alternative was introduced in the Draft EIR as a "reasonable" alternative and, therefore, must be given serious consideration. This Alternative consists of a maximum of 35 2-acre parcels as codified in the EG General Plan. The General Plan has twice been updated, including certified EIRs, accounting for this rural density.

7-4 As for the Draft EIR Alternatives Analysis conclusion that the Aquatic Resource Avoidance Alternative is the Environmentally Superior Alternative is inconceivable and not substantiated. The Aquatic Resource Avoidance Alternative consists of 422 housing units which is an 1100% increase in units over the No Project (Buildout Pursuant to General Plan) Alternative. Additionally, the eight significant and unavoidable issues, road improvements, and sewer and water intrusions that pertain to the Project also pertain to the Aquatic Resource Avoidance Alternative.

7-5 The Aquatic Resource Avoidance Alternative appears to have been deemed superior based on the premise it meets most of the applicant's stated Project Objectives. Several Project Objectives include "the preservation of open space". Open space refers to utility Right of Way restrictions, creek protection, and flood plain setbacks. Any approved project on this site would be constrained by these restrictions, thereby preserving open space. Project Objectives must be re-stated or deleted.

Thank you for the opportunity to respond.

Sincerely,

Eileen Conwell

Eileen Conwell,
GSREHA President
frankneileen@comcast.net

Attachment (10 pages)

Letter 7 Cont.

11/24/25, GSREHA's Summer Villas SPA DEIR response

Chapter 2 – Executive Summary

We take issue with the Executive Summary

Section 2.4 – Summary of Project Alternatives

7-6 **ISSUE**: No Project (Buildout Pursuant to General Plan) Alternative requires significant revision once the issues and comments presented in this document have been addressed.

If an impact is Significant and Unavoidable and remains such after mitigation, then the heading "The significant impacts that would be reduced (or similar) under the Alternative..." is extremely misleading. **ISSUE**: Where applicable, "Significant and Unavoidable" should be spelled out. "Reduced" (or "similar") does not mean the same.

7-7 The list of significant impacts listed for Aquatic Resource Avoidance Alternative includes Significant and Unavoidable items, 4.1-1, 4.1-3, 4.1-4, 4.8-3, 4.8-5, and 4.9-1. **ISSUE**: Items 4.2-7 and 4.11-4 must be added.

7-8 The paragraph following the Aquatic Resource Avoidance Alternative bullets is extremely confusing. The statement "the above mentioned significant and unavoidable impacts would be reduced..... and the impacts would remain significant and unavoidable". **ISSUE**: It can't be both ways; a significant and unavoidable conclusion is a significant and unavoidable conclusion. Same issue with the last sentence "The significant and unavoidable impacts related to . . . . . would remain similar under the Alternative as compared to the Project".

Environmentally Superior Alternative

7-9 **ISSUE**: This description eliminates consideration of the No Project (Buildout Pursuant to General Plan) Alternative. This description requires significant revision once the issues and comments presented in this document have been addressed.

Page 1

Letter 7 Cont.

11/24/25, GSREHA's Summer Villas SPA DEIR response

Chapter 3 – Project Description

We take issue with the Project Objectives

Project Objective #1 – To facilitate the development of a 115.9-acre site in the northeastern portion of the City of Elk Grove by removing the property from its Rural Area designation and amending the site's land use designations and zoning to allow for the development of an active adult and senior living community and preservation of open space.

7-10

COMMENT: There is a lot to unpack in this single objective. Seems these several objectives, including amending the General Plan, could be captured under the heading of "create a SPA".

ISSUE: "the preservation of open space" is a function/requirement of the land constrained by power lines along Waterman Road and Laguna Creek running through the property, regardless of the number of housing units built on the site. Preservation of the identified "open space" are required components due to utility Right of Way and creek set back. This is nothing more than "fluff" by the applicant and should not be considered a project objective or meeting the project objective. Applicable also for Project Objectives #5 and #6, which should be deleted.

7-11

Project Objective #3 – To increase the diversity of housing types available in Elk Grove and provide opportunities for senior rural residents to downsize from their current large-lot homes to lower maintenance homes while staying in the Sheldon area.

COMMENT: "To increase the diversity of housing types available in Elk Grove...". Other available Elk Grove 55+ age restricted communities with single-family homes include: Del Webb Glenbrook with 631 units. Heritage Lakeside with 269 units. Esplanade West with 606 units at buildout (still under construction). Elliott Springs with 282 units at buildout (construction will commence soon).

7-12

COMMENT: "...and provide opportunities for senior rural residents to downsize from their current large-lot homes to lower-maintenance homes while staying in the Sheldon area". It is unlikely that after watching the rural area they love be destroyed to build the proposed Project and ruin the rural area atmosphere that senior rural residents would be interested in residing here. This is an urban development in the wrong location.

7-13

ISSUE: The Merriam-Webster dictionary definition of "senior" citizen is "an older adult and especially one who is age 65 or older". The Project's target residents should be referred to as to what it is – age 55+. This should be applied throughout the Draft EIR.

7-14

Page 2

Letter 7 Cont.

11/24/25, GSREHA's Summer Villas SPA DEIR response

Project Objective #4 – To maximize land utilization on the 115.9-acre site by clustering residential units on approximately 55 percent of the site while preserving the remainder of the site in open space and recreation.

7-15 **ISSUE:** The Project site is clearly defined as: East & West neighborhoods = 71.3-acres (which are the site's "developable acres"), Laguna Creek = 20.3-acres, Waterman Rd Rec/Open Space = 19.4-acres, and Roads ROW = 4.9-acres....total 115.9-acres. The Project provides for 499 housing units on 71.3-acres which is the high end of the LDR designation (4-7 per acre). This calculation does not involve clustering. The term "clustering" does not apply to the Project and therefore the Project Objective should be deleted. (Note: Clustering appears to apply to the Aquatic Avoidance Resource Alternative, however, this is a Project Objective and not an Alternative Objective.)

Project Objective #5 – To preserve open space associated with the Laguna Creek corridor and preclude development in areas constrained by existing overhead utility easements and flooding risks.

7-16 **ISSUE:** Same as comments for Project Objective #1. This Project Objective should be deleted.

Project Objective #6 – To preserve approximately 45 percent (39.3-acres) of the 115.9-acre site consisting of: 1) a western 19.4-acre open space area along Waterman Road that contains existing overhead power line easements and 2) a 19.9-acre open space area that encompasses the Laguna Creek corridor, the 100-year floodplain, and setbacks from the giant garter snake habitat surrounding the creek.

7-17 **ISSUE:** Same as comments for Project Objective #1. This Project Objective should be deleted.

Letter 7 Cont.

Project Objective #7 – To develop an on-site bicycle and pedestrian trail network connecting to on-site private roads and to the regional trails network in the vicinity of the site, including a bridge crossing of Laguna Creek to allow for bicycle, pedestrian, and golf cart access between the western and eastern portions of the site.

7-18 **ISSUE:** This Project Objective should be rewritten to be clearer as to which amenities are private (on-site) and which are public (regional). **SUGGESTION:** To develop an on-site (private) bicycle and pedestrian trail network connecting to on-site (private) roads and to the existing regional (public) trails network in the vicinity of the site. Amenities would include a bridge crossing Laguna Creek to allow for resident bicycle, pedestrian, and golf cart access between the western and eastern portions of the site.

Project Objective #8 – To be compatible with surrounding land uses through the combination of Low Density Residential (LDR) and Open Space (P/OS) designations on the 115.9-acre site, preserving setbacks and respecting compatibility in structural height.

7-19 **ISSUE:** The Project is not compatible with surrounding land uses. The project site is zoned RR 2-acre minimum and is surrounded by RR and open space and requires a rezone and General Plan amendments to proceed. Same comments for Project Objective #1, #5 and #6 apply to the phrase "preserving setbacks". "Respecting compatibility in structural height" is a function/requirement of senior housing. This Project Objective should be deleted.

Letter 7 Cont.

11/24/25, GSREHA's Summer Villas SPA DEIR response

Chapter 4 - Existing Environmental Setting, Impacts, and Mitigation

We take issue with the following Project-Specific Impacts and Mitigation Measures as they relate to the No Project (Buildout Pursuant to General Plan) Alternative

Impact 4.1-1 In a non-urbanized area, substantially degrade the existing visual character or quality of views of the site and its surroundings or, in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality.

7-20 For the General Plan Alternative: Due to the site's current RR zoning and the fact that the parcel is surrounded by Rural Residential, the significant difference between a maximum of 35 2-acre parcels versus the Project's 499 units plus recreational facilities makes these impacts worlds apart. Yes, "the Project would substantially degrade the existing visual character or quality of views of the site and its surroundings", however, the view for Buildout to General Plan would be compatible with the surrounding RR environment. We believe this impact is less than significant (not significant and unavoidable).

Impact 4.1-3 Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

7-21 For the General Plan Alternative: Due to the site's current RR zoning and the fact that the parcel is surrounded by Rural Residential, the significant difference between a maximum of 35 2-acre parcels versus the Project's 499 units plus recreational facilities makes these impacts worlds apart. Yes, "the Project would introduce additional sources of light and glare where none currently exists", however the light and glare generated for Buildout to General Plan would be compatible with the surrounding RR environment. We believe this impact is less than significant (not significant and unavoidable).

Impact 4.1-4 Long-term changes in visual character associated with cumulative development of the Project in combination with future buildout of the City of Elk Grove.

7-22 For the General Plan Alternative: Because Buildout Pursuant to General Plan would not require a General Plan/Rural Community Plan Amendments the site would remain Rural Residential, and the project site would result in development at a lower density, in line with what was anticipated for the site in the General Plan EIR. We believe this impact is less than significant (not significant and unavoidable).



Letter 7 Cont.

Impact 4.2-7 Generation of GHG emissions that may have a significant impact on the environment or conflict with an applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

7-23

For the General Plan Alternative: Because the site as is has been accounted for within the City's CAP, no additional CAP consistency analysis is required for Buildout to General Plan. We believe this impact is less than significant (not significant and unavoidable).

Impact 4.8-3 Induce Substantial unplanned population growth in an area, either directly (e.g., by proposing new homes) or indirectly (e.g., through projects in an undeveloped area).

7-24

For the General Plan Alternative: Because the site as is has been accounted for within the City's household and population estimates, Buildout to General Plan would not exceed the anticipated housing unit growth and would be within the SACOG or City of Elk Grove growth estimates for the Rural Area Community Plan. Buildout to General Plan would not induce substantial unplanned population growth. We believe this impact is less than significant (not significant and unavoidable).

Impact 4.8-5 Cumulative unplanned population growth.

7-25

For the General Plan Alternative: Because the site as is has been accounted for within the Rural Residential Plan Area and the 2020 MTP/SCS projections, Buildout Pursuant to General Plan would not exceed population growth projections. We believe this impact is less than significant (not significant and unavoidable).

Impact 4.9-1 Generation of a substantial temporary increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

7-26

For the General Plan Alternative: Buildout to General Plan would not require off-site improvements and, therefore, would not generate the associated noise levels. We believe this impact is N/A (not significant and unavoidable).

Letter 7 Cont.

11/24/25, GSREHA's Summer Villas SPA DEIR response

Impact 4.11-4 Conflict or be inconsistent with CEQA Guidelines section 15064.3(b).

7-27 Average Daily Trips for Buildout to General Plan: 9.43 X 35 = 330. Buildout Pursuant to General Plan does not exceed the total daily VMT generated by the City of Elk Grove nor the cumulative General Plan Buildout VMT limit. We believe this impact is less than significant (not significant and unavoidable).

Section 4.5.2 Existing Environmental Setting

Off-Site Improvement Areas The Project would trigger the need for off-site roadway improvements. Specifically, the Project would require improvements to the existing roundabouts at the Sheldon Road/Waterman Road and Sheldon Road/Bradshaw Road intersections.

7-28 Additional off-site improvements include the construction of approximately 6,500 linear feet of off-site four- to six-inch diameter force mains in Sheldon Road and Elk Grove Florin Road to support the Project, as well as the extension of water mains to either connect to an existing main in Waterman Road or near Elk Grove Florin Road. The foregoing off-site improvement areas would primarily be within existing disturbed areas and/or within existing roadway rights-of-way (ROW); however, depending on the chosen alignment of the water line connection, a water main extension along the Project's Sheldon Road ROW may be required, which would include a crossing either under Laguna Creek or attached to the existing Sheldon Road Bridge over Laguna Creek.

7-29 **ISSUE**: Throughout the Draft EIR impact analysis, these environmental intrusions are glossed over and treated as less than significant. We cannot think of a more appropriate use of the designation "significant and unavoidable"! These impacts must be spelled out and highlighted for what they are: significant and unavoidable.

7-30 **ISSUE**: Buildout Pursuant to General Plan Alternative would not require these on- and off-site environmental intrusions and the impact would be N/A. The Draft EIR should clearly reflect this fact.

Letter 7 Cont.

11/24/25, GSREHA's Summer Villas SPA DEIR response

Chapter 7 – Alternatives Analysis

We take issue with the Alternatives Analysis.

7-31 Per CEQA Guidelines Section 15126.6, an EIR shall describe a range of reasonable alternatives to 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. The EIR must consider a reasonable range of alternatives that will foster informed decision-making and public participation.

ISSUE: Per CEQA Guidelines Section 15126.6, there is no provision for multiple "No Project" Alternatives. The No Project (Buildout Pursuant to General Plan) Alternative should be renamed to Buildout Pursuant to General Plan Alternative and be evaluated on its comparative merits, including:

7-32
- Per the DEIR, meets Project Objectives #5, #6, #7, and #8. (After our stated Project Objective issues and comments are considered, this Alternative will meet none of the Project Objectives.)
- Has no significant and unavoidable issues.
- Requires no significant and unavoidable on- and off-site improvements.
- Is compatible with the surrounding RR community, requires no rezone, and requires no General Plan amendments.
- The Project site has been considered during two General Plan updates and one, previously approved, subdivision map. All environmental issues were analyzed with the current land use designation of RR.

ISSUE: The Aquatic Resource Avoidance Alternative should be evaluated honestly and fairly on its comparative merits, including:

7-33
- Per the DEIR, meets Project Objectives #1 and #3-8. (After our stated Project Objective issues and comments are considered, this Alternative will meet only Project Objectives #1 and #3.)

7-34
- All eight significant and unavoidable issues are applicable.

7-35
- Requires significant and unavoidable on- and off-site improvements.

7-36
- Is not compatible with the surrounding RR community, requires rezone, and requires General Plan amendments.

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Letter 7 Cont.

11/24/25, GSREHA's Summer Villas SPA DEIR response

7.4 Environmentally Superior Alternative

We take issue with selection of the Environmentally Superior Alternative

7-37 In keeping with the letter and spirit of CEQA, an EIR is required to identify the Environmentally Superior Alternative from among the range of reasonable alternatives that are evaluated. The Environmentally Superior Alternative is generally the alternative that would be expected to generate the least amount of significant impacts.

7-38 **ISSUE**: The 4th paragraph of the analysis begins with "Based on the above". The "above" analysis does not consider the No Project (Buildout Pursuant to General Plan) Alternative. Determination of the Environmentally Superior Alternative only considers No Project (No Build) and Aquatic Resource Avoidance Alternatives. Evaluating only two out of three alternatives is intentionally misleading. Identification of the Environmentally Superior Alternative must be re-analyzed.

Letter 7 Cont.

11/24/25, GSREHA's Summer Villas SPA DEIR response

Table 7-2 Comparison of Environmental Impacts for Project Alternatives

7-39 **ISSUE:** Using the DEIR "Fewer", "Similar", and "bold" indicators, No Project (Buildout Pursuant to General Plan) Alternative table entries and Aquatic Resource Avoidance Alternative table entries require correction based on the above identified issues and comments.

7-40 **ISSUE:** The use of 'bold' to indicate an impact is Significant and Unavoidable is extremely misleading. Where applicable, "Significant and Unavoidable" should be spelled out. "Similar" and "Fewer" does not mean the same.

	No Project (Buildout Pursuant to General Plan) Alternative	**Aquatic Resource Avoidance Alternative**
Impact 4.1-1	Fewer	~~**Fewer**~~ **Similar**
Impact 4.1-3	Fewer	~~**Fewer**~~ **Similar**
Impact 4.1-4	Fewer	~~**Fewer**~~ **Similar**
Impact 4.2-7	~~**Similar**~~ Fewer	**Similar**
Impact 4.3-1 - 4.3-12	~~Similar~~ Fewer	Fewer
7-41 Impact 4.4-2	~~Similar~~ Fewer	Fewer
Impact 4.4-3	~~Similar~~ Fewer	Fewer
Impact 4.5-3	~~Similar~~ Fewer	Fewer
Impact 4.5-4	~~Similar~~ Fewer	Fewer
Impact 4.8-3	Fewer	~~**Fewer**~~ **Similar**
Impact 4.8-5	Fewer	~~**Fewer**~~ **Similar**
Impact 4.9-1	Fewer	~~**Fewer**~~ **Similar**
Impact 4.11.1 - 4.11-3	~~Similar~~ Fewer	Similar
Impact 4.11-4	Fewer	**Similar**

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LETTER 7: GREATER SHELDON ROAD ESTATES HOMEOWNERS ASSOCATION

Response to Comment 7-1
The comment is an introduction statement.

Response to Comment 7-2
An analysis of the impacts that were determined to remain significant and unavoidable under the No Project (Buildout Pursuant to General Plan) Alternative is provided on pages 7-11 through 7-14 in Chapter 7, Alternatives Analysis, of the Draft EIR. While an effort has been made to include quantitative data for certain analytical topics, where possible, qualitative comparisons of the various alternatives to the Project are primarily provided. Such an approach to the analysis is appropriate as evidenced by CEQA Guidelines Section 15126.6(d), which states that the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the Project as proposed.

Response to Comment 7-3
Please see Response to Comment 7-2.

Response to Comment 7-4
Please see Master Response 3.

Response to Comment 7-5
Please see Master Response 3. In addition, pursuant to CEQA Guidelines Section 15124, a clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. Thus, the selection of alternatives is based on the alternative's ability to meet the basic objectives of the Project. Furthermore, pursuant to CEQA Guidelines Section 15124, the statement of objectives may discuss the project benefits. As such, preservation of open space would be considered a benefit of the Project, and may be included as an objective sought by the Project applicant. Lastly, as discussed in Chapter 7, Alternatives Analysis, of the Draft EIR, Objectives #4, #5, and #6 would be satisfied to a greater extent under the Aquatic Resources Avoidance Alternative, as the Alternative would further preserve existing aquatic resources, natural habitat, and open space through increased clustered development.

Response to Comment 7-6
The list of significant impacts that would be reduced under each Alternative within Chapter 2, Executive Summary, specifically states which would remain significant and unavoidable. As stated on page 7-7 in Chapter 7, Alternatives Analysis, of the Draft EIR, the reader should not necessarily equate fewer impacts to elimination of significant impacts identified for the Project. For example, in many cases, an alternative would reduce the relative intensity of a significant impact identified for the Project, but the impact would still be expected to remain significant under the alternative, thereby requiring mitigation.

Response to Comment 7-7
The list of impacts on pages 2-6 through 2-8 is a list of the significant impacts that would be reduced under the Aquatic Resources Avoidance Alternative. As shown in Table 7-2 in Chapter

7, Alternatives Analysis, of the Draft EIR, Impacts 4.2-7 and 4.11-4 would not be reduced under the Aquatic Resources Avoidance Alternative. Thus, Impacts 4.2-7 and 4.11-4 are not included in the list referenced by the commenter.

Response to Comment 7-8

Please see Response to Comment 7-6. Furthermore, as shown in Table 7-2 in Chapter 7, Alternatives Analysis, of the Draft EIR, the significant and unavoidable impacts related to Air Quality, Greenhouse Gas Emissions, and Energy and Transportation would remain similar under the Aquatic Resources Avoidance Alternative as compared to the Project.

Response to Comment 7-9

Please see Master Response 3.

Response to Comment 7-10

The project objectives were developed by the applicant and approved by the City. Pursuant to CEQA Guidelines Section 15124, a clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project and may discuss the project benefits. As such, the overall purpose of the project to develop an active adult and senior living community with preservation of open space is stated in Objective #1.

Response to Comment 7-11

Please see Responses to Comments 7-5 and 7-10. Nonetheless, revisions to the list of objectives sought by the Project applicant would not affect the analysis or conclusions of the Draft EIR. The comment will be forwarded to the decision-makers for their consideration of the Project.

Response to Comment 7-12

Please see Response to Comment 7-11.

Response to Comment 7-13

Please see Response to Comment 7-11.

Response to Comment 7-14

As discussed throughout the Draft EIR, the Project would include single-unit residences that are restricted to those 55 and older within two Active Adult Neighborhoods. Furthermore, the definition of the word “senior” is not specifically limited to those 65 and older. Pursuant to California Civil Code Section 51.3, “qualifying resident” or “senior citizen” means a person 62 years of age or older, or 55 years of age or older in a senior citizen housing development. Nonetheless, Objective #3 would remain appropriate, as senior rural residents would be anticipated to be future residents of the Project, and removing any references to senior housing would not change the analysis or conclusions of the Draft EIR.

Response to Comment 7-15

As discussed on page 3-5 in Chapter 3, Project Description, of the Draft EIR, in order to preserve the natural features and open space resources existing within the SPA boundaries, the Project may cluster residences beyond the 7.0 du/ac density maximum consistent with General Plan Policy NR-1-9 and General Plan Goal NR-1, which allow such clustering to protect wetlands,

stream corridors, scenic areas, or other natural features as open space. Clustering would allow development to exceed the density within the East and West Neighborhoods, provided the overall density would not exceed the range allowed by the General Plan for the Low Density Residential (LDR) land use designation (4.1 to 7.0 dwelling units per acre). Approximately 349 units would be located in the East Neighborhood (40 acres) and 150 units would be located in the West Neighborhood (31.3 acres), resulting in an overall density of approximately 4.3 du/ac over the 225.9-acre site. While the density may be exceeded when considering only the East Neighborhood, clustering units in the East Neighborhood area is necessary in order to preserve the natural on-site resources and the overall density is within the range allowed by the General Plan for the LDR land use designation. The SPA is also subject to an overall maximum of 499 units.

Response to Comment 7-16

Please see Response to Comments 7-5 and 7-11.

Response to Comment 7-17

Please see Response to Comments 7-5 and 7-11.

Response to Comment 7-18

Please see Response to Comment 7-11.

Response to Comment 7-19

Please see Response to Comments 7-5 and 7-11. In addition, as discussed in Chapter 4.8, Land Use and Planning/Population and Housing, the City's planned development of the site is indicative that the site has been envisioned as an extension of the existing surrounding residential uses. Furthermore, the proposed residential uses and open space areas associated with the Project would be consistent with the low-density residential uses, including age-restricted units, and the open space areas associated with the Elliot Springs Subdivision located to the southwest of the site.

Response to Comment 7-20

As discussed on page 7-11 in Chapter 7, Alternatives Analysis, of the Draft EIR, the No Project (Buildout Pursuant to General Plan) Alternative would result in a reduction in the intensity of the impact related to the substantial degradation of the existing visual character or quality of public views of the site and its surroundings, and to long-term changes associated with cumulative development of the City. However, because mitigation to reduce impacts related to visual character of the site is not feasible, the impact would still be significant and unavoidable. Nonetheless, the Draft EIR concluded that the magnitude of impacts related to Aesthetics would be reduced (fewer) as compared to the Project.

Response to Comment 7-21

The Draft EIR concluded that the No Project (Buildout Pursuant to General Plan) Alternative would produce less light and glare than the Project, and the Alternative would result in a lesser impact related to the creation of a new source of substantial light or glare which would adversely affect day or nighttime views in the area and associated with cumulative development of the City. However, Mitigation Measures 4.1-3 and 4.1-5, requiring a lighting plan and photometric plan on residential lighting, would still be required. Nonetheless, similar to the Project, the required plans would not be able to adequately address the potential for future homeowners to install individual lights that could conflict with the City's standards. Due to the uncertainties related to future



residential lighting and the ultimate level of illumination in the area, the impact was determined to remain significant and unavoidable.

Response to Comment 7-22

Please see Response to Comment 7-20. In addition, as discussed in Chapter 4.1, Aesthetics, of the Draft EIR, the City's General Plan EIR evaluated long-term changes in visual character associated with cumulative development and concluded that, although individual development projects would incorporate mitigation to minimize project-specific visual impacts, the net result would be a general conversion of areas with an open, rural character to a more urban and developed character. Therefore, the City's General Plan EIR concluded that changes in character associated with such development would result in a significant cumulative impact. Compliance with the City's Design Guidelines, supplemental guidelines, and General Plan policies would ensure the visual character of future projects is consistent with the City's applicable standards; however, even with implementation of such guidelines and policies, future development would substantially change the visual character of the City's planning area. Therefore, feasible mitigation was not available to reduce the cumulative impact identified by the City's General Plan EIR, and such impacts were determined to be significant and unavoidable. Therefore, impacts related to long-term changes associated with development of the No Project (Buildout Pursuant to General Plan) in combination with future buildout of the City would similarly remain significant and unavoidable.

Response to Comment 7-23

The City of Elk Grove Climate Action Plan (CAP) provides goals and associated measures, also referred to as GHG reduction strategies, intended to ensure achievement of considerable GHG reductions in the short- and long-term and consistency with State GHG reduction targets and goals. The CAP used the City's General Plan land use designations to inventory GHG emissions associated with the land uses within the City's jurisdictional boundary, which was used to inform the reduction targets of the CAP. Thus, emissions associated with development of the site pursuant to the existing RR land use designation were accounted for in the CAP's GHG emission inventory and were therefore considered in the overall reduction target. However, the Alternative, as well any other development consistent with the existing land use designation, would still be required to comply with the reduction strategies and implementation measures included in the CAP. As such, a CAP consistency analysis was conducted for the No Project (Buildout Pursuant to General Plan) Alternative in Chapter 7, Alternatives Analysis, of the Draft EIR. As discussed therein, the Alternative could conflict with Measure TACM-6 of the City of Elk Grove CAP, and Mitigation Measure 4.2-7(c) would still be required. Similar to the Project, due to uncertainties regarding the effectiveness of the required mitigation measures, the Alternative's impact would remain cumulatively considerable and significant and unavoidable.

Response to Comment 7-24

The commenter inaccurately summarizes the conclusions of the Draft EIR related to the No Project (Buildout Pursuant to General Plan) Alternative's potential impacts related to population. Pages 7-13 and 7-14 in Chapter 7, Alternatives Analysis, of the Draft EIR state the following:

> Because the No Project (Buildout Pursuant to General Plan) Alternative would entail buildout of the site with RR uses and would remain consistent with the General Plan, the population increase projected through buildout of the site was anticipated by the City of Elk Grove as part of adoption of the General Plan. Thus, the Alternative would not induce substantial unplanned population growth either directly or indirectly, and would not result in cumulative unplanned population growth. Therefore, the significant and unavoidable and

> cumulatively considerable and significant and unavoidable impacts identified for the Project would not occur under the Alternative. Overall, impacts related to Land Use and Planning/Population and Housing under the No Project (Buildout Pursuant to General Plan) Alternative would be fewer than impacts under the Project.

Based on the above, the Draft EIR reached the same conclusion noted by the commenter and concluded that impacts related to population growth would be reduced to less than significant levels under the No Project (Buildout Pursuant to General Plan) Alternative.

Response to Comment 7-25

Please see Response to Comment 7-24.

Response to Comment 7-26

The commenter inaccurately summarizes the conclusions of the Draft EIR related to the No Project (Buildout Pursuant to General Plan) Alternative's potential impacts related to off-site construction noise. Page 7-14 in Chapter 7, Alternatives Analysis, of the Draft EIR states the following:

> […] However, because the No Project (Buildout Pursuant to General Plan) Alternative would not include development of the off-site utility and roadway improvements, temporary noise increases associated with off-site construction would not occur. Therefore, Mitigation Measure 4.9-1(b) would not be required under the Alternative. Overall, impacts related to Noise under the No Project (Buildout Pursuant to General Plan) Alternative would be fewer than the Project, and the significant and unavoidable impact related to off-site construction noise would be eliminated.

Based on the above, the Draft EIR reached the same conclusion noted by the commenter.

Response to Comment 7-27

Page 7-14 in Chapter 7, Alternatives Analysis, of the Draft EIR states the following:

> Due to the reduction in the number of units and, thus, the associated vehicle trips, the overall VMT associated with the Alternative would be reduced as compared to the Project. In addition, because the Alternative would be consistent with the existing General Plan land use designation, the VMT under the Alternative would be consistent with the VMT anticipated and analyzed in the General Plan EIR. As such, the Alternative would not cause the cumulative daily total VMT within the City to exceed the cumulative General Plan Buildout VMT limit. However, although the Alternative would involve a similar vehicle trip length as the Project, because the Alternative would not include development of age-restricted units, the daily vehicle trip rate would be higher under the Alternative. As a result, the daily VMT per capita would be greater than the Project. Thus, similar to the Project, the Alternative would still be expected to exceed the per capita Project-level VMT per service population limit. Therefore, the Alternative would result in a similar impact related to VMT (i.e., conflicting with CEQA Guidelines Section 15064.3, subdivision (b)). The impact would remain significant and unavoidable, and Mitigation Measure 4.11-4 would still be required.

Based on the above, the Draft EIR concluded that the No Project (Buildout Pursuant to General Plan) Alternative would not exceed the cumulative General Plan Buildout VMT limit, consistent with the assertion of the commenter. However, the potential impact was determined to remain significant and unavoidable because per capita VMT would not be reduced under the Alternative.

Response to Comment 7-28
The comment is a summary of the proposed off-site improvements.

Response to Comment 7-29
The Draft EIR thoroughly considered the potential environmental impacts of the proposed off-site improvements, and a discussion of such potential impacts is provided within each impact analysis throughout the Draft EIR.

Response to Comment 7-30
As clearly stated on page 7-10 in Chapter 7, Alternatives Analysis, of the Draft EIR, the proposed off-site improvements to provide water and sanitary sewer service to the Project would not be required under the No Project (Buildout Pursuant to General Plan) Alternative, as the proposed residences would be serviced by water wells and septic systems. In addition, off-site roadway improvements would not be required under the Alternative, as the Sheldon Road/Waterman Road and Sheldon Road/Bradshaw Road roundabouts are currently adequately sized for development of the site with RR uses. The analysis of potential impacts associated with the No Project (Buildout Pursuant to General Plan) Alternative therefore considered the elimination of the off-site improvements.

Response to Comment 7-31
The comment is a summary of the CEQA Guidelines and does not directly address the adequacy of the Draft EIR.

Response to Comment 7-32
Please see Master Response 3 and Responses to Comments 7-11, 7-20 through 7-23, and 7-27.

Response to Comment 7-33
Please see Master Response 3.

Response to Comment 7-34
Please see Master Response 3.

Response to Comment 7-35
Please see Master Response 3.

Response to Comment 7-36
Please see Master Response 3.

Response to Comment 7-37
Please see Master Response 3.

Response to Comment 7-38
Please see Master Response 3.

Response to Comment 7-39
Please see Response to Comment 7-6.

Response to Comment 7-40

Please see Response to Comment 7-6.

Response to Comment 7-41

As noted in the above responses to comments, sufficient justification does not exist for the recommended revisions.

Letter 8

Amelia Vankeuren, PhD
Professor of Geology, Sacramento State University
Rural Area resident
9187 Sheldon Road
Elk Grove, CA 95624
Cell: 707-280-1403
Email: Vankeuren@csus.edu

November 24, 2025

Dear Elk Grove Planning Commission,

8-1 I am writing in response to the Draft Environmental Impact Report for the proposed Summer Villas Special Planning Area ("Project"). My family lives within the Elk Grove Rural Area and I am a Professor of Geology at Sacramento State University with a specialty in groundwater resources. I have several concerns regarding the draft EIR:

8-2 1) The project should not be allowed to reduce groundwater recharge onsite as that will reduce the water available to Rural Area residents in our wells. There needs to be a quantitative assessment of the fraction of precipitation that will infiltrate onsite after the project in comparison to current infiltration levels.

8-3 The draft EIR concludes that groundwater recharge will not be affected because low impact stormwater development (LID) controls will be used to manage stormwater runoff, and that the runoff that does go to Laguna Creek can infiltrate through the permeable riverbed. However, there is no guarantee that the combination of LIDs and impermeable surfaces from the project will generate the same amount of groundwater recharge that is currently occurring on site. The project will build on 71 acres of the 116-acre site, which means over 60% of the land area will become much less permeable if not completely impermeable and prevent infiltration.

8-4 Additionally, runoff from the project site that flows into Laguna Creek may recharge groundwater, but that would happen downstream of the site making the water not available to nearby residents. Residents of the Rural Area, including myself, are all reliant on groundwater for our drinking water and to irrigate our gardens to grow food for our families. We need groundwater recharge *in our area* or upgradient of us in order for it to be available for our use. Recharge that occurs downstream in Laguna Creek will also be downgradient in the groundwater system and thus that water will not be available for us to use. The project will reduce our groundwater supply.

8-5 It is not enough to conclude that groundwater will not affect the South American Subbasin's ability to meet its Groundwater Sustainability Plan as groundwater levels can be impacted locally even if the overall subbasin is sustainable. Modeling for the Groundwater Sustainability Plan indicated that by 2042 groundwater levels in the Rural Area may go down to 15 ft below the 2015 drought's historically low levels due to planned development throughout the subbasin and climate change. This decline in groundwater level will impact Rural Area residents and some may need to lower their groundwater pumps or even deepen their wells in order to maintain water supply. Thus, it is imperative that no additional development, such as the project, further reduce groundwater recharge near the Rural Area.



Letter 8 Cont.

8-6 2) The groundwater levels used in the EIR need to be updated to reflect recent years. The draft EIR considers groundwater levels in a nearby Department of Water Resources monitoring well from the years 1990-2010. There are several wells nearby with records that extend to 2024 that show groundwater levels 10s of feet different than the record cited in the EIR. These wells with more recent groundwater levels should be included in the analysis.

8-7 3) The project is designed to avoid building within the 100-year floodplain, but the frequency and severity of storms is increasing with climate change so 100-year floods will get worse with time. Since 2007, California has prohibited urban development within the 200-year floodplain. This project should follow the same guidance and not build within the 200-year floodplain. The project as proposed is not even designed to avoid the stronger 100-year floods of the next several decades.

8-8 4) The draft EIR does not consider the availability of public transportation at the project site. It requires the construction of a bus shelter as a mitigation measure, but that won't help because currently no bus lines run within a mile of the property.

8-9 Additionally, the shoulder on Sheldon Road is not wide enough to accommodate a bus stop. On this 2-lane road it would be very disruptive to traffic to have a bus stop that which would entirely stop the flow of traffic in one direction.

8-10 5) Providing the project with city sewer and water will be highly disruptive and have a significant negative impact on the rural area. Installing water mains and sewer lines under the roadway will require a mile of conveyance either to the north or west, likely necessitating changes to the roadway that are not consistent with the Rural Area road standards as defined in the Elk Grove General Plan.

The water and sewer lines will need to cross Laguna Creek, putting the creek at risk of contamination during the building process, or from later leakage within the sewer line.

8-11 6) The increase in traffic due to an additional 499 homes with an estimated 1.5 cars/home will be intolerable on our Rural Area roads. Traffic congestion will be significantly worse. This traffic will overwhelm the local roundabouts at the corner of Sheldon Rd and Waterman and Bradshaw. Traffic already backs up for up to a mile behind the roundabouts since many drivers do not know how to properly drive through them. Adding an additional lane to enter the roundabout as described in the draft EIR will not solve the problem.

8-12 7) The significant and unavoidable impacts on the aesthetics of the Rural Area are unacceptable. The project would be completely incompatible with surrounding land use. All nearby houses are on 2-acre or larger parcels in accordance with the Rural Area standards set forth in the Elk Grove General Plan. The Rural Area is critical for preserving a rural farming and ranching lifestyle and protecting the land from more dense development. The importance of maintaining the Rural Area was codified in the Elk Grove General Plan and the need to protect the agricultural and rural heritage of Elk Grove has only grown as development continually expands and paves over open land.

The ability to provide my children with a rural upbringing is the reason my husband and I purchased a house within the Elk Grove Rural Area seven years ago. My children are learning responsibility by tending our garden, collecting eggs, feeding and watering our livestock, and growing to be healthy and happy by riding horses and enjoying the outdoors.

Letter 8 Cont.

8-13

My family deeply values being able to live in close contact with nature and see both wild and farm animals in the Rural Area when we go for walks and bike rides around our house.

I grew up on a 10-acre farm in the Napa Valley where I raised horses, pigs, and chickens, and grew and sold pumpkins. This rural lifestyle taught me responsibility, a work ethic, and hands-on skills like equipment repair. I was also a California State 4-H All-Star, where I learned leadership, public speaking, and community service. My rural childhood is in large part why I am now a professor working to educate the next generation and to protect our local groundwater supply and water quality. My children too are now in 4-H and I hope that they experience the same benefits I did, but in order for that to happen, the Rural Area must be preserved.

Thank you for your consideration.
Sincerely,

Amelia Vankeuren, PhD and family

LETTER 8: AMELIA VANKEUREN

Response to Comment 8-1

The comment is introductory and does not specifically address the adequacy of the Draft EIR. The comment has been noted for the record and will be forwarded to the decision-makers.

Response to Comment 8-2

Appendix G of the CEQA Guidelines evaluates potential impacts related to groundwater supply as related to whether a development project would "substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin or conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan." As such, the focus of CEQA is related to how a project may impact the larger groundwater basin and groundwater sustainability plans.

The Draft EIR includes a qualitative assessment of groundwater recharge under Impact 4.7-3. As discussed therein, although the future development of the Project would include the addition of new impervious surfaces, the Project would not include any development within the channel of Laguna Creek tributaries and would ultimately convey on-site flows into Laguna Creek through the project drainage system. Therefore, infiltration of water moving through Laguna Creek would continue to occur and contribute to groundwater recharge. In addition, the proposed bioretention basins and LID control features incorporated into the Project design would promote on-site stormwater infiltration. Overall, development of the Project would provide opportunities for groundwater recharge and, thus, would result in a less-than-significant impact.

Response to Comment 8-3

The applicable CEQA threshold of significance related to groundwater recharge is not whether a constructed project would generate the same amount of groundwater recharge as pre-construction conditions, but whether a project would interfere substantially with groundwater recharge such that sustainable groundwater management of the basin is impeded or implementation of a sustainable groundwater management plan is conflicted with or obstructed. The foregoing evaluation is included within Impact 4.7-3 of the Draft EIR.

In addition, the increase in on-site impervious surfaces associated with the Project is acknowledged on page 4.7-23 of the Draft EIR. Specific Project development plans have not yet been submitted; however, the developable areas associated with the site would not be completely covered by new impervious surfaces. For example, the residential areas would include pervious landscaped areas, and the Project would also include the drainage features mentioned by the comment. The proposed bioretention basins would include plants, engineered soil, and filter media designed to capture, treat, and infiltrate stormwater runoff from impervious surfaces, thereby promoting on-site groundwater recharge.

Response to Comment 8-4

Please see Response to Comment 8-3 above. The Draft EIR concluded under Impact 4.7-3 that stormwater from the site would continue to replenish groundwater through percolation into soils within Laguna Creek and that the Project would not create a conflict with, or impede the implementation of, a sustainable groundwater plan. Thus, impacts related to groundwater would be less than significant.

In addition, the Project is not proposing any on-site water supply wells, but would be provided domestic water service by the Elk Grove Water District (EGWD) and the Sacramento County Water Agency (SCWA). EGWD has maintained a long-standing agreement with SCWA to purchase additional surface water supplies.

Because groundwater flow moves downslope or downgradient, under current conditions, any groundwater recharge associated with the site would not provide supply for any upgradient water supply wells in the vicinity. In addition, pursuant to Mitigation Measure 4.7-4 included in the Draft EIR, the Project applicant shall submit, for review and approval, a design-level drainage report ensuring that post-project peak flows are equal to or less than pre-project peak flows; thus, the Project would not change the amount of recharge currently associated with the site or the groundwater availability at any nearby wells. Overall, the Project would not reduce groundwater supplies nor affect the supply of any wells surrounding the site.

Response to Comment 8-5

Please see Response to Comment 8-2 above. As discussed therein, Impact 4.7-3 adequately discusses groundwater supply, which the CEQA Guidelines establishes is related to whether a project would interfere substantially with groundwater recharge such that sustainable groundwater management of the basin is impeded or implementation of a sustainable groundwater management plan is conflicted with or obstructed. Because the Project would not affect the South American Subbasin or associated groundwater management plan, the conclusions of the Draft EIR are consistent with the CEQA thresholds.

Response to Comment 8-6

Please see Responses to Comments 8-2 and 8-5. In addition, even if groundwater levels are different than discussed within the Draft EIR, the Project would connect to existing EGWD/SCWA infrastructure for domestic water supply. Therefore, the Project would not affect existing surrounding water wells.

Response to Comment 8-7

As discussed under Impact 4.7-5 of the Draft EIR, portions of the site surrounding the on-site tributaries of Laguna Creek are designated by the Federal Emergency Management Agency (FEMA) as Zone AE with base flood elevations (BFEs) ranging between 51 and 53 feet. The Project includes the Laguna Creek Open Space area to encompass the 100-year floodplain within a 100-foot setback. The remainder of the site is designated by FEMA as Zone X, an area of minimal flood hazard.

Along with other related legislation, SB 5 established a mandate for local governments to amend their general plans and zoning codes to be consistent with State law on floodplain management. A project would be subject to the requirements of SB 5 if the project meets five criteria related to project location. As discussed on page 4.7-11 of the Draft EIR, because the on-site elevation ranges from 50 to 75 feet above mean sea level (amsl), flood depth at the site would not exceed three feet. Therefore, the Project would not meet criterion 4 under SB 5 and the Project would not be subject to the flood protection requirements of SB 5. Furthermore, in response to SB 5, the City adopted EGMC Chapter 16.50, Flood Damage Prevention, which includes specific standards for subdivisions. Such standards include, but are not limited to, identifying on-site SFHAs and BFEs, construction specifications for buildings within SFHAs, requiring utility lines to be located and constructed to minimize flood damage, requiring subdivisions to provide adequate drainage, and, in cases where the use of fill is required, requiring no net increase to water surface

elevations. Future on-site development is anticipated to occur outside of the Special Flood Hazard Area (SFHA) limits.

Response to Comment 8-8

Page 4.11-22 of the Draft EIR acknowledges that service is not currently provided in the immediate Project vicinity and that the lack of any existing or planned fixed-route bus service to the area would lead to an unmet demand for transit service. In order to address the identified impact, the Draft EIR notes that the Project applicant may choose to coordinate with the City to create a Communities Facilities District (CFD) to fund transit improvements, or may choose to deposit a sum of money to fund the Project's fair share portion of such costs. Such funding would be determined by the City and would address the extension of transit service to the Project. Mitigation Measures 4.11-4 related to the CFD and 4.11-3(b) related to payment of the City's Capital Facilities Fee for Transit are consistent with City policy.

Response to Comment 8-9

As discussed throughout the Draft EIR, site-specific details, such as development proposals, are not available at this time. Mitigation Measure 4.11-3(b) of the Draft EIR requires that any subsequent Tentative Subdivision Map be conditioned to construct one or more bus stops with shelters within the Project for access to transit services. Such facilities would be constructed as part of the corresponding civil improvement plans, which would include any required roadway improvements. In addition, the maps would also be reviewed by the City prior to approval and subject to all applicable roadway design standards.

Response to Comment 8-10

The potential impacts associated with the extension of sewer and water lines, including the crossing of Laguna Creek tributaries, are evaluated throughout the Draft EIR. As noted on page 4.10-26 of the Draft EIR, all new water infrastructure would be designed consistent with the applicable standards within the City's Standard Construction Specifications and, thus, would be consistent with the standard specifications of SCWA. As such, all water utility improvements would be required to comply with SCWA standards, State codes, and City construction specifications.

Similarly, all new wastewater conveyance infrastructure would be designed consistent with the applicable SacSewer standards and specifications, ensuring the new sewer lines are constructed in conformance with proper materials and sizing (thereby preventing leaks from occurring once installed). The new lines would be installed within existing ROWs, which would not include substantial changes to the roadways.

Response to Comment 8-11

Please see Master Response 2.

Response to Comment 8-12

CEQA is focused on the potential physical environmental effects of a project; the compatibility of a project with surrounding land uses is ultimately the decision of the lead agency (in the case of the Project, the City of Elk Grove). Please see Master Response 1. In addition, as discussed under Impact 4.8-1 of the Draft EIR, the proposed residential uses and open space areas associated with the Project would be consistent with the low-density residential uses and the open space areas associated with the Elliot Springs Subdivision located to the southwest of the site. Therefore, impacts would be less than significant.

With respect to the Rural Area standards referenced by the comment, page 4.8-15 of the Draft EIR includes the following:

> While the site is located within the Rural Area Community Plan area, the policies for the Community Plan area are intended to recognize and support the continuation of the rural lifestyle and agricultural heritage necessary to preserve the character of the area. As such, the Rural Area Community Plan policies are not adopted for the purpose of avoiding or mitigating an environmental effect. Pursuant to the court ruling in *Preserve Poway v. City of Poway* (2016) 245 Cal.App.4th 560 576-582, psychological and social impacts are not considered significant effects on the environment and, thus, are not a CEQA issue. However, the City Council may consider such policies in their deliberations on the Project, separate from the CEQA document.

The comment has been noted for the record and will be forwarded to the decision-makers.

Response to Comment 8-13

Please see Master Response 1.

Letter 9

[EXTERNAL EMAIL]
Greetings, Kyra-

It was a pleasure to meet you at the Elk Grove Planning community meeting last week, on Nov. 13. My husband and I are 28 year residents of Rubia Drive.

9-1 Listed below are some of the concerns I have regarding the proposed Summer Villa Project and its Draft EIR Report at Waterman/Sheldon Road in Elk Grove.

1. Water supply: Where is all of the water supply going to come from? This project proposes 499 new units with 2-4 people in each unit, landscaping, walking trails, parks, and swimming pools at the clubhouses. Will there be a new deep well dug for this? Or will it tie into an existing main water line? If so, where is this existing line located? If it will be a new well, that will have a direct impact on all of the wells in the Greater Sheldon Estates area. We cannot allow another large deep well into our aquifer without a detailed study on how it will affect existing users. When our water supply is exhausted, or when the water table level falls too low, we may not be able to get any water at all.

9-2

2. Sewer: Where is the existing sewer line that you plan on tapping into? Will it require any new sewer lines to be installed on Sheldon Rd? How will this construction be accomplished? Also, if there is a new sewer line on Sheldon Rd, will that have any impact on existing homeowners? Will the city require me to utilize this line if and when I need to replace my septic system?

9-3
9-4
9-5

3. Traffic: Sheldon Rd and Waterman Rd are simply not designed for the amount of traffic this project will generate and add to the existing traffic. These roads are country roads. There are no sidewalks, shoulders, curbs, street lights, or traffic lights. When I run along Waterman Rd, there are always new tire marks in the dirt along the road, or somebody's front fence is taken out, or there are new skid marks in the round-about. City drivers just don't have the respect and patience to navigate country roads safely. Also, it is already difficult to turn onto Sheldon coming out of any of the side streets between Waterman and Elk-Grove Florin. This will make it increasingly difficult, especially during commute hours. In addition, the 3 new entry roads into the Summer Villas off of Sheldon east of Waterman will be right in the way of traffic exiting the current round-about. There will be significant congestion right in that area, with cars exiting the round-about, westbound cars on Sheldon making a left turn into the Summer Villas, excessive medical transport and rideshare vehicles for the elderly

9-6

Letter 9 Cont.

9-6 Cont.

community and cars exiting the Summer Villas either trying to turn left or right, and just normal traffic on Sheldon, again especially during commute hours.

9-7

4. Existing Roundabout at Waterman/Sheldon has been proposed to modify it to mirror the Bradshaw/Sheldon Roundabout to increase traffic flow. The Bradshaw/Sheldon Roundabout is one of the worst Roundabouts I have ever seen. The Bradshaw/Sheldon Roundabout is not large enough to support the speeding cars trying to navigate the short approach into a double lane and then a single lane. We see near miss accidents on a daily basis at this Roundabout. It should have never had 2 lanes anywhere on the circle. They did this because of the minimal right of way access that exists for the traffic circle. BOTH the Bradshaw and the Waterman Roundabouts have had a fatal accidents in the past several years. I think one of the two Roundabouts may have had 2 fatal accidents in the fairly recent years. There has also been fatal accidents on Waterman Road both to the North and the South of the Waterman Roundabout. This has already happened BEFORE all of the new Construction being proposed or any bad weather/visibility issues that come from the upcoming winter tule fog.

9-8

5. There is a significant amount of EXISTING livestock along both Waterman Road and Sheldon Road that are not compatible with a residential development. 499 units is not a small development! There is even more livestock along Bradshaw road as well. If the previous AG-Res development proposal of 30/35- 2 acre parcels was rejected, why on earth should 499 residences be an acceptable alternative? I personally know of over 20 horses, dozens of meat and dairy cattle, dozens of meat goats, grazing goats, dairy goats and sheep, egg layer and meat chickens that reside in the immediate area of the proposed development. None of the livestock are compatible with a non-rural lifestyle, regardless of the size of proposed non-ag units. In addition, the easements surrounding the existing GRESHA estates are for equestrian/pedestrian use ONLY, no motorized vehicles at all are allowed on the existing easements. We have already had livestock (a horse and a cow) actually hit by speeding cars, let alone the fatal vehicle accidents involving drivers on the roundabouts and Waterman Road and Bradshaw Road.

9-9

6. What is being done to mitigate the endangered species Red Fox family and the Swainson's Hawk that live in the entire proposed area along the existing protected wetlands and Laguna Creek? Zero information regarding this matter has been addressed in the Draft EIR.

Letter 9 Cont.

7. Fire/Emergency Evacuation Routes and Impacts. Nothing has been proposed in the Draft EIR to address the impacts on emergency evacuation routes due to flooding or fire. The existing drainage ditches are part of the flooding drainage for the entire existing GRESHEA community. It is not uncommon for the roads to become flooded from excess rain/runoff and the existing system drains into the wetlands and the creeks every winter season. In the event of evacuations from an emergency such as flooding or fire, the existing community will be impacted to a very dangerous level of gridlock with the addition of 499 units and two exit routes.

9-10

I would appreciate commentary from the corresponding agencies for Sacramento County, Air Resources Board, California Wildlife Fish and Game, Department of Water Resources as well as California EPA have to say on all of these water supply/environmental/endangered species wildlife/air quality/water drainage issues.

9-11

In addition to these concerns, this Draft EIR plan violates the existing zoning of AR2 that we fought for and the City of Elk Grove agreed to. The developer knew all of this information on the zoning was when he bought the property. He needs to abide by these zoning requirements and keep the heart of Old Elk Grove rural. The Elk Grove City Council has changed its members from the previous administration that already rejected the 2 acre ag-res proposal.

9-12

The developer tries to sell us on the fact that there will be new parks, walking trails, natural areas, swimming pools and other amenities, but this will be a GATED COMMUNITY. Unless you are living in this community, you will not have access to any of these amenities.

9-13

I would like to request a published/disclosed financial audit of the developers contributions to the members of the city council, including the current mayor. I would like to see transparency in all areas that are a conflict of interest with regards to their political contributions and the proposed development Summer Villa Project.

9-14

Thank you for your time and consideration on these concerning impacts from the proposed project.

Regards.

Angela Giordano
Program Performance Branch Quality Representative
Division of Engineering Services - Office of Program Management

Letter 9 Cont.

Project Management Applications and Support Branch
California Department of Transportation
916-479-1087 cell (usually on silent/please text)

By sending us an email (electronic mail message) or filling out a web form, you are sending us personal information (i.e. your name, address, email address or other information). We store this information in order to respond to or process your request or otherwise resolve the subject matter of your submission.

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LETTER 9: ANGELA GIORDANO

Response to Comment 9-1
The comment is introductory to the remainder of the comment letter and does not address the adequacy of the Draft EIR.

Response to Comment 9-2
Please see Response to Comment 8-4. As discussed therein, the Project is not proposing any on-site wells, but would be provided domestic water service by EGWD and SCWA. EGWD has maintained a long-standing agreement with SCWA to purchase surface water supplies. Therefore, the Project would not reduce groundwater supplies nor affect upgradient areas that supply the wells surrounding the site.

As discussed within Chapter 3, Project Description, of the Draft EIR, the Project would include installation of a 24-inch transmission main within Sheldon Road along the project frontage to the north and would also extend water lines within either Waterman Road or Sheldon Road to provide the necessary looped system to service the Project. 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, approximately 2,800 feet of 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 alternatively, could be attached to a bridge structure over the creek. Figure 3-7 on page 3-15 within Chapter 3, Project Description, of the Draft EIR presents the proposed water system improvements.

Response to Comment 9-3
As noted on page 3-14 of Chapter 3, Project Description, of the Draft EIR, 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.

According to SacSewer, the closest viable force main discharge point is 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.

Response to Comment 9-4
The new sewer force main constructed within Sheldon Road as part of the Project's off-site improvements would not result in impacts to the sewer services provided to existing homeowners. In addition, the signing and traffic control plan required by Mitigation Measure 4.11-1 of the Draft EIR would ensure off-site traffic control devices are reviewed and approved by the City. The construction signing and traffic control plan shall ensure that the performance standards specified in Mitigation Measure 4.11-1 are achieved throughout Project construction, including the off-site sewer infrastructure improvements.

Response to Comment 9-5
Please see Master Response 1. Although the Project would include installation of off-site sewer lines, existing residences would not be required to connect to the new sewer infrastructure. In addition, the City's General Plan prohibits connection of new water and wastewater systems to

areas within the Rural Area Community Plan adjacent to the site. Any such connection to City services would be subject to approval of a General Plan/Rural Area Community Plan Amendment.

Response to Comment 9-6

Please see Master Response 2 related to traffic congestion.

Potential impacts related to increased roadway hazards due to a geometric design feature (e.g., dangerous intersections) are evaluated under Impact 4.11-5 of the Draft EIR within Chapter 4.11, Transportation. As discussed therein, all roadway facilities would also be designed to meet applicable industry standards from Caltrans Highway Design Manual (HDM), the California Manual on Uniform Traffic Control Devices (CAMUTCD), and the American Association of State Highway and Transportation Officials (AASHTO) A Policy on Geometric Design of Highways and Streets. Each development application would be subject to review and approval by the City, including the Fire District operated by the CCSD, to ensure safe vehicle access is provided, including for emergency vehicles. Based on the foregoing standards, the Project would not increase hazards due to a geometric design feature, including any existing hazardous conditions associated with the roundabout.

Response to Comment 9-7

Please see Master Response 1. The comments on the nearby roundabout have been noted and will be forwarded to the decision-makers for consideration.

Response to Comment 9-8

Please see Master Response 1. The comments regarding the incompatibility between existing livestock and the proposed residential uses have been noted and will be forwarded to the decision-makers for consideration.

Response to Comment 9-9

Contrary to the comment, Swainson's hawk is discussed throughout Chapter 4.3, Biological Resources, of the Draft EIR. Because the Draft EIR identifies a potentially significant impact related to the suitable Swainson's hawk foraging habitat within the study area, Mitigation Measures 4.3-7(a) includes the species within the requirements and Mitigation Measure 4.3-7(b) is focused entirely on mitigating the potential loss of Swainson's hawk foraging habitat.

With respect to the Sierra Nevada red fox, the records of the CDFW-maintained CNDDB return that 23 special-status plant species have the potential to occur on or within five miles of the study area, seven of which have actually been documented within five miles of the study area. The Sierra Nevada red fox was not identified in the CNDDB records search conducted for the Project and, thus, was not discussed within Chapter 4.3, Biological Resources, of the Draft EIR. Such a finding is consistent with USFWS data, which cites the species as ranging from the Oregon-Washington border to the southern end of the Sierra Nevada.[7] The entirety of the City is located outside of the mapped species range.

Response to Comment 9-10

The potential for the Project to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan is discussed under Impact 4.6-3 of the

[7] U.S. Fish and Wildlife Service. *Sierra Nevada Red Fox.* Available at: https://www.fws.gov/species/sierra-nevada-red-fox-vulpes-vulpes-necator. Accessed December 2025.

Draft EIR. As discussed therein, evacuation planning is managed by the City's participation in the County's Local Hazard Mitigation Plan (LHMP), as well as the City-specific Emergency Operations Plan (EOP). The Project, as designed, would not interfere with or impair implementation of an adopted emergency response or emergency evacuation plan.

Response to Comment 9-11

As discussed in the Introduction and List of Commenters chapter of this Final EIR, the City of Elk Grove received 51 comment letters during the Draft EIR public comment period, including letters authored by State and federal agencies. Such letters and the corresponding responses are included herein as Letters 1 through 4.

Response to Comment 9-12

The property owner is seeking a Rezone, Community Plan Amendment and General Plan Amendment to create a Special Planning Area. The Elk Grove City Council has the authority to approve or deny the Project.

Response to Comment 9-13

Please see Master Response 1.

Response to Comment 9-14

Please see Master Response 1.

Letter 10

From: August Saibeni <august-ann@msn.com>
Sent: Monday, October 27, 2025 10:18 AM
To: Rod Brewer <rbrewer@elkgrove.gov>; Kyra Killingsworth <kkillingsworth@elkgrove.gov>
Subject: Opposition to Summer Villas Project

[EXTERNAL EMAIL]

October 27, 2025

Public Comment on the Draft EIR for Summer Villas SPA (APN 127-0010-077)
To: Councilmember Rod Brewer District 2, City of Elk Grove, CA,
Kyra Killingsworth, Senior Planner, City of Elk Grove
Subject: Opposition to Summer Villas SPA – Significant Unavoidable Impacts and Community Incompatibility

As almost 50 year residents of our area, we are writing to formally oppose the proposed Summer Villas Special Planning Area (SPA) project, as outlined in the Draft Environmental Impact Report (EIR) dated October 10, 2025. The project's location—surrounded by existing 2-acre agricultural-residential homes—makes it fundamentally incompatible with the character, infrastructure, and environmental integrity of the area.

The Draft EIR itself identifies **eight significant and unavoidable impacts**, including:

10-1

- **Visual degradation** in a non-urbanized area (Impact 4.1-1)
- **Substantial light/glare pollution** (Impact 4.1-3)
- **Cumulative loss of rural visual character** (Impact 4.1-4)
- **GHG emissions conflicting with climate policy** (Impact 4.2-7)
- **Unplanned population growth** (Impacts 4.8-3 and 4.8-5)
- **Excessive ambient noise** (Impact 4.9-1)
- **Conflict with CEQA transportation guidelines** (Impact 4.11-4)

These are not minor trade-offs—they represent irreversible damage to the rural fabric of northeast Elk Grove. The SPA's urban-style density and infrastructure demands are antithetical to the surrounding community's scale and land use. The proposed 499-unit age-restricted development would introduce traffic, noise, and environmental strain far beyond what the area was designed to accommodate.

Moreover, the reliance on a **Statement of Overriding Considerations** to justify these impacts undermines the purpose of CEQA. Elk Grove should not override documented harms simply to enable speculative development that erodes long-standing community values.

I urge the Planning Department and City Council to reject the SPA proposal. The project is harmful to the Rural Area Community Plan. Elk Grove's commitment to environmental stewardship and community integrity must not be sacrificed for short-term development gains.

August A. Saibeni
Ann Saibeni
8811 Saint Anthony Ct., Elk Grove, CA 95624

LETTER 10: AUGUST AND ANN SAIBENI

Response to Comment 10-1

Please see Master Response 1.

Letter 11

11-1 I oppose the deceptive practice of allowing urban development to be embedded within a rural community, leading to its destruction and that of its natural surroundings. The city should attempt to preserve the integrity of existing rural communities to avoid losing the city's identity.

Elk Grove was incorporated into a city in 2000 but its rural community history dates to 1850 which shows the many decades & deep roots of its rural character & agriculture. The name is credited to Elk Grove's founder who built a stage stop near a grove of trees where elk passed on their way to the Cosumnes River. The rural area is also identified as Elk Grove's Proud Heritage. However, due to the rise in suburban development & rapid growth in the area & its surroundings, the area's character is changing rapidly as well and will eventually lead to the destruction of its rural character and agriculture if preventive measures are not identified.

11-2 Identifying preventive measures and innovative ways to alter the course of project proposals that are seeking ways to maximize their pockets/revenue streams should be the prime objective. I understand that according to the law, the landowner has the right to propose such changes but that doesn't provide justification to support or allow these alterations to minimize the longevity of these historical legacies in the city, communities and families and frankly it is appalling.

We must do our best to not only preserve & appreciate elk grove's rural community but ensure the protection of nature & rural areas, support and advocate for the rural communities, respect current rural zoned areas and establish grueling processes to demonstrate that to review an amendment request may be extremely challenging. We shall prevent communities from misrepresenting urban sprawl as an opportunity for a mere proximity to rural areas, as this encroachment leads to the destruction of the rural communities, surrounding environments, and natural habits. The rural community is identified with zoning areas & markers to show where the rural area begins. The surrounding communities are greeted with a rural community sign & signs to identify equestrian uses/horseback riding. However, even though we have clear horseback riding signs it is unsafe to foster a strong horseback riding culture. **11-3** The traffic has increased due to the continuous updates of the surrounding areas, it has increased the number of unsafe drivers, added multiple vehicular accidents/fatal accidents to the area and the lack traffic calming measures or rerouting surrounding traffic is non-existent.

11-4 Inserting something that genuinely doesn't belong and trying to design it and sell it to express uniqueness is an insult. Communities designed for 55+ are not unique they are simply another way to introduce senior living at a different level. It promotes a more active lifestyle so it seems more desirable and less costly because the residents are independent and don't require the care & services that an older adult (senior) may require. Senior living seems to promote a less attractive lifestyle, more institutionalized, slower paced, no independence, and costly way to retire due to the additional services required for residents to receive ongoing care & support. Unfortunately, this type of residency is expected to be more attractive to the 55+ buyer.

Letter 11 Cont.

11-4 Cont.

This community design offers a continuous turnover of residents that will impact its facilities, the rural area and agriculture surroundings. 55+ adults are no longer subject to being empty nesters and will have families living with them and introduce more people & vehicles to the area that create immediate impacts, residual impacts long term. Strains to local emergency services and strain the infrastructure that the city cannot meet budget limitations and incompatibility with rural transportation limitations.

11-5

The community is also designed around a creek which will eventually be destroyed. It has a higher risk of pollution, erosion, and damage which may be repaired but will always create human involvement, impacts of human activity & development as opposed to it remaining natural, protected by its natural ecosystems, and providing a vital wildlife habitat. The nature of the creek space should continue to be preserved & protected to allow for the Elk Grove community to enjoy for it and not be closed off for residence to privately enjoy through the means of special roads, private trails & secluded connections from the public. The community is being promoted to provide housing that responds to & accommodates the changes needed for the 55+ community, meanwhile the rural area is not accommodated with these changes and will have an egregious impact to the rural community.

11-6

These residents are expected to have 1 vehicle but, on the contrary, will most likely own multiple vehicles and have multiple vehicles at their residences for household family members, guests or visitors. The community will have limited parking spaces available which will cause overflow to the streets outside of the community and impact to traffic and emergency transport. Also, most of the rural homes have an open design fencing which continues to promote community living & living among nature. Drainage easements for a drainage canal are required therefore no sidewalks are available to allow and maintain water flow. While the 55+ communities' residents require & demand fencing to provide separation and privacy and sidewalks to provide attractive pedestrian connections.

Rural living on the other hand does offer a unique lifestyle, a way of living that is genuine and beautiful to nature and country style living. Something that is simpler, quieter & purposeful for all ages and generations. The rural community has multiple generational families that continuing with protecting and engaging in the rural legacy. The area of Elk Grove has a long history of culture, communities and intentionally distinctive rural character that should be protected by its borders and established zoning areas.

LETTER 11: BRIANNA PASILLAS

Response to Comment 11-1
Please see Master Response 1.

Response to Comment 11-2
Please see Master Response 1.

Response to Comment 11-3
Please see Master Response 2. In addition, existing traffic safety conditions are not required to be analyzed in the Draft EIR. Page 4.11-29 of the Draft EIR includes the following:

> The Project would be constructed in accordance with the City of Elk Grove Improvement Standards and Design Guidelines to ensure that the SPA and future development entitlements public right-of-way and private street improvements are designed to meet or exceed uniform levels of sound engineering practice.[8,9] The design criteria address speed, sight distance, minimum and maximum roadway grade, minimum curve radius, and lighting. As part of general engineering practice, all roadway facilities would also be designed to meet applicable industry standards from the Caltrans Highway Design Manual (HDM), the California Manual on Uniform Traffic Control Devices (CAMUTCD), and The American Association of State Highway and Transportation Officials (AASHTO) A Policy on Geometric Design of Highways and Streets.

The standards listed above would account for roadway safety concerns to the maximum extent feasible. In addition, a roundabout at the intersection of Sheldon Road and Waterman Road currently exists at the northwest corner of the site, which already serves as a traffic-calming measure. The Project would also include the construction of additional traffic-calming measures at the roundabout, including reconfiguring the roundabout into a two-lane circulatory design and widening the approaches to accommodate an additional lane. Widening would be limited to the intersection only, with the two lanes tapering off into one lane.

Response to Comment 11-4
Please see Master Response 1 related to the merits of senior living developments. In addition, based on the analysis within Impacts 4.10-1 through 4.10-5, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental services and/or facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or performance objectives for various public services.

Response to Comment 11-5
The Project includes the 20.3-acre Laguna Creek Open Space area, which is specifically intended to preserve the Laguna Creek corridor and protect on-site wildlife habitat. Further regulation of Laguna Creek would be afforded by the permits required by Mitigation Measures 4.3-10(a) through 4.3-10(c) of the Draft EIR.

The Project would include on-site trails that would connect to the regional trails network in the vicinity of the site, including to the existing and publicly accessible pedestrian facilities at the

[8] City of Elk Grove. *Improvement Standards*. Amended May 28, 2024.
[9] City of Elk Grove. *Citywide Design Guidelines*. October 2021.

northwest corner of the site (see Figure 3-6 of the Draft EIR). The Project would also include a bridge crossing of Laguna Creek to provide access for bicycle and pedestrian on the eastern and western portions of the site.

Potential impacts related to erosion and potential pollution caused by stormwater runoff were addressed in Chapter 4.7, Hydrology and Water Quality, of the Draft EIR. As discussed therein and required by Mitigation Measures 4.7-1, 4.7-2(a), and 4.7-2(b), such impacts would be less than significant.

Response to Comment 11-6

Please see Response to Comment 11-4 above, as well as Master Responses 1 and 2.

The proposed stormwater drainage system improvements would include pipeline infrastructure located under the proposed internal roadway network within a dedicated easement, as well as roadside ditches, drainage basins for storm attenuation, bioretention/LID features, and outfall ditches to Laguna Creek. None of the foregoing improvements include drainage canals that would preclude the construction of sidewalks.

Letter 12

City of Elk Grove

November 13, 2025

Attn: Kyra Killingsworth, Senior Planner

8401 Laguna Palms Way

Elk Grove, CA 95758

RE: Summer Villas Special Planning Area Project, Draft Environmental Impact Report (EIR)

Dear Ms. Killingsworth,

12-1 What follows are my comments regarding the Draft Environmental Impact Report for the Summer Villas Project.

Analysis

12-2 The analysis of the proposed Summer Villas Project and alternatives as to the impacts on the identified environmental issue areas (Aesthetics, Hazards and Hazardous Materials, Noise, Transportation, etc.) is incomplete, as it assigns all issue areas the same weight. The relative importance of issue areas, for example, Aesthetics (which is about beauty) compared to Transportation (which is about time, cost), is not the same. Criteria should be established (e.g., risk to life, direct costs, indirect costs) to evaluate the impacts on each area based on its relative importance to give the reader a more complete understanding of the impact of the project on the community.

Project Objectives

12-3 Section 3 identifies the Project Objectives developed by the Applicant to guide the development of the Summer Villas Project and alternatives. Obviously absent is a Project Objective that speaks to recognizing Elk Grove's proud heritage and agricultural roots as stated on the Elk Grove City website. Something like: "To preserve the rural nature of eastern Elk Grove (the triangle bordered by Elk Grove – Florin, Sheldon, and Grant Line Roads) and its proud heritage consistent with Elk Grove City policies intended to ensure it", would seem to be appropriate.

12-4 Moreover, Project Objective 8. "To be compatible with surrounding land uses through the combination of Low Density Residential (LDR) and Open Space (P/OS) designations on the 115.9-acre site, preserving setbacks and respecting compatibility in structural height" should be removed as it is confusing and self-serving. Respectively, neither the Summer

1

Letter 12 Cont.

12-4 Cont. Villas Project nor the Superior Alternative (Aquatic) are compatible with the project setting and surrounding land use which is 100% agriculture.

12-5 This objective reads more like a project outcome and a high-level description of the Summer Villas Project. It provides no insight into what guided the design of the project solution, alternatives and analysis.

12-6 Moreover, Aquatic may also not meet LDR requirement with its higher unit density on the east side of the project site.

12-7 Finally, the project and alternatives should be scored against the Project Objectives and the Environmental Issue Areas to instill objectivity into the identification and selection of the best alternative, including the current General Plan (Ag Res 2 Acre zoning), for the project site. Please add the current General Plan to the alternative analysis.

Transportation

12-8 The Draft EIR identifies Transportation impact of the Summer Villas and Aquatic projects as Less Than Significant and not worthy of calling out in the Executive Summary.

12-9 The report basically says the adopted project should just be added to the existing transportation plans for the project site.

12-10 Although there will be impacts to Transportation, they are projected to be Less Than Significant because of the type of housing planned and the mitigations identified, namely improved transit and bicycle infrastructure improvements, outreach to the community to encourage less vehicle dependence, and establishing a Community Facilities District (CFD) to fund needed improvements as they are identified.

12-11 Respectively, this conclusion doesn't pass the "giggle test". For example, adding up to 499 homes with 833 drivers (1.67 vehicles per unit) compared to 35 homes (current General Plan zoning) with 112 drivers (3.2 vehicles per unit), will increase the number of drivers on the Southeast corner of Waterman and Sheldon Roads by about 700. This increase, with the only road improvement identified to be the widening of the existing Waterman and Sheldon Road roundabout, seriously calls into question the Less Than Significant designation.

12-12 The report recognizes increased traffic as unavoidable but will be Less Than Significant because these drivers don't drive during peak hours and drive less than traditional residential unit drivers. This conclusion is not reasonable for an increase of 700 drivers added to one corner of an intersection.

12-13 The Travel Demand Forecast is understated. The draft EIR uses Vehicle Miles Traveled (VMT) to project the forecast and states it "accounts for full range of users and not just residents" and identifies "Substitution of internet shopping and home delivery for some shopping or meal-related travel", as potential limitations (i.e., did not account for service delivery vehicles) for the Travel Demand Forecast. These two statements are in conflict. By not considering the impact of internet shopping on VMT, the full range of users is not

2

Letter 12 Cont.

12-13 Cont.

accounted for. The Forecast used the trip rate for Senior Adult Housing, which is a lower rate than the rate for Traditional Single Unit housing, and accounted for only the household trips of residents and not their service requested and family trips or the project site staff trips. This has the effect of excluding a significant number of senior-related trips including but not limited to: package delivery trucks, home care service, emergency vehicles for in-house falls and transport to hospitals, elder transport vehicles for routine doctor and clinic appointments, health checks, housekeepers, and family visits; and project site trips including yard and facilities maintenance, security and sales staff. The exclusion of package delivery trucks is particularly significant: 1) as trucks are generally dispatched per online transaction as opposed to grouped together to make a list to limit the number of trips to the store, and 2) the growing trend of e-commerce and related technologies (e.g., Artificial Intelligence) providing more purchase opportunities and options. The Travel Demand Forecast should be recalculated, analyzed for impact and brought forward to the Executive Summary regardless of the degree of impact determined, as transportation impact is what the community expects to see and contemplate as a reasonable conclusion in any land development project and its related EIR.

12-14

Section 4.11-4 Impacts and Mitigation Measures identify the formation of a, or annexation into an existing, CFD as a way of funding transportation improvements needed to support the project. The discussion is limited to pedestrian, bicycle and transit needs. Does this mean road and infrastructure improvements needed to address vehicle transportation needs (e.g., widening of Sheldon Road, replacement of the bridge crossing Laguna Creek on Sheldon Road) would be excluded? Also, it is not clear which property owners would be subject to a special property tax to fund the CFD. Is the special tax specifically limited to the project developer and homeowners? I oppose taxing current property owners of the Sheldon Road corridor for the road improvements needed since we are not responsible for the need.

12-15

12-16

There is an error in the calculation of Daily Total Trips. Table 4.11-5 shows 1,944 trips and should be 2,151 (499 units x 4.31 rate).

12-17

Fire Safety

Although there is no formal fire safety evacuation plan for the Elk Grove Rural Area, the number of escape routes currently available for residents living on Sheldon Road between Waterman and Bradshaw is two, one east to Bradshaw and the other west to Waterman. Neither Summer Villas or Aquatic account for a reduction in the number of viable evacuation routes (from 2 to 1) for these homeowners. Adding 422 to 499 units to Sheldon Road west of Dasani Road will virtually eliminate evacuation to the west as a viable option

3

Letter 12 Cont.

12-17 Cont. for these homeowners, especially when you consider the special transport needs of the elderly and how long it would take to evacuate them in a mandatory evacuation situation.

Effects Found Not to Be Significant

12-18 Ag Resources – "Involve other changes in the existing environment which, due to location, could result in conversion of farmland to non-agricultural use". The report does not address the potential for increased pressure to rezone parcels adjacent to and surrounding the project site. The project site is surrounded by property zoned Ag Res 2 Acre. With the change in zoning to significantly higher density for Summer Villas and Aquatic, there will be more pressure to increase density in the adjoining parcels supported by complaints from project residents about agricultural activities (e.g., odor, dust, noise). This will have the effect of removing farmland to non-agricultural use.

12-19 Hazards and Hazardous Materials – "Does not expose people or structures, directly or indirectly to risk of loss, injury and death involving wildfires because not located in a high or very high fire hazard zone (nearest zone is 3.1 miles away) and the developed project area would serve as a fire break". This conclusion does not account for recent increases in wind speeds, temperatures, and wildfires that have completely devasted cities including the developed areas. See recent Paradise, Altadena, and Palisades wildfires. Conclusion needs to be reassessed.

Superior Alternative - Comparison of Environmental Impacts of Project Alternatives

12-20 4.1-1 In a non-urbanized area, substantially degrade visual character... Aquatic would be "Fewer". Disagree, the east side of the development (east of the creek) with its grasslands and cattle is "the visually appealing view" not the west side where the electrical power lines reside. The Aquatic alternative increases the number of units on the east side from 289 for Summer Villas to 422 and increases the number of grassland acres developed on the east side by 23 acres (from 40 to 63). This conclusion should be Greater.

12-21 4.1-3 Create a new source of substantial light or glare... Aquatic would be "Fewer". Disagree, this does not account for the increased glare due to increased density of units (289 to 422) on the east side of the creek. Should be Greater.

12-22 4.8-3 Induce Substantial Unplanned Population Growth... Aquatic would be "Fewer". Disagree, the Project site is surrounded by Ag Res 2 Acres zoned parcels, which would be pressured to rezone to higher density. See Ag Resources paragraph above. Should be Greater.

12-23 4.11-2 Conflict with a program, plan, ordinance, or policy addressing roadway... Aquatic would be "Fewer". The alternative pushes all project development traffic to Sheldon Road

Letter 12 Cont.

12-23 Cont.

with no traffic relief to Waterman Road. There are no entries/exists on Waterman Road for Aquatic. Should be Greater.

Carlos Zamarripa, Homeowner

9544 Sheldon Road

Elk Grove, CA 95624

(916) 990-7159

LETTER 12: CARLOS ZAMARRIPA (1 OF 2)

Response to Comment 12-1
The comment is an introduction statement.

Response to Comment 12-2
Pursuant to CEQA Guidelines Section 15126, in considering and discussing the environmental impacts of a project, an EIR shall include a discussion of the significant environmental effects of the project, significant irreversible environmental changes, growth-inducing impacts, mitigation measures, and alternatives to the project. The Draft EIR adequately evaluated all such topics in compliance with the requirements of CEQA. An analysis of which environmental topics may weigh more importantly is up for personal interpretation, and is not required pursuant to CEQA. The purpose of CEQA is not to identify what topics are more important than others, but rather to provide an unbiased analysis of all potential environmental impacts. Nonetheless, the environmental topics included in each technical chapter of the Draft EIR were selected by the City and determined to require an EIR-level of evaluation based on the potential environmental impacts. Lastly, a discussion of social and economic impacts, including costs associated with the Project, is not required pursuant to CEQA. The comment has been noted and forwarded to the decision-makers for their consideration of the Project. The City Council, as the final decision-making body, will ultimately determine the importance of the significant impacts and whether the benefits of the Project outweigh the environmental impacts of the Project through a statement of overriding considerations.

Response to Comment 12-3
The objectives of the Project were submitted by the Project applicant. Pursuant to CEQA Guidelines Section 15124, a clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project and may discuss the project benefits. The Project objectives included in Chapter 3, Project Description, of the Draft EIR, adequately convey the purpose of the Project, and the Project applicant is not required to include an objective related to preserving the rural nature of the Project area. Nonetheless, revisions to the list of objectives sought by the Project applicant would not affect the analysis or conclusions of the Draft EIR. The comment will be forwarded to the decision-makers for their consideration of the Project.

Response to Comment 12-4
Surrounding existing uses include rural residences and rural estate residences (zoned Agricultural Residential) to the north, across Sheldon Road; undeveloped land and rural residences (zoned Agricultural Residential) to the east; rural residences and a high school/middle school complex (zoned Agricultural Residential/Public Services) to the southeast; rural residences and open space (zoned Agricultural Residential/Special Planning Area), which includes the Elliot Springs SPA subdivision to the west, across Waterman Road; and mostly undeveloped land with a non-profit horse rescue operation and rural estate residences (zoned Agricultural Residential) to the south. Objective #8 summarizes the applicant's objective of the Project. Nonetheless, revisions to the list of objectives sought by the Project applicant would not affect the analysis or conclusions of the Draft EIR.

Response to Comment 12-5
Please see Response to Comment 12-3.

Response to Comment 12-6
The Aquatic Resource Avoidance Alternative would maintain the same overall residential density as the Project, and would therefore be consistent with the LDR land use designation.

Response to Comment 12-7
Please see Master Response 3. Chapter 7, Alternatives Analysis, of the Draft EIR includes an objective discussion of the alternatives' consistency with Project objectives, including the No Project (Buildout Pursuant to the General Plan) Alternative.

Response to Comment 12-8
The Draft EIR concluded that impacts related to conflicts with a program, plan, ordinance, or policy addressing the circulation system, including during construction activities, as well as pedestrian, bicycle, and transit facilities during operations, would be less than significant with implementation of Mitigation Measures 4.11-1, 4.11-2, 4.11-3(a), and 4.11-3(b). Impacts related to VMT were determined to remain significant and unavoidable even with implementation of Mitigation Measure 4.11-4. Chapter 2, Executive Summary, of the Draft EIR includes all such conclusions. In addition, as discussed in Chapter 7, Alternatives Analysis, of the Draft EIR, the Aquatic Resources Preservation Alternative was determined to result in similar impacts.

Response to Comment 12-9
The comment is unclear. The Draft EIR includes a detailed analysis of transportation impacts, pursuant to CEQA requirements, and includes mitigation measures as applicable related to construction traffic, bicycle, pedestrian, and transit facilities, and VMT.

Response to Comment 12-10
Impacts related to VMT were determined to remain significant and unavoidable even with implementation of Mitigation Measure 4.11-4. Impacts related to bicycle, pedestrian, and transit infrastructure were identified to be less than significant with implementation of Mitigation Measures 4.11-2, 4.11-3(a), and 4.11-3(b), which require the Project applicant to construct or fund necessary improvements.

Response to Comment 12-11
Please see Master Response 2. Furthermore, as discussed in Chapter 3, Project Description, of the Draft EIR, the Transportation Analysis Report prepared for the project by Fehr & Peers identifies the following roadway improvements that would be triggered by the Project under existing plus project and cumulative plus project conditions:

- **Sheldon Road/Waterman Road Roundabout –** Reconfigure the roundabout to a two-lane circulatory design and widen the approaches to accommodate an additional lane for all movements at the intersection. Widening will be limited to the intersection only, with the two lanes tapering off into one lane.
- **Sheldon Road/Bradshaw Road Roundabout –** Reconfigure the roundabout to include two travel lanes in the east-west direction. Widening will be limited to the intersection only, with the two east-west lanes tapering off into one lane.

The Project applicant would be required to contribute funding toward the development of such roadway improvements, and the potential physical environmental impacts associated with the roadway improvements were analyzed throughout the Draft EIR.

Response to Comment 12-12

Please see Master Response 2. The Draft EIR does not make an impact determination related to traffic congestion.

Response to Comment 12-13

Consistent with CEQA Guidelines Section 15064.4, a lead agency may use a model or methodology to estimate GHG emissions resulting from a project. The lead agency has 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. The lead agency must support its selection of a model or methodology with substantial evidence. The lead agency should explain the limitations of the particular model or methodology selected for use. Thus, Fehr & Peers extended the same guidance to the analysis of travel demand forecasts.

According to Fehr & Peers, the author of the Transportation Analysis Report prepared for the Project, potential limitations of the travel demand model used for the transportation analysis of the Project were identified. The limitations identified are not a statement on the adequacy of the analysis tool but an acknowledgment that how people travel and access goods and services is changing rapidly, especially after an event like the COVID-19 Pandemic. Typically a lag in the data used to calibrate and validate the transportation analysis tools occurs, which is partly why the City conducts periodic updates to the EGSIM model to capture changes in travel behavior. As a result of the calibration and validate conducted for the EGSIM20 model, which is documented in *EGSIM20 – Model Development Report and VMT Methodology* (October 5, 2022), EGSIM20 is the most appropriate tool for the VMT analysis. The resulting vehicle trip generation developed by household activities, which are modeled by EGSIM20, are based on travel survey data that captures all household activities and that would include work trips, school trips, trips made for shopping, deliveries, etc. that were occurring at the time the survey was conducted.

In December 2018, the Governor's Office and Land Use and Climate Innovation (LCI) (formerly known as the Office and Planning and Research [OPR]) published the *Technical Advisory on Evaluating Transportation Impacts in CEQA (Technical Advisory)*, which provided guidance for implementing Senate Bill (SB) 743. The analysis conducted for the Project followed the OPR guidance, including the application of the analysis tool (i.e., EGSIM20) that is used to set VMT performance thresholds to calculate the VMT performance of the Project. Using the same tool provides an apples-to-apples analysis that avoids introducing error associated with different tools and methodologies. Therefore, the effect of the limitations outlined are captured in both the VMT performance threshold and the VMT performance of the Project. Consequently, the analysis is capturing the effect of the Project and relative change in VMT performance. Changing model parameters to adjust for potential limitations would be captured in both models so the relative VMT performance would be similar.

Response to Comment 12-14

Please see Master Response 2 and Response to Comment 12-11.

Response to Comment 12-15

Mitigation Measure 4.11-4 requires that property owners associated with the site pay their fair share portion of the costs of providing pedestrian and bicycle facility improvements, transit services and infrastructure, and community based travel planning (CBTP) and assistance, prior to recordation of the first Final Map. As such, existing property owners of the Sheldon Road corridor would not be subject to payment of such fees.

Response to Comment 12-16

In response to the comment, pages 4.11-17 and 4.11-18 in Chapter 4.11, Transportation, of the Draft EIR are hereby revised as follows:

Project Trip Generation

The trip generation for the Project was calculated using trip generation rates published in the Institute of Transportation Engineers 11th Edition Trip Generation Manual. The applicable rate for the proposed land use is category 251 (Senior Adult Housing – Single-Family). Application of the foregoing trip generation rates to the 499 age-restricted single-unit residences yields a total of ~~1,944~~ 2,151 daily trips with ~~108~~ 120 trips generated in the AM peak hour and ~~135~~ 150 trips generated during the PM peak hour. Table 4.11-5 summarizes the trip generation associated with the Project.

Table 4.11-5
Project Trip Generation

Land Use	ITE Code	Time	Trip Rate	Percent In	Percent Out	Total Trips	Ins	Outs
Senior Adult Housing – Detached	251	Daily	4.31	50	50	~~1,944~~ 2,151	~~972~~ 1,075	~~972~~ 1,076
		AM Peak Hour	0.24	33	67	~~108~~ 120	~~36~~ 40	~~72~~ 80
		PM Peak Hour	0.3	61	39	~~135~~ 150	~~82~~ 91	~~53~~ 59

Source: Fehr & Peers, 2025.

The above revisions are for clarification purposes only and do not affect the analysis or conclusions of the Draft EIR. Furthermore, the above revisions are consistent with the analysis included in the Transportation Analysis Report prepared for the Project by Fehr & Peers (included as Appendix N of the Draft EIR).

Response to Comment 12-17

Please see Response to Comment 9-10. Furthermore, the commenter does not provide evidence that the Project would eliminate evacuation routes.

Response to Comment 12-18

As discussed in Chapter 6, Statutorily Required Sections, of the Draft EIR, it would be speculative to attempt to predict where and how much future development could occur as a direct result of the Project, and the Project would not encourage or facilitate other activities that could significantly affect the environment.

Response to Comment 12-19

With respect to the potential for the Project to expose people or structures off-site to the risk of wildfire, development of the Project would include site-clearing activities, which would remove on-

site vegetation. As such, development of the site with residential uses would reduce the risk of wildland fire to surrounding areas, because site improvements, such as the proposed structures, internal streets, and irrigated on-site landscaping, would reduce readily combustible vegetation and act as a fuel break. Additionally, wildfire risks would not be anticipated to be exacerbated during project operation, as residential uses typically do not involve operational components that would increase the risk of wildfire. In addition, as stated by the commenter and as discussed in Chapter 5, Effects Not Found to be Significant, of the Draft EIR, the site is not located within a High or Very High Fire Hazard Severity Zone (FHSZ), which would further reduce the potential for the Project to result in wildfire impacts. The nearest High or Very High FHSZ relative to the site is located approximately 3.31 miles northeast.

Response to Comment 12-20

The Aquatic Resources Avoidance Alternative would preserve 31.3 additional acres of natural habitat and aquatic resources than the Project and would develop 77 fewer units than the Project on a reduced footprint with the same density. Due to the decreased disturbance area, impacts related to Aesthetics under the Alternative would be fewer than the Project. Regardless of whether the eastern or western portion of the site is more visually appealing, the Alternative would result in less conversion of vacant land to residential uses and associated degradation of visual character of the site.

Response to Comment 12-21

Please see Response to Comment 12-20. Furthermore, as discussed on pages 7-15 and 7-16 in Chapter 7, Alternatives Analysis, of the Draft EIR, the Aquatic Resources Avoidance Alternative would preserve 31.3 additional acres of natural habitat and aquatic resources than the Project and would develop 77 fewer units than the Project on a reduced footprint with the same overall density. Therefore, the Alternative would produce less light and glare than the Project, and the Alternative would result in a lesser impact related to the creation of a new source of substantial light or glare which would adversely affect day or nighttime views in the area and associated with cumulative development of the City. However, Mitigation Measures 4.1-3 and 4.1-5, requiring a lighting plan and photometric plan on residential lighting, would still be required through entitlements.

Response to Comment 12-22

Please see Response to Comment 12-18.

Response to Comment 12-23

Please see Master Response 2. Impact 4.11-2 referenced by the commenter is related to conflicts with pedestrian and bicycle facilities. The Draft EIR concluded that impacts related to pedestrian and bicycle facilities would be similar under the Alternative as compared to the Project.

Letter 13

City of Elk Grove

Attn: Kyra Killingsworth, Senior Planner

8401 Laguna Palms Way

Elk Grove, CA 95758

November 14, 2025

RE: Summer Villas Special Planning Area Project, Draft Environmental Impact Report (EIR)

13-1

Dear Ms. Killingsworth,

This is an addendum to my comments dated November 13, 2025.

Superior Alternative - Comparison of Environmental Impacts of Project Alternatives

As you reconsider the assessment of alternatives, please add an alternative that limits Senior Adult Housing development to the west side of the creek. This alternative would score higher than the identified alternatives and the Summer Villas Project as it would:

13-2

- Reduce the number of LDR housing units to about 210 (the number proposed in the Summer Villas Project for the west side)
- Channel most of the increased traffic to Waterman Road where most of the road infrastructure required to support it already exists
- Delays the need for significant Sheldon Road improvements such as increasing the road to four lanes and widening of the bridge crossing the creek
- Provides the largest senior adult housing development in Rural Elk Grove (bigger than Elliott Springs)
- Preserves the rural nature of the east side of the creek to Ag Res 2 Acre zoning consistent with the current General Plan
- Increases the feasibility and value of the development project by about $100 million (200 units x $500,000 per unit)
- "Walls off" development, as the creek acts as a natural boundary between the development on the west side and the more aesthetic appealing east side
- Aligns with the missing Project Objective identified in my November 13, 2025, comments: *To preserve the rural nature of eastern Elk Grove (the triangle bordered*

1

Letter 13 Cont.

13-2 Cont.

by Elk Grove – Florin, Sheldon, and Grant Line Roads) and its proud heritage consistent with Elk Grove City policies intended to ensure it.

Thank you for your consideration.

Carlos Zamarripa, Homeowner

9544 Sheldon Road

Elk Grove, CA 95624

(916) 990-7159

LETTER 13: CARLOS ZAMARRIPA (2 OF 2)

Response to Comment 13-1
The comment is an introduction statement.

Response to Comment 13-2
Please see Master Response 3 and Response to Comment 12-3. Chapter 7, Alternatives Analysis, of the Draft EIR, included an evaluation of an Aquatic Resources Avoidance Alternative, which limits development to the east side of the creek in order to preserve aquatic resources in the western portion of the site. The comment has been noted and will be forwarded to the decision-makers for their consideration of the Project.

Letter 14

Christina Gentil
Debbie Colquitt
8674 Waterman Road
Elk Grove, CA 95624

November 16, 2025

Kyra Killingsworth, Senior Planner
City of Elk Grove Community Development Department
Planning Division
8401 Laguna Palms Way
Elk Grove, CA 95758

RE: Summer Villas Special Planning Area EIR

To Whom It May Concern:

14-1 As original homeowners on Waterman Road south of Sheldon, we are writing to express our deep concerns about the proposed development in our area. Our primary issues involve transportation and safety, water quality, and the lasting impact on the rural character of our community.

Transportation & Safety

14-2 The safety of our family and neighbors is our greatest concern. For decades, we have experienced ongoing hazards associated with entering and exiting our own driveways. We have witnessed several fatalities on this stretch of road, including our father, **Edward Villasenor**. Even today—without the added traffic from the proposed Villas project—it can take up to seven minutes just to safely exit our property when the roundabout backs up on the two-lane road.

14-3 Adding nearly 500 residential units will significantly worsen these conditions. Increased congestion will make it even more difficult and dangerous for residents to access their homes and will severely impede emergency vehicles, placing lives at risk. This becomes even more critical considering the proposed senior housing, where rapid emergency response can be a matter of life or death.

14-4 Furthermore, the roundabouts at Waterman, Bradshaw, and Sheldon already see frequent accidents. In the event of a major emergency such as a fire or flood, the two-lane evacuation routes could become completely blocked, trapping residents and livestock. Without clear evacuation planning and traffic control improvements, the consequences could be life-threatening.

Letter 14 Cont.

14-5 Construction activity will also affect daily living. Increased truck traffic on Waterman and Sheldon will worsen noise levels, dust, road wear, and air quality. These impacts are especially concerning for residents with asthma and other underlying health conditions—and for the livestock that also must endure the deteriorating air quality.

14-6 We are requesting detailed plans for evacuation routes, traffic management, roadway safety improvements, and mitigation of construction impacts before any development proceeds.

Water Quality & Well Impacts

14-7 Many families in this area rely entirely on well water. A development of this size will significantly reduce groundwater availability. We are concerned about whether the City or developers are prepared to assist existing homeowners if wells need to be upgraded, deepened, or redrilled due to lowered water tables.

14-8 For many of us, irrigation is essential—not only for household needs but also for livestock. Many residents are retired and do not have the financial means to re-dig wells or undertake major modifications to maintain adequate water supply.

14-9 We ask the City to clearly address:

14-10
- How groundwater impacts will be evaluated,
- What protections will be put in place for current well users,
- What assistance existing homeowners will receive if wells fail or require major upgrades, and
- How water quality and quantity will be maintained for long-term residents.

Preserving Rural Character & Community Heritage

14-11 Lastly, it is important to recognize that this part of Elk Grove is a uniquely beautiful rural area—one of the very reasons many of us chose to make it our generational home. Elk Grove has long been known for its rural charm, which continues to draw residents seeking open space and agricultural lifestyle.

The EIR states the development is intended to support "downsizing," yet many of us have no desire to leave our homes. These properties were built and cared for by our parents and grandparents; they are part of our history, and we hope to pass them on to our children and grandchildren.

Unfortunately, Elk Grove has been changing rapidly. Many of us remember when Elk Grove Boulevard and Elk Grove-Florin were two-lane roads and before Laguna even existed. If development continues at this pace, the rural character of our city will disappear entirely. It is

Letter 14 Cont.

14-11 Cont.

difficult to accept decisions being made by individuals who do not live in this immediate area—many of us have been here for 50 years or more and will be directly affected for the rest of our lives.

14-12

We appreciate your time, consideration, and explanation regarding these significant inadequacies and the lifestyle changes that will deeply affect the years we have left in our homes. We respectfully ask that you prioritize the safety, wellbeing, and heritage of the longstanding residents of this community.

Sincerely,
Christina Gentil
christinagentil@comcast.net

Debbie Gentil
debbiecolquitt@comcast.net

LETTER 14: CHRISTINA AND DEBBIE GENTIL

Response to Comment 14-1
The comment is introductory to the remainder of the comment letter. Please see the following responses to specific comments.

Response to Comment 14-2
Please see Master Responses 1 and 2.

Response to Comment 14-3
Please see Master Response 2.

Response to Comment 14-4
The roundabout at the intersection of Sheldon Road and Waterman Road at the northwest corner of the site would be modified as part of the Project. The Project would reconfigure the roundabout into a two-lane circulatory design and widen the approaches to accommodate an additional lane. Widening would be limited to the intersection only, with the two lanes tapering off into one lane. In addition, as discussed under Impact 4.6-3 of the Draft EIR, evacuation planning is managed by the City's participation in the County's LHMP, as well as the City-specific EOP. The Project, as designed, would not interfere with or impair implementation of an adopted emergency response or emergency evacuation plan.

Response to Comment 14-5
The potential impacts of Project construction on noise levels and air quality, including dust and potential health impacts, are discussed within Chapters 4.9, Noise, and 4.2, Air Quality, Greenhouse Gas Emissions, and Energy, respectively.

Response to Comment 14-6
Please see Master Response 1.

Response to Comment 14-7
Please see Response to Comment 9-5.

Response to Comment 14-8
Please see Master Response 1.

Response to Comment 14-9
The groundwater discussion within Chapter 4.10, Public Services and Utilities, of the Draft EIR was based on the following: the City of Elk Grove General Plan and General Plan EIR; the EGWD 2020 Urban Water Management Plan (UWMP), and direct communication with service providers. In addition, a Domestic Water Demand Analysis was prepared to assess project-specific impacts related to the proposed water supply (see Appendix L to the Draft EIR). As part of the Domestic Water Demand Analysis, water demands for the proposed system were based on the acreage of each land use multiplied by the appropriate water demand factor. The applied water demand factors were based on the same factors from the 2016 SCWA Plan. With respect to water supply, please see Response to Comment 8-4.

Response to Comment 14-10

Please see Response to Comment 8-4.

As noted on page 4.7-28 of the Draft EIR, compliance with the applicable regulations would ensure that cumulative impacts related to the discharge of pollutants are minimized to the extent feasible.

Response to Comment 14-11

Please see Master Response 1.

Response to Comment 14-12

The comment is a conclusion statement. The comment will be forwarded to the decision-makers as part of consideration of the Project.

Letter 15

[EXTERNAL EMAIL]

Submitted on Fri, 10/31/2025 - 16:16

Submitted by: Anonymous

Submitted values are:

Name
Dalenah Rowe

Email
dalenahrowe@hotmail.com

Phone
9165591955

Comments/Questions
15-1 Traffic in this area of Sheldon Rd. is already horrible. Please keep this area rural. Do not go forward with this development project. Find another area with the infrastructure already built for this kind of project.

LETTER 15: DALENAH ROWE

Response to Comment 15-1

Please see Master Responses 1 and 2.

Letter 16

You don't often get email from danielkristic@comcast.net. Learn why this is important
[EXTERNAL EMAIL]

October 27, 2025

Public Comment on the Draft EIR for Summer Villas SPA (APN 127-0010-077)
To: Councilmember Rod Brewer District 2, City of Elk Grove, CA,
Kyra Killingsworth, Senior Planner, City of Elk Grove
Subject: Opposition to Summer Villas SPA – Significant Unavoidable Impacts and Community Incompatibility

We are residents of Saint Anthony Court, Elk Grove, having lived here on AR2 zoned property for 43 years.

The Summer Villas SPA project is absolutely inappropriate use of this historical, treasured area of Elk Grove as anyone, resident or visitor, would easily conclude.

16-1 Having read the environmental impact report, we believe it addresses a myriad of reasons the project should not be approved.

We concur wholeheartedly with the letter sent to you today by our neighbors, August and Ann Saibeni. They made specific references to the EIR that identify significant unavoidable impacts and community incompatibility.

We urge you to reject this project, the rezoning, and all of the alternatives discussed that would allow even a pared down version that would lead to future incursions of inappropriate projects.
Keep rural Elk Grove rural and listen to your constituency!

Daniel and Lucinda Kristic
8843 Saint Anthony Court
Elk Grove CA 95624

LETTER 16: DANIEL AND LUCINDA KRISTIC

Response to Comment 16-1

Please see Master Response 1.

Letter 17

RECEIVED
NOV 24 2025
CITY OF ELK GROVE
PLANNING

SUMMER VILLAS SPECIAL PLANNING AREA
DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)
COMMENT MEETING

COMMENT FORM

To document the author of comments received, please provide the following information. Thank you.

Name: Delany Kennedy

Address: 8664 Rubia Dr.

Organization (if applicable): granddaughter 9yrs old

Please provide us with your written comments on the Draft EIR by **5:00 PM, November 24, 2025.**

17-1 Delany is 9yrs old and felt the need to speak at the meeting. Her consern is that if theres a fire how can you evacuate all those people and her grandma would like to put a footnote in here as if there was to be a major evacuation and the train crossing is blocked by a train it would slow the prosses of a quick response.

17-2 Another consern Delany has is riding horses safely in the area and our neighborhoods being over populated with unsafe drivers who honk at horses and hit and kill our wildlife to extintion. She says she wants it to stay country.

Send comments to:

Kyra Killingsworth, Senior Planner
City of Elk Grove Community Development Department
Planning Division
8401 Laguna Palms Way
Elk Grove, CA 95758
kkillingsworth@elkgrove.gov

*Figure not OCR Compatible.

LETTER 17: DELANY KENNEDY

Response to Comment 17-1

The potential for the Project to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan is discussed under Impact 4.6-3 of the Draft EIR. As discussed therein, evacuation planning is managed by the City's participation in the County's LHMP, as well as the City-specific EOP. The Project, as designed, would not interfere with or impair implementation of an adopted emergency response or emergency evacuation plan.

Response to Comment 17-2

Please see Master Response 1.

Letter 18

From: diane owen <dianeooowen@yahoo.com>
Sent: Sunday, November 16, 2025 4:42 PM
To: Kyra Killingsworth <kkillingsworth@elkgrove.gov>
Subject: Summer Villas SPA Draft DEIR comments

You don't often get email from dianeooowen@yahoo.com. Learn why this is important
[EXTERNAL EMAIL]

November 16, 2015

Attn: Kyra Killingsworth, Senior Planner

Please accept these comments regarding the proposed Summer Villas SPA.

18-1

The idea of establishing an area that would remain rural goes back to when Elk Grove first became a city. To accomplish this, restrictions of land size and infrastructure were established. Today the Rural Elk Grove SPA lot size is restricted to a 2 acre minimum, designated Agriculture-Residential, with no access to urban services. Services are instead self provided and contained using individual wells and septic systems. Roadways are narrow and bordered with ditches that without a structured storm drain system provide for drainage of agricultural runoff and rain water. Without access to natural gas, there is the alternate use of individual propane tanks. All of these accommodations are willing taken on in order to enjoy the life that comes with living in a rural community.

All of these conditions exist currently at the location of the proposed Summer Villas SPA. If this project is approved, approximately 116 acres will be removed from Agriculture-Residential and rezoned to Low Density Residential, allowing 499 homes to be built on a portion, 71.3 acres, up from the approximately 35 homes that would be allowed in its current designation, which would increase projected home density by 1,325%.

It is more than mass and density that is problematic with this application. This project would inevitably alter the entire area of Rural Elk Grove. The proposed Summer Villas project is bordered on Waterman on the west and Sheldon Road on the north. At this juncture Sheldon Road is still a two land road with no improvements. This is a proposed 55+ community. An ACTIVE adult community that would generate traffic. The amount of car traffic introduced onto Sheldon generated by this project would result in a road widening, especially if there is ingress or egress. Even if access is only gained from Waterman there would be a huge increase of traffic down Sheldon and other rural feeder roads to gain access. This would result in the entirety of Sheldon Road east being widened and the removal of all the heritage oaks that line that roadway. The impact of this project goes far beyond its boundaries. It should be pointed out that property immediately across Sheldon Road from this project is currently in the process of being developed and being developed within The AgRes parameters, as did another

Letter 18 Cont.

18-1 Cont.

recent development on a piece of property directly adjacent to that one on Sheldon Road.

It is not just roadway infrastructure that would be affected but approving Summer Villas SPA would bring in urban services like water, sewer and natural gas where none now exist. The absence of this type of improvement is what establishes the area as rural, guaranteeing growth will not exceed the parameters established to maintain the rural character.

Approving the Summer Villas development and changing the current zoning from AgRes to LDR would place urban infrastructure within an agricultural community. It is important that consideration be given to the possible ramifications of introducing these improvements into a community that has intentionally disallowed them.

Thank you for your consideration.

Diane Owen
8690 Mecca Road
Elk Grove, CA 95624

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LETTER 18: DIANE OWEN

Response to Comment 18-1

Please see Master Response 1.

The roadway improvements that would be triggered by the Project would be the reconfiguration of the Sheldon Road/Waterman Road and the Sheldon Road/Bradshaw Road Roundabouts. As discussed on page 3-19 in Chapter 3, Project Description, of the Draft EIR, the Sheldon Road/Waterman Road Roundabout would be reconfigured to include a two-lane circulatory design and to widen the approaches to accommodate an additional lane for all movements within the intersection. Widening would be limited to the intersection only, with the two lanes tapering off into one lane. The Sheldon Road/Bradshaw Road Roundabout would be reconfigured to include two travel lanes in the east-west direction. Widening would be limited to the intersection only, with the two east-west lanes tapering off into one lane. Therefore, the roadway improvements triggered by the Project would be limited to the intersections mentioned above only, and the widening of the entirety of Sheldon Road would not occur.

Letter 19

[EXTERNAL EMAIL]

Kyra Killingsworth
Re: DEIR Summer Villas
Nov. 21, 2025 6:52PM

Kyra,

19-1 The following comments are being submitted in response to the DEIR and the stated Project Objectives and conclusions shown in Chapter 7, Table 7-2 , Alternatives Analysis of the DEIR for the Summer Villas project (PLNG-23-007). My comments are based on the comparisons of the No Project (Buildout Pursuant to General Plan Alternative (#1) and Aquatic Resource Avoidance Alternative (#2) as shown in Table 7-2.
(Note: The use of the Aquatic Resource Avoidance Alternative title is misleading as there is no such proposed project. It is a **No Project** alternative).

Chapter 3 Project Objectives

19-2 I disagree the following Project Objectives should be given any weight in determining the Environmentally Superior Alternative:

1. Objectives #1, 4, 5, 6 & 8 Preserving Open Space. Any project would have to provide the stated open space due to creek setbacks, ROW and flood plain requirements. If weight is given for "providing open space" weight should be given equally and only once across the two Alternatives,

19-3 2. Objective #4. "Clustering". As originally submitted, the project is not making use of "clustering". The Project is designed to be built to the upper limit of LDR zoning of 7 units per acre. This is not clustering. Clustering only pertains to Alternative #2, which was produced by the consultant as an Alternative to the Project for comparison purposes,

19-4 3. Objective #8. Compatibility. As stated "to be compatible with surrounding land uses". This project is entirely surrounded by rural residential land uses of 1 acre or greater and, therefore, is not compatible.

19-5 On balance, it seems the Project Objectives are equally met by Alternatives #1&2. Therefore, the Alternatives Analysis (below) should be only considered in determining the Environmentally Superior Alternative.

Chapter 7 Alternatives Analysis

19-6 Alternative #1 would allow a build out of 35 units on 2 acre lots versus Alternative #2 allowing a build out of 422 units, clustered on 40+/- acres. Alternative #2 would be an increase of 1100% in unit count over the adopted and anticipated General Plan build out. Additionally, Alternative #1 would create less onsite/offsite disturbance, allow for the same amount of open space, be compatible with the surrounding area, produce less GHGs and require less roadway modification.

Letter 19 Cont.

Table 7-2, should be reassessed and amended to reflect the lesser impacts of Alternative #1 as indicated in strike out and red below:

No Project
Aquatic Resource
(Buildout Pursuant to General Plan)
Avoidance Alternative
Alternative

Alternative #1
Alternative #2
Impact 4.1-1
Fewer ~~Fewer~~ Similar

Impact 4.1-3
Fewer
~~Fewer~~ Similar

Impact 4.1-4 Fewer
~~Fewer~~ Similar

Impact 4.1-5
Fewer
~~Fewer~~ Similar

19-7

Impact 4.2-7 ~~Similar~~ Fewer
~~Fewer~~ Similar

Impacts 4.3-1 - ~~Similar~~ Fewer
Fewer
4.3-12

Impact 4.4-2 ~~Similar~~ Fewer
Fewer

Impact 4.4-3
Fewer
Fewer

Impact 4.4-4. ~~Similar~~ Fewer
Fewer

Impact 4.5-4. ~~Similar~~ Fewer
Fewer

Respectively,
George Murphey

LETTER 19: GEORGE MURPHEY (1 OF 2)

Response to Comment 19-1
The comment is introductory. A description of the Aquatic Resource Avoidance Alternative can be found on pages 7-14 through 7-19 in Chapter 7, Alternatives Analysis, of the Draft EIR. As described therein, the Aquatic Resource Avoidance Alternative would maintain the same overall residential density as the Project of 7.0 dwelling units per acre (du/ac) within a 60.3-acre footprint, resulting in the development of a total of 422 units. Therefore, the Aquatic Resource Avoidance Alternative would not be the equivalent of a No Project Alternative.

Response to Comment 19-2
Please see Response to Comment 12-3.

Response to Comment 19-3
Please see Response to Comment 7-15. Furthermore, as described in Project Objective 4 on page 3-3 in Chapter 3, Project Description, of the Draft EIR, the Project would cluster residential units on approximately 55 percent of the site while preserving the remainder of the site for open space and recreation.

Response to Comment 19-4
Please see Response to Comment 7-19.

Response to Comment 19-5
Please see Master Response 3.

Response to Comment 19-6
Please see Master Response 3. In addition, please see Response to Comment 7-5.

Response to Comment 19-7
Please see Response to Comment 7-41.

Letter 20

[EXTERNAL EMAIL]

Summer Villas Project
PLNG-23-007
Draft EIR Comments

Raney Consultants,

The following comments are based on the originally approved Tentative Subdivision Map and Design Review (EG-06-1146) for a 35 unit, 2 acre subdivision on this parcel. The original project was approved on 1-13- 2010 with a certified Mitigated Negative Declaration (MND). The Final Environmental Impact Report is registered with the State Clearing House, SCH 2009102073.

Comments on the current Summer Villas Draft EIR are based on the above MND:

20-1 The surrounding land uses haven't changed since the original approval, remaining RR. Changes to the surrounding area since the original approval include the Sheldon/Waterman roundabout and a new subdivision to the north, across Sheldon Rd. That subdivision (Sheldon Park Estates) is being built out as a 2 acre development.

Why wasn't the original MND used to inform the Summer Villas DEIR?

20-2 Why are the current No Project (Buildout Pursuant General Plan) Alternative impacts so drastically different as compared to the MND for the original project given the same number of units (35) are assumed to be built?

20-3 The No Project (No Build) Alternative is considered an alternative to the Project. Why is it not considered as the Environmentally Superior Alternative when compared to the two other alternatives? This alternative has no identified Environmental Impacts (Table 7-2), regardless of Project Objectives.

George Murphey

LETTER 20: GEORGE MURPHEY (2 OF 2)

Response to Comment 20-1

The previously approved Tentative Subdivision Map (State Clearing House No. 2009102073) was approved by City Council in 2010 and that map has since expired. All technical reports referenced throughout the Draft EIR were written for the proposed Project and do not address the expired map, as most of the information can be outdated.

Response to Comment 20-2

The previously approved Tentative Subdivision (State Clearing House No. 2009102073) was approved with 26 residential lots with a remainder lot. The since expired map showed three access points from Sheldon Road and no pedestrian bridge over Laguna Creek. The previously approved map is referenced in the No Project (Buildout Pursuant to General Plan) Alternative described in Chapter 7, Alternatives Analysis, of the Draft EIR.

Response to Comment 20-3

Please see Master Response 3. The environmentally superior alternative among the range of reasonable alternatives evaluated can be found on page 7-19 in Chapter 7, Alternatives Analysis, of the Draft EIR. Section 15126(e)(2) of the CEQA Guidelines requires that an environmentally superior alternative be designated and states, “If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” In this case, the No Project (No Build) Alternative would be considered the environmentally superior alternative, because the site is assumed to remain in its current condition under the alternative.

Although the No Project (No Build) Alternative would result in fewer impacts related to six of the 10 issue areas and would reduce significant and unavoidable impacts related to Noise and Land Use and Planning/Population and Housing, because the Alternative is a “no project” alternative, the Alternative would not be considered the environmentally superior alternative pursuant to Section 15126(e)(2) of the CEQA Guidelines.

Letter 21

[EXTERNAL EMAIL]

21-1

I am submitting this comment as an impacted homeowner in the Sheldon Estates. My family has lived in this rural property for more than 30 years. This proposed development would drastically change the rural Sheldon area.

The city has long maintained that Elk Grove would keep this area rural and any housing would be on larger lots to maintain the rural character. This proposal would change this area drastically, changing its rural character. This is not to mention the impact of additional traffic congestion which is already an issue on Waterman and Sheldon Road. It is incompatible with the area.

As a City of Elk Grove resident for over 30 years, I object this proposed development. The city council must do the right thing and deny this project and keep the eastern part of the city rural.

Thank you for your consideration on the impact this development proposal will have on the City of Elk Grove and all the rural homeowners in this area.

Regards,

GM Mendoza
9044 Deleon Court
Elk Grove, CA 95624

LETTER 21: GM MENDOZA

Response to Comment 21-1

Please see Master Response 1.

Letter 22

From: Jackie Onyon <jackieonyon@gmail.com>
Sent: Friday, November 7, 2025 9:01 AM
To: Kyra Killingsworth <kkillingsworth@elkgrove.gov>
Subject: Public Comment - Summer Villas at Sheldon

You don't often get email from jackieonyon@gmail.com. Learn why this is important
[EXTERNAL EMAIL]

To Whom It May Concern,

22-1

I am writing to oppose the proposed Summer Villas at Sheldon development in its entirety.

I am a long time resident of Elk grove with a child that goes to school in that area. It is already extremely congested and would not be able to sustain the influx of people. I support keeping that area as it is, more rural, less densely populated, with less light and air pollution from traffic and homes. I would like to keep it a safe area for my child to attend school without more cars on the street.

I urge the city to deny this project and keep the eastern part of the city rural.

Thank you for your consideration,

Jacqueline Onyon
8952 Portofino Dr.
Elk Grove, Ca 95758

By sending us an email (electronic mail message) or filling out a web form, you are sending us personal information (i.e. your name, address, email address or other information). We store this information in order to respond to or process your request or otherwise resolve the subject matter of your submission.

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LETTER 22: JACQUELINE ONYON

Response to Comment 22-1

Please see Master Response 1.

Letter 23

[EXTERNAL EMAIL]

Submitted on Tue, 11/04/2025 - 13:28

Submitted by: Anonymous

Submitted values are:

Name
James Fox

Email
foxdenof4@frontiernet.net

Phone
9168042087

Comments/Questions

23-1 I am totally against this project as described. The rural area boundaries were established quite a few years ago and are being ignored with this development. Elk Grove already has a traffic problem and I watch traffic back up every morning on Sheldon Road at the traffic circles and Bader Road. Also the availability of services available out in this planned development don't exist. If this development is passed, it will show the city is more interested in revenue than people it confesses to serve and will ruin and eventually destroy the rural area that's been established. Very poor decision.

LETTER 23: JAMES FOX

Response to Comment 23-1

Please see Master Responses 1 and 2.

Letter 24

November 21, 2025

City of Elk Grove Development Services Department
Planning Division
% Kyra Killingsworth
8401 Laguna Palms Way
Elk Grove, CA 95758

RE: Environmental Impact Report (EIR) - Summer Villas SPA Proposal

To The City of Elk Grove Planning Division:

As vested homeowners and residents of Rural Residential Elk Grove for over 12 years, we sincerely hope the Planning Commission and City Council members will honor and protect the General Plan / Rural Area Community Plan and AR-2 Zoning and deny the proposal to Amend and Rezone for the financial interests of a property owner / applicant / developer to drastically alter Rural Residential Elk Grove. This financial motive should not destroy or take precedence over what new, future and long time rural residents of Elk Grove have known, bought into, built their lives around, and understood to be protected by the General Plan / Rural Community Plan and AR-2 Zoning.

24-1

This development would be detrimental to our beloved Rural Elk Grove, which is recognized and cited on the City of Elk Grove website as *"the place that represents Elk Grove's 'Proud Heritage' and agricultural roots. The rural Elk Grove community is a valuable asset to be preserved and appreciated (and City policies ensure this)"* – elkgrovecity.org. People are drawn to live in this area because it embraces open space, agriculture and the opportunity to raise animals and support families and children in their 4-H and FFA endeavors.

24-2

Both the Project and the Aquatic Resource Avoidance Alternative developments would ***physically divide an established community AND substantially degrade the existing visual character or quality of views of the site and its surroundings*** and, ultimately, do not belong in the center of Rural Elk Grove.

24-3

The impact of what develops ON this land extends *well* beyond the land's property lines i.e. wildlife displacement, increased traffic and noise, division and fragmentation of the rural community, increased need for fire and medical services and demand for larger roads, which does not align with the General Plan / Rural Community Plan.

24-4

Because this land has no accessible city water, sewage or storm drainage, as residents maintain their own wells and septic systems with easements to manage storm drainage, extensive construction *through* the rural area along Sheldon and/or Waterman Road is required.

24-5

Please find our comments below in response to the draft EIR and carefully consider the long-term consequences that approving this development would have in shaping the future and character of Elk

Letter 24 Cont.

Grove and quality of life for new, long-time and further rural residents. Furthermore, please do not lose sight of what makes Elk Grove unique and the importance of maintaining and appreciating open space and the agricultural roots the City of Elk Grove was built on.

24-5 Cont.

- Please explain further why this impact was found to be *less than significant:*

4.8-1: Physically divide an established community… A project risks dividing an established community if *the project would introduce infrastructure or alter land use in a way which would change the land use conditions in the surrounding community, impact the community's functionality (e.g., access, transportation, infrastructure) or isolate an existing land use through a physical barrier. The Project would increase the intensity of development as compared to what was originally zoned for the site; however, the City's planned development of the site is indicative that the site has been envisioned as an extension of the existing surrounding residential uses.*

24-6

The Project would divide the well-established Rural Residential community of Elk Grove by introducing a gated community, requiring obstructive fencing and or walls, an "8 foot sound barrier wall" and replacing an already deemed rural residential area with low-density residential housing. The No Project / No Build and the No Project / Build Pursuant to General Plan are the only feasible and/or imaginable alternatives presented in the draft EIR that would serve as an *extension of the existing surrounding residential uses.*

24-7

Inserting a low-density residential development of 499 houses 7 du/ac, in the middle of a rural, non-urbanized setting will *further* divide and fragment the rural community by forcing *intended* small rural roadways to grow larger. We have yet to *fully* feel the increased traffic congestion, noise and impact from the nearby urbanization of the Elliott Springs 670 home build-out that is located on and accesses Waterman Road, not even one major roadway away from the Project site.

24-8

We adamantly disagree with the EIR statement that *The Project would not obstruct any existing or proposed transportation route that provides connectivity in the Rural Area Community Plan area.* Instead, the Project would *demand* larger roads, traffic signals, etc which would not only destroy aesthetics of this area, but also increase temporary AND permanent noise, pollution and degrade the rural community.

24-9

- **Traffic changes and the resulting permanent noise from the Project are VERY understated in the EIR.** Not only does traffic from the Project negatively impact aesthetics of the surrounding area, but it also poses safety threats of increased traffic collisions and decreased response time by fire and medical personnel.

24-10

24-11

The screenshot below from page 138 of the draft EIR is very concerning and suggests whoever believes widening the roundabouts is a safe and efficient solution, needs to spend more time driving through the

24-12

Letter 24 Cont.

area, especially during peak times. We have also experienced a huge impact with traffic diverting through the rural area when the Bond railroad tracks have been shut down for extended periods of time.

> The TIA identifies the following roadway improvements that would be triggered by the Project under existing plus project and cumulative plus project conditions:
>
> - **Sheldon Road/Waterman Road Roundabout –** Reconfigure the roundabout to a two-lane circulatory design and widen the approaches to accommodate an additional lane for all movements at the intersection. Widening will be limited to the intersection only, with the two lanes tapering off into one lane.
> - **Sheldon Road/Bradshaw Road Roundabout –** Reconfigure the roundabout to include two travel lanes in the east-west direction. Widening will be limited to the intersection only, with the two east-west lanes tapering off into one lane.

24-12 Cont.

Unfortunately, most drivers do not understand how to safely *merge* into a roundabout and *yield* to the vehicle already in the roundabout. Instead, they interpret "not stopping in the roundabout" to mean "make little or no attempt to slow down no matter what" when approaching and merging *into* the roundabout. We cannot express how many times we have experienced other drivers making NO attempt to slow or adjust their speed in order to safely yield and merge with traffic already in the roundabouts. As we regularly frequent both Sheldon roundabouts and have taught three of our five children to drive since the roundabouts came into existence, we consider ourselves experts on this topic.

One of our most horrifying roundabout memories took place at the Sheldon/Bradshaw Roundabout where there are two lanes traveling north-south and one lane traveling east-west. As we were in the one lane section of the roundabout headed West on Sheldon, a semi-truck sped into the roundabout traveling North on Bradshaw in the right-most lane without confirming which direction we were headed– North or West. Had we not been paying attention to the high speed in which the semi-truck was approaching the roundabout and we hadn't slowed our speed, or had we *expected* him to yield according to the law, there would've been a collision. Instead, the semi-truck fishtailed in and out of our center roundabout lane as we came around the roundabout and almost forced us to collide with the center median. Imagine how differently this scenario could have gone with an inexperienced driver.

- **4.11.2 Existing Environmental Setting**

24-13

Again, the traffic impacts and cumulative unfinished development of housing in the close vicinity of the project is understated. Additionally, *existing* development nearby is also glazed over and not adequately portrayed in how it impacts the rural roadways closest to the Project. For example, there are several existing non-rural residential communities on both major corners of Waterman at Bond and Calvine with access onto Waterman. There is an apartment complex, storage facility, gas station and Elliott Springs access point on the West side of Waterman approaching Bond from the North. Likewise, there is a residential development with access onto Waterman approaching Calvine from the South. While many

3

Letter 24 Cont.

24-13 Cont.

rural residents rely on at least one rural road to gain access to non-rural roadways, many drivers living outside the rural area use these roads to commute, take children to school, and some just to bypass railroad tracks on Bond and Elk-Grove Florin Roads. Adding more non-rural housing in this rural area will further impede traffic and exacerbate bottle-necking of traffic. Also of note, there are three high schools that are on the perimeter of the rural section of Elk Grove and largely impact traffic- Sheldon High, Pleasant Grove High and Bradshaw Christian High School.

24-14

The Average Daily Traffic (ADT) volume is helpful in gaging the numbers of vehicles in any given section near the Project Vicinity, but how does the draft EIR address the *projected* ADT and correct for full build out of Elliott Springs and the Project? Because there will inevitably be a substantial increase with the completion of either one.

Below is a summary from the draft EIR of ADT between the three closest sections of rural roadways and the next closest non-rural sections of roadways. While there is an overall higher traffic volume on non-rural roadways, the summary shows that there is still significant traffic on all roadways, which in turn leads to greater potential for more traffic travelling on smaller roads as larger roads become increasingly impacted.

RURAL ROADWAYS Primarily 2 lane ADT

Sheldon Road (east-west):
Bradshaw → 10,600 → Waterman → 13,800 → Elk-Grove Florin

Waterman Road (north-south):
Calvine → 11,100 → Sheldon → 12,470 → Bond

24-15

Bradshaw Road (north-south):
Calvine → 19,500 → Sheldon → 16,100 → Bond

NON-RURAL ROADWAYS Primarily > 2 lane ADT

Bond Road (east-west):
Bradshaw → 17,300 → Waterman → 20,800 → Elk-Grove Florin

Elk Grove-Florin Road (north-south):
Calvine → 26,700 → Sheldon → 22,800 → Bond

Calvine Road (east/west):
Bradshaw → 19,000 → Waterman → 29,520 → Elk-Grove Florin

24-16

- Please clarify: is there a VMT limit or standard for rural areas?

4

Letter 24 Cont.

24-16 Cont. It appears from the table below that the measure is based on LDR, which may be appropriate in an urbanized setting; however, VMT should be based on rural roadway standards (if there are any), since this Project is to be inserted into a rural area. Or does an amendment to the General Plan / Rural Community Plan for the Project extend and apply to the closest roadways regardless of rural area and mean LDR VMT is appropriate in this case?

24-17 Also, did the draft EIR state somewhere that commercial trucks and uses are not included in VMT? If so, that would definitely paint an inaccurate picture of how much traffic already utilizes rural roadways. We regularly see large commercial trucks travelling behind our house on Waterman Road.

24-18

Table 4.11-7
VMT Performance by Land Use

Land Use Designation	VMT Per Service Population for Low Density Residential
VMT Limit	19.3
VMT with Project	20.7
Difference	+7.3 Percent

Notes:
Calculated using EGSIM20.
VMT Limit is 85 percent of average base year VMT per service population by land use.

Source: Fehr & Peers, 2025.

- Please explain why the Aquatic Resource Avoidance Alternative was found to be ***the only alternative in which the majority of Project impacts would be reduced.***

would include the development of fewer residential units than the Project, the Alternative would not satisfy Objective #2. Overall, the Aquatic Resource Avoidance Alternative is the only alternative in which the majority of Project impacts would be reduced. Thus, the Aquatic Resource Avoidance Alternative is considered the environmentally superior alternative.

24-19 There would be NO impacts with the No Project / No Build and it was found that there were similar or fewer impacts with the No Project / Build Pursuant to General Plan Alternative. The Build Pursuant to General Plan would not require extensive off-site construction to bring in water, utilities, sewage and build a sewage lift system…. Furthermore, the EIR confirms that current roadways are capable of supporting the 35 or so residences that are consistent with General Plan / Rural Community Plan and AR-2 Zoning. In addition, according to Table 7-1 below, the No Project / Build Pursuant to General Plan Alternative uses 20.3 acres less for housing, which in turn results in 20.3 acres more of open space.

Letter 24 Cont.

Table 7-1 Development Area Comparison – No Project (Buildout Pursuant to General Plan) Alternative		
Land Use	**Project (Acres)**	**Alternative (Acres)**
RR	--	71.3
LDR	91.6	--
Parks and Open Space (P/OS)	19.4	39.7
Waterman Road and Sheldon Road	4.9	4.9
Total Acreage	**115.9**	**115.9**

24-19 Cont.

Both the Project and the Aquatic Resource Avoidance Alternatives would have detrimental and result in permanent negative impacts that would extend well beyond the Project site. The current General Plan / Rural Community Plan and AR-2 Zoning allow for approximately 35 houses on 2 acre lots, spread across 71.3 acres.

The proposed Project would not only take up an additional 20.3 acres of open space in comparison to the Build Pursuant to General Plan, but it would also impose 499 houses in the middle of a rural area– an estimated 1,325 % increase in houses from the intended rural designation of the land use.

While the Aquatic Resource Avoidance Alternative would reduce acreage used to 60.3 for housing– 11 acres less than the No Project / Build Pursuant to General Plan and 31.3 acres less than the Project– it would still impose a huge increase in houses from 35 to 422, an estimated 1,000% increase in houses from the intended rural designation of the land use.

- Why was the following found to be less than significant?

4.10-6: Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.

24-20

BOTH the Project and Aquatic Resource Avoidance Alternative REQUIRE off-site construction through Rural Residential along Sheldon and/or Waterman to connect to utilities, water and sewage. This off-site construction would absolutely have environmental impacts during construction and likely thereafter. Would all storm water drainage stay within the Project property? Storm water drainage within rural Elk Grove is through easements, many of which are maintained by the homeowner.

24-21

- Please explain what *Findings of Fact, a Statement of Overriding Considerations, and a Mitigation Monitoring and Reporting Program* means and how it would apply to the Project:

Letter 24 Cont.

24-21 Cont.

3.6 REQUIRED DISCRETIONARY APPROVALS

Implementation of the Project would require the following discretionary actions by the City of Elk Grove:

- Certification of the EIR, including adoption of Findings of Fact, a Statement of Overriding Considerations, and a Mitigation Monitoring and Reporting Program;

- The following should have been found to be significant and not *less than significant:*

4.9-4 Generation of a substantial permanent increase in ambient noise levels *associated with cumulative development of the Project in combination with future buildout of the City of Elk Grove.*

24-22

This impact should be significant. The EIR does not adequately address the cumulative development in nearby areas of the Project (existing and under construction). Having lived alongside Waterman Road for over 12 years now with direct view of the Project site, we have experienced first-hand, not only the increase in traffic with roadway "improvements" to Sheldon and Waterman Roads (i.e. round-a-bout, road resurfacing, adding center turn/passing lanes on Sheldon Road), but also with increased noise from traffic. Drivers can drive faster on the improved road and are seemingly more impatient as traffic everywhere has worsened. Many drivers prefer driving on the rural roads to avoid all the stop and go of traffic lights, railroad tracks, etc. on the non-rural streets. Increased traffic will absolutely add to a "substantial permanent increase" in noise levels. The 8' sound barrier walls proposed for the Project will do nothing to decrease the increased traffic noise *around* the Project for those living in the rural area.

24-23

- Please address the incorrect information found in Appendix F page 140-141: *"This material flows into the city-operated sewer system"*. The Project would require extensive construction to bring utilities, water and sewage to the Project property.

Letter 24 Cont.

B. WASTEWATER AND STORMWATER MANAGEMENT

Wastewater at the site is limited to effluent from the restrooms and kitchens. This material flows into the city-operated sewer system. No interior floor drains were observed.

Phase I Environmental Site Assessment
9350 Sheldon Road, Elk Grove, CA

Pinnacle Environmental, Inc.
Page 41

[redacted]

Exterior surface run-off from the subject property is expected to flow directly onto the adjoining roadways. No exterior stormwater drains were observed.

C. POTABLE WATER SUPPLY AND SEWER SERVICE

The dwelling on the subject property likely uses a septic system, although details were not provided in the records reviewed. Septic systems, when used for routine sewage, are unlikely to environmentally impact a property significantly. However, PEI is not evaluating the septic

24-23 Cont.

Other Miscellaneous Questions:

24-24

- What impact will building these houses have on our wells *that we maintain* and our water levels? Who accepts the costs for if and when our wells become dry due to lowering water tables related to over-development?

24-25

- How does having a sewage lift system fit into our rural area? Is there a risk of sewage seepage into our well water?

24-26

Thank you for your time and consideration.

James and Kendra Schmidt

LETTER 24: JAMES AND KENDRA SCHMIDT

Response to Comment 24-1
Please see Master Response 1.

Response to Comment 24-2
Please see Master Response 1. Furthermore, as discussed in detail under Impact 4.8-1 (Physically divide an established community) in Chapter 4.8, Land Use and Planning/Population and Housing, the Project would not obstruct any existing or proposed transportation route that provides connectivity in the Rural Area Community Plan area.

Response to Comment 24-3
Please see Master Responses 1 and 2. A detailed discussion of growth-inducing impacts is provided in Chapter 6, Statutorily Required Sections, of the Draft EIR. Project-related traffic and potential traffic safety hazards are evaluated in Chapter 4.11, Transportation, of the Draft EIR. Potential impacts related to noise associated with construction and operation of the Project are addressed in Chapter 4.9, Noise, of the Draft EIR. Potential impacts related to wildlife are addressed in Chapter 4.3, Biological Resources, of the Draft EIR. Potential impacts related to General Plan/Community Plan consistency are address in Chapter 4.8, Land Use and Planning/Population and Housing, of the Draft EIR.

Response to Comment 24-4
A description of the required off-site improvements associated with the Project's water and sewer system can be found in Chapter 3, Project Description, of the Draft EIR. In addition, as described in Chapter 4.10, Public Services and Utilities, of the Draft EIR, installation of the new water supply infrastructure and wastewater conveyance infrastructure would occur either in existing road rights-of-way (ROWs) or in areas proposed for disturbance as part of development of the Project. All potential physical environmental impacts that could result from development of the Project, including the proposed water distribution infrastructure and wastewater conveyance infrastructure, have been evaluated throughout the technical chapters of the Draft EIR. The Project would not require construction of off-site storm drainage improvements, as all drainage facilities would be located on-site, and runoff would outfall to Laguna Creek within the site.

Response to Comment 24-5
Please see Master Response 1.

Response to Comment 24-6
As discussed under Impact 4.8-1 of the Draft EIR, the Project would not obstruct any existing or proposed transportation route that provides connectivity in the Rural Area Community Plan area. Although the Project would include installation of off-site water and sewer lines, the utility lines would be sized to accommodate the proposed on-site development, and would not change the land use conditions in the surrounding community or isolate an existing land use. While the Project would include the development of residential uses on currently undeveloped land, the land use conditions surrounding the site or functionality of surrounding land uses would not be altered as a result of the Project.

In addition, the Project would increase the intensity of development as compared to the current zoning for the site; however, the City's land use designation and zoning of the site is indicative

that the site has been envisioned as an extension of the existing surrounding residential uses. Furthermore, the proposed residential uses and open space areas associated with the Project would be consistent with the low-density residential uses, including age-restricted units, and the open space areas associated with the Elliot Springs SPA Subdivision located to the southwest of the site.

Response to Comment 24-7

Please see Master Response 1 and Response to Comment 24-6.

Response to Comment 24-8

Please see Master Response 1, Master Response 2, and Response to Comment 24-6. A cumulative analysis of noise impacts associated with the Project is provided under Impact 4.9-4 in Chapter 4.9, Noise, of the Draft EIR. As stated specifically on page 4.9-16 of the Noise chapter, the Cumulative setting includes future probable projects in the City anticipated to occur within the Project vicinity, such as the Elliott Springs Subdivision, Summer Park Estates, Pleasant Grove Estates Rezone and Subdivision Map, Summer Flats, Summer Meadows Map and Rezone, and 9826 Bond Road Map projects. Therefore, cumulative development, including the Elliot Springs Subdivision, was included in the cumulative analysis of the Draft EIR.

Response to Comment 24-9

As discussed in Chapter 3, Project Description, of the Draft EIR, the Transportation Impact Analysis (TIA) prepared for the Project by Fehr & Peers evaluates the effects of the Project on traffic operations (automobile delay and roadway capacity) at potentially affected roadways and intersections, which is outside the scope of CEQA as of July 1, 2020 (see CEQA Guidelines Section 15064.3[a] and additional discussion in Chapter 4.11 of the Draft EIR). Despite this, traffic operations were analyzed “outside” of the CEQA process to understand how the surrounding roadway system may be affected by the Project, to determine needed infrastructure upgrades, and to evaluate consistency with applicable General Plan policies related to traffic operations. The TIA identifies the following roadway improvements that would be triggered by the Project under existing plus project and cumulative plus project conditions:

- **Sheldon Road/Waterman Road Roundabout –** Reconfigure the roundabout to a two-lane circulatory design and widen the approaches to accommodate an additional lane for all movements at the intersection. Widening will be limited to the intersection only, with the two lanes tapering off into one lane.
- **Sheldon Road/Bradshaw Road Roundabout –** Reconfigure the roundabout to include two travel lanes in the east-west direction. Widening will be limited to the intersection only, with the two east-west lanes tapering off into one lane.

The physical environmental effects associated with the aforementioned roadway improvements are addressed throughout the Draft EIR and all such impacts, with the exception of temporary construction noise impacts, were determined to be reduced to less-than-significant levels with implementation of mitigation measures. Furthermore, contrary to the assertion of the commenter, the TIA did not determine that traffic signals would be required to accommodate traffic associated with the Project. In addition, as discussed under Impact 4.8-1 of the Draft EIR, the Project, including the aforementioned roadway improvements, would not obstruct any existing or proposed transportation route that provided connectivity in the Rural Area Community Plan.

Response to Comment 24-10
Please see Master Response 1, Master Response 2, and Response to Comment 24-22 below.

Response to Comment 24-11
Please see Master Responses 1 and 2. In addition, as discussed under Impact 4.10-1, in Chapter 4.10, Public Services and Utilities, CCSD has confirmed implementation of required fire protection measures and payment of required fees would ensure the Project's potential impacts on fire protection services would be less than significant.

Response to Comment 24-12
Please see Master Response 1.

Response to Comment 24-13
Please see Master Response 2.

Response to Comment 24-14
Please see Master Response 2.

Response to Comment 24-15
Please see Master Response 2.

Response to Comment 24-16
As discussed in Chapter 4.11, Transportation, of the Draft EIR, the VMT standards of significance include land use limits based on General Plan designation, as well as total VMT limits for the entire City. VMT associated with the Project was adequately analyzed against the applicable LDR land use designation limit of 19.3 daily VMT per service population, as the Project would include development of LDR uses. Furthermore, pursuant to adopted General Plan VMT thresholds, the VMT limit for Rural Residential (RR) uses is 25.2 per service population.

Response to Comment 24-17
Please see Master Response 2.

Response to Comment 24-18
Please see Response to Comment 24-16.

Response to Comment 24-19
Please see Master Responses 1 and 3.

Response to Comment 24-20
Please see Response to Comment 24-4.

In addition, a description of the Project's proposed stormwater drainage system can be found on pages 4.7-20 through 4.7-22 in Chapter 4.7, Hydrology and Water Quality, of the Draft EIR. As discussed therein, runoff from the proposed on-site development and from the surrounding roadways would drain on-site and ultimately outfall to Laguna Creek, which bisects the site.

Response to Comment 24-21

A discussion of the required Findings of Fact and Statement of Overriding Considerations is included in Chapter 1, Introduction and List of Commenters, of this Final EIR. The Findings of Fact and the Statement of Overriding Considerations would be part of the staff report considered by the decision-makers in their deliberations of the Project. The MMRP, included as Chapter 4 of this Final EIR, would include a list of all the mitigation measures required by the Project, and is intended to ensure compliance with mitigation measures during project implementation.

Response to Comment 24-22

As discussed under Impact 4.9-4 in Chapter 4.9, Noise, of the Draft EIR, in order to assess the potential noise impacts due to traffic increases from the Project on the local roadway network under Existing Plus Approved Projects (EPAP) and Cumulative conditions, Saxelby Acoustics calculated noise levels under such conditions at the nearest existing sensitive receptors. According to the Noise Assessment prepared for the Project, noise level increases under EPAP Plus Project conditions would result in a maximum traffic noise level increase of 0.5 dBA, which would be below the applicable +3.0 or +5.0 dBA increase significance criteria. Noise level increases under Cumulative Plus Project conditions would result in a maximum traffic noise level increase of 0.4 dBA, which would be below the applicable increase significance criteria. Thus, the noise level increases associated with the Project under EPAP Plus Project and Cumulative Plus Project conditions would not exceed the applicable threshold, and the potential cumulative impact was determined to be less than significant.

Response to Comment 24-23

The Draft EIR accurately conveys that the site does not currently include utilities infrastructure and is not currently served by a public sewer system.

Response to Comment 24-24

Please see Response to Comment 8-4.

Response to Comment 24-25

All sewer improvements associated with the Project would be constructed in accordance with the California Plumbing Code, adopted pursuant to EGMC Section 16.24.010, as well as SacSewer Standards and Specifications. As such, construction of the proposed on-site lift station and corresponding off-site force main would not result in risks related to sewer seepage into well water.

Response to Comment 24-26

The comment is a conclusion statement.

Letter 25

You don't often get email from jamiethegr8@gmail.com. Learn why this is important
[EXTERNAL EMAIL]

Dear Ms. Killingsworth,

I am writing to express my absolute shock and profound disappointment regarding the proposed Summer Villas at Sheldon Road project. This proposal is entirely unsuitable for this location, and the idea that the City of Elk Grove would even consider it is incredibly upsetting.

The developers are proposing up to 499 single-family homes, a massive, high-density project on land that is currently designated as Rural Residential.

25-1 This is a fundamental betrayal of our General Plan and what the Rural Area designation is meant to protect. It's not just a small tweak; they are asking for a complete and total overhaul of the land use designation and a corresponding rezone to essentially cram 499 houses where they absolutely do not belong.

The request to strip the site of its Rural Area status to allow for Low Density Residential is a huge red flag.

This area has historically been utilized for grazing and acts as a buffer. If we allow this one parcel to be removed from the Rural Area, it sets a dangerous and unacceptable precedent for every other rural-designated parcel in the city. This would essentially open the door for a complete erosion of our rural identity.

Furthermore, carving out the acres of Open Space along the Laguna Creek corridor for this development is extremely alarming. The creek corridor and the land under the power lines are critical environmental and open space resources.

25-2 Developing right up to these sensitive areas will inevitably lead to environmental degradation, increased runoff, and a loss of natural habitat that we simply cannot get back.

The scale and scope of this project, nearly 500 homes, will generate an enormous amount of traffic on Sheldon Road and surrounding streets, which are not designed to handle that kind of daily volume.

This isn't just an "active adult community"….it's a huge, high-density subdivision that will strain public resources and infrastructure.

25-3 This project is simply the wrong development in the wrong location. It completely contradicts the spirit and letter of the existing General Plan.

I urge you and the city staff to reject the developer's request for a General Plan Amendment and rezone, and to deny this proposal outright!

The integrity of our Rural Area must be protected.

Sincerely,
Jamie Olson

LETTER 25: JAMIE OLSON

Response to Comment 25-1
Please see Master Response 1.

Response to Comment 25-2
Please see Master Responses 1 and 2. Detailed discussions on the Project's impact on biological resources can be found in Chapter 4.3, Biological Resources, of the Draft EIR. In addition, Chapter 4.5, Geology and Soils, and Chapter 4.7, Hydrology and Water Quality, of the Draft EIR, contain detailed discussions regarding the impacts of increased runoff.

Response to Comment 25-3
Please see Master Response 1.

Letter 26

From: City of Elk Grove
To: Christal Love-Lazard; Kyra Killingsworth
Subject: Website Comment Submission for Summer Villas at Sheldon
Date: Friday, October 31, 2025 11:08:02 AM

You don't often get email from noreply@elkgrove.gov. Learn why this is important

[EXTERNAL EMAIL]

Submitted on Fri, 10/31/2025 - 11:07

Submitted by: Anonymous

Submitted values are:

Name
Kimberly Lemar Paulson

Email
kmbrly75@gmail.com

Phone
5108670219

Comments/Questions
This are was zoned rural for a reason, people moved to the area because of that. There are other areas of town that denser homes can be built. Stick to the zoning and rebuts this proposal. People who already live in the area, myself included, enjoy the rural side of town and this will change that character forever. I know it's a long-shot, but please do the right thing and uphold the original zoning plan.

26-1

LETTER 26: KIMBERLY LEMAR PAULSON

Response to Comment 26-1

Please see Master Response 1.

Letter 27

From: City of Elk Grove <noreply@elkgrove.gov>
Sent: Thursday, November 6, 2025 11:38 AM
To: Christal Love-Lazard <clazard@elkgrove.gov>; Kyra Killingsworth <kkillingsworth@elkgrove.gov>
Subject: Website Comment Submission for Summer Villas at Sheldon

[EXTERNAL EMAIL]

Submitted on Thu, 11/06/2025 - 11:37

Submitted by: Anonymous

Submitted values are:

Name
Lea

Email
Keyhole310@ail.com

Phone
9167694428

Comments/Questions
You people just keep going on the whole city of Elk Grove. I say no appt there because you have to many house and all the rural areas in the city of elk Grove are almost gone and you just keep going and going and going it's getting to the point that people are just leaving the city of elk Grove so that you people can just keep crowding the city and making it to where it used to be only 10 minutes to get to elk Grove now it's taking a half an hour to 30 minutes to get there the traffic is astronomical. There's no police that are supervising the whole role area of elk Grove. They are flying down the roads they don't care about anything. You have people that don't know anything about animals that are now coming out to the rule areas blowing off their fireworks have no respect for any morals of this whole town anymore so it would be nice if you keep your crap somewhere else and quit building and allow people to bring these kids up with animals, dogs, cats, horses cows anything that will keep these kids from going to drugs or alcohol or just plain ass getting in trouble. Hope that you guys understand that the rule area people don't need the city folk coming out anymore. You're just ruining this whole town.

27-1

By sending us an email (electronic mail message) or filling out a web form, you are sending us personal information (i.e. your name, address, email address or other information). We store this information in order to respond to or process your request or otherwise resolve the subject matter of your submission.

Certain information that you provide us is subject to disclosure under the California Public Records Act or other legal requirements. This means that if it is specifically requested by a member of the public, we are required to provide the information to the person requesting it. We may share personally identifying information with other City of Elk Grove departments or agencies in order to respond to your request. In some circumstances we also may be required by law to disclose information in accordance with the California Public Records Act or other legal requirements.

LETTER 27: LEA

Response to Comment 27-1

Please see Master Response 1.

Letter 28

Submitted on Fri, 10/31/2025 - 10:00

Submitted by: Anonymous

Submitted values are:

Name
Lima Huy

Email
limahuy@gmail.com

Phone
9167967001

Comments/Questions

28-1 As a nearby resident, I oppose this project. Please keep this area rural and maintain the characteristics of the community. Thanks.

1

LETTER 28: LIMA HUY

Response to Comment 28-1

Please see Master Response 1.

Letter 29

November 24, 2025

To: Kira Killingsworth Senior Planner

Regarding: Summer Villas Special Planning area DEIR

29-1 Thank you for the opportunity to comment on the Draft EIR. My comments are in reference to chapter 4.7.

29-2 The evaluation of flood risk and safety to the community and surrounding areas is limited by the lack of a detailed development plan. No assurances can be made a developed development plan could be supported by this DEIR. To simply suggest the City of Elk Grove's General Plan policies provide protection against hazardous and life-threatening flooding based upon subjective language is at a great risk to the community and environment.

29-3 Absent from the document is cumulative impacts to the surrounding community and the safety of the community.

29-4 Allowable flooding of roadways eliminates the evacuation by vehicle of the community members and is not safe.

29-5 The City of Elk Grove has allowed development in the flood plain such that when rain events have occurred neighborhood drainage systems have been overwhelmed. How has the past events of flooding been identified and resolved within this DEIR.

29-6 Again, it is very concerning that no assurances of safety from flooding and the results of flooding can be stated in this DEIR.

29-7 The proposed project is inconsistent with the current General Plan in terms of density and consequently will require the extension of water and sewer into the Rural Area. If the project is approved, it is considered growth inducing and will set a precedent for introducing urban utility services into the Rural Area.

How is this being justified? How are the costs of such a project being justified?

I look forward to a response,

Sincerely,

Lynn Wheat
Elk Grove Resident
Wheat91@yahoo.com

LETTER 29: LYNN WHEAT

Response to Comment 29-1

The comment is introductory to the remainder of the comment letter. Please see the following responses to specific comments.

Response to Comment 29-2

As discussed in Chapter 1, Introduction, of the Draft EIR, the Draft EIR was prepared as a program-level EIR pursuant to CEQA Guidelines Section 15168. In addition, CEQA Guidelines provide: "an evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible" (CEQA Guidelines, Section 15151). Also, "the degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR" (CEQA Guidelines, Section 15146). This section specifically notes that, "an EIR on a project such as the adoption or amendment of a comprehensive zoning ordinance . . . should focus on the secondary effects that can be expected to follow from the adoption or amendment, but the EIR need not be as detailed as an EIR on the specific construction projects that might follow" (CEQA Guidelines, Section 15146[b]).

As described in the Draft EIR, a program-level analysis for the Project was appropriate because:

- Site-specific details, including development proposals, are not available at this time;
- The General Plan/Rural Area Community Plan Amendment, Rezone, EGMC Text Amendment, and SPA Ordinance cover a defined geographic area, with similar land use characteristics; and
- A program-level analysis provides the City with the opportunity to consider "broad policy alternatives and program-wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts" (CEQA Guidelines Section 15168(b)(4).

Furthermore, as discussed in Chapter 3, Project Description, of the Draft EIR, while specific 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 CEQA review 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 housing community would occur if the SPA is approved by the Approval Authorities. As such, the Draft EIR evaluated the impacts associated with approval of the General Plan/Rural Area Community Plan Amendment, Rezone, EGMC Text Amendment, and Summer Villas SPA, as well as subsequent potential development of the 115.9 site with a maximum of 499 age-restricted (55+) single-unit residences, as well as various associated improvements, such as a private community recreation center/clubhouse, private park space, trails, private and public open space areas, landscaping, and a number of on- and off-site roadway and utility improvements. Therefore, the Draft EIR was conducted in accordance with CEQA guidelines and provided a conservative analysis of potential development on the site.

Response to Comment 29-3

A cumulative impact discussion is included in Chapters 4.1 through 4.11 of the Draft EIR. In addition, additional information on the scope of the cumulative impact analysis conducted for each environmental issue area addressed in the Draft EIR can be found in Section 6.3 of Chapter 6, Statutorily Required Sections, of the Draft EIR.

Response to Comment 29-4

Please see Responses to Comments 5-14, 5-22, and 9-10.

Response to Comment 29-5

Please see Master Response 1. Discussions regarding impacts related to flooding can be found in Chapter 4.7, Hydrology and Water Quality, of the Draft EIR. Implementation of the mitigation measures set forth in the above-mentioned chapter would ensure that the Project would not create or contribute runoff water that would exceed the capacity of the City's stormwater drainage systems.

Response to Comment 29-6

Please see Response to Comment 29-5.

Response to Comment 29-7

Please see Response to Comment 5-29. A discussion of growth-inducing impacts associated with the Project can be found in Chapter 6, Statutorily Required Sections, of the Draft EIR. As discussed therein, the improved water and wastewater systems would be designed to accommodate the increased demand from the future development of the Summer Villas SPA. In addition, the City's General Plan prohibits connection of the aforementioned water and wastewater systems to areas within the Rural Area Community Plan adjacent to the site. Any such connection to City services would be subject to a General Plan/Rural Area Community Plan Amendment. The proposed water and wastewater improvements would be financed by the Project Applicant. The improvements are intended to connect the site to existing infrastructure in order to provide service to the Project and are not anticipated or intended to serve any other areas or projects. However, because the ultimate design of the infrastructure improvements has not been determined at this time, the potential exists for such improvements to be sized such that they could accommodate additional demand beyond that of the Project only, which could potentially foster unplanned population growth in the area.

Letter 30

November 24, 2025

Kyra Killingsworth – Senior Planner
City of Elk Grove Development Services Department
8401 Laguna Palms Way
Elk Grove, CA 95758
kkillingsworth@elkgrove.gov

Re: Comments on the DEIR for the Summer Villas SPA Project (SCH# 2024080407)

Dear Ms. Killingsworth:

30-1 The following comments pertain to the Draft Environmental Impact Report ("DEIR") for the Summer Villas Special Planning Area Project ("Project"). We are concerned that the DEIR does not meet several important requirements of the California Environmental Quality Act ("CEQA"), especially in areas such as narrowly defined project objectives, the potential erosion of protections for rural Elk Grove, consistency with General Plan policies, effects on the rural community, evaluation of alternative locations, possible growth inducement, traffic considerations, and the absence of a clear and consistent project description.

1. Project Objectives

30-2 Some project goals are too limited and seem intended to rule out valid alternatives. Even though the site covers 115.9 acres, only a portion is needed for development; the project could be built on a smaller less environmentally sensitive site. The rural location should not restrict the consideration of alternative sites, as it actually increases the Project impacts. Preserving the Laguna Creek corridor is a consequence of impacting adjacent lands, not a true project objective. Similarly, "feathering" intensity is a tactic for compatibility, not a legitimate objective. These should be revised, and several off-site alternative locations should evaluate to reduce the numerous Significant and Unavoidable impact of the Project.

2. Inadequate Protection of Rural Elk Grove and General Plan Policy Consistency

30-3 The Project site is located within the City's Rural Area Community Plan and is currently designated as Rural Residential (RR) and zoned Agricultural Residential-Two Acre Minimum (AR-2). The Project proposes to remove the site from the Rural Area Community Plan and rezone it for higher-density residential development (up to 499 units), fundamentally altering the rural character of the area.

The DEIR acknowledges that the Project would "substantially degrade the existing visual character or quality of views of the site and its surroundings" and that this impact is

Letter 30 Cont.

"significant and unavoidable." However, the DEIR fails to adequately analyze or mitigate the Project's inconsistency with General Plan policies intended to protect rural character, including but not limited to:

- **Policy NR-1-9:** "Clustering shall not be allowed in the Rural Area." The Project relies on clustering to achieve its density, directly conflicting with this policy.
- **Policy NR-1-2 and NR-1-4:** Require preservation and enhancement of natural areas and avoidance of impacts to wetlands and riparian areas unless infeasible. The Project's conversion of open space and potential impacts to Laguna Creek are not sufficiently avoided or mitigated.
- **Rural Area Community Plan policies:** The DEIR dismisses these as not adopted for environmental protection, but they are integral to the City's planning framework and rural preservation goals.

30-3 Cont.

The DEIR's claim that the Project aligns with the General Plan lacks substantial evidence and does not address key policy conflicts. It also fails to fully assess how removing the project site will affect nearby properties still designated as Rural Area. The Project is bordered by agricultural residential zones on all sides.

30-4

2. Divided Communities

The Project fundamentally disrupts the integrity of Elk Grove's Rural Area by carving out 116 acres of land historically designated for two-acre agricultural residential lots and converting it into a high-density, age-restricted subdivision of up to 499 homes. This transformation severs the continuity of the rural landscape, replacing open grazing lands and large-lot homesteads with clustered development and urban-style infrastructure. By removing the site from the Rural Area Community Plan and introducing urban design standards, the Project creates a physical and visual barrier between long-established rural neighborhoods and the remaining countryside, eroding the sense of place and community cohesion that the City's General Plan has long promised to protect.

30-5

The California Environmental Quality Act (CEQA) requires agencies to evaluate whether a proposed project would physically divide an established community. This is one of the land use and planning thresholds of significance in Appendix G of the CEQA Guidelines.

- Physical Division refers to creating barriers—such as new highways, rail lines, major arterials, or large-scale developments—that separate neighborhoods or disrupt social and economic connections.

Letter 30 Cont.

30-5 Cont.

- The concern is that such projects can fragment communities, reduce access to essential services, and erode cultural or social cohesion.

3. Alternatives Analysis

30-6

The justification for dismissal of need to consider Off-Site Alternatives relied upon project objectives specific to the 115.9-acre site and the site's location within the Sheldon area of northeastern Elk Grove and providing open space to preserve the Laguna Creek corridor. As stated above, these project objectives are flawed. Further, they are inconsistent with the purpose of CEQA and do not meet the rule of reason.

4. Growth-Inducing Impacts and Urban Sprawl

30-7

The DEIR concedes that the Project would induce "substantial unplanned population growth" and that this impact is "significant and unavoidable." The Project would add 499 residential units—far exceeding the 35–58 units anticipated under the existing Rural Residential designation—and would require major infrastructure extensions (water, sewer, roads) into a rural area.

The DEIR's growth-inducing analysis is inadequate because:

30-8

- It fails to analyze the secondary impacts of extending infrastructure, which could facilitate further urbanization of adjacent rural lands.

30-9

- It does not adequately address the cumulative effect of this and other projects in the Rural Area Community Plan, which together would exceed the growth projections in the City's General Plan and the SACOG MTP/SCS.

30-10

- The DEIR does not propose enforceable measures to prevent further extension of utilities or to limit future development beyond the Project site.

30-11

- The DEIR does not acknowledge or evaluate that the sizing of the wet utility infrastructure shown in the project documentation is far larger than needed for 499 units. Or that the routing which would serve large blocks of land that are intended to remain within the Rural Area Community Plan.

5. Traffic Impacts and Inadequate Mitigation

30-12

The DEIR identifies significant and unavoidable impacts related to vehicle miles traveled (VMT) and traffic noise during construction. The Project would increase VMT per service population above the City's thresholds and would contribute to cumulative traffic impacts on Sheldon Road, Waterman Road, and other rural roadways. VMT impacts directly result

Letter 30 Cont.

30-12 Cont. from the Project location, "within the Sheldon area of northeastern Elk Grove," which is further justification for evaluation of Off-Site Alternatives.

Shortcomings include:

30-13
- The DEIR relies on Transportation Demand Management (TDM) strategies whose effectiveness is unproven and cannot be guaranteed, as acknowledged in the document.

30-14
- The Project would require substantial off-site roadway improvements, but the DEIR does not analyze the full range of secondary impacts (e.g., induced demand, safety for rural road users, impacts to equestrian and bicycle access).

30-15
- The DEIR does not provide a robust analysis of alternatives that would reduce VMT or traffic impacts, such as a Rural Preservation Alternative or reduced-density alternative.

6. Lack of a Clear and Stable Project Description

CEQA requires a stable, finite, and accurate project description. The DEIR describes the Project as a "program-level EIR" with no specific development proposal, yet it analyzes impacts based on the "reasonable assumption" of 499 units and associated infrastructure. This approach is problematic because:

30-16
- The SPA does not entitle any specific development, and future proposals could differ substantially from the assumptions used in the DEIR.
- The DEIR defers critical details (e.g., final site plans, infrastructure alignments, mitigation measures) to future approvals, undermining meaningful public review and environmental analysis.
- The DEIR's reliance on program-level analysis is inappropriate given the specificity of the impacts and the irreversible commitment of resources.

7. Failure to Adequately Analyze and Mitigate Cumulative Impacts

30-17 The DEIR repeatedly concludes that significant and unavoidable impacts (visual character, growth inducement, VMT, noise) cannot be mitigated but does not adequately explore feasible alternatives or mitigation measures. For example:

30-18
- The Rural Preservation Alternative is dismissed without detailed analysis.

30-19
- The Aquatic Resource Avoidance Alternative is not fully developed or evaluated for its potential to reduce impacts to rural character and growth inducement.

Letter 30 Cont.

30-20

- The DEIR does not consider enforceable growth boundaries, infrastructure phasing, or conservation easements as mitigation.

8. Areas of Controversy/Significant and Unavoidable Impacts

The DEIR highlights 73 areas of controversy, many of which are not thoroughly addressed in its analysis. Even after mitigation efforts, numerous evaluated impacts remain significant and unavoidable.

A. Aesthetics

- **Impact AES-4.1-1:** Substantial degradation of existing visual character or quality of the site and its surroundings.
- **Impact AES-4.1-3:** Creation of a new source of substantial light or glare that would adversely affect day or nighttime views.
- **Impact AES-4.1-4:** Long-term changes in visual character associated with cumulative development of the Project in combination with future buildout of the City of Elk Grove.
- **Impact AES-4.1-5:** Creation of new sources of light or glare associated with cumulative development of the Project in combination with future buildout of the City of Elk Grove. Based on the analysis below and with implementation of mitigation, the project's incremental contribution to the significant cumulative impact is *less than cumulatively considerable*.

30-21

B. Air Quality & Greenhouse Gas Emissions

- **Impact AQ-4.2-7:** Generation of GHG emissions that may have a significant impact on the environment or conflict with an applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

D. Land Use and Planning/Population and Housing

- **Impact LU-4.8-3:** Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (e.g., through projects in an undeveloped area or extension of major infrastructure).
- **Impact LU-4.8-5:** Cumulative unplanned population growth.

Letter 30 Cont.

F. Noise

- **Impact NOI-4.9-1:** Generation of a substantial temporary increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

30-21 Cont.

G. Transportation

- **Impact Trans 4.11-4:** Conflict or be inconsistent with CEQA Guidelines Section15064.3, subdivision (b). Vehicle Miles Traveled (VMT) exceeding CEQA thresholds for residential projects.

Conclusion

30-22

For the reasons stated above, the DEIR fails to comply with CEQA's requirements for a full and adequate analysis of the Project's impacts on rural Elk Grove, General Plan consistency, growth inducement, traffic, and project definition. We urge the City to revise and recirculate the DEIR to address these deficiencies, provide a clear and stable project description, and fully analyze feasible alternatives and mitigation measures that would protect the rural character and integrity of Elk Grove.

Thank you for your consideration of these comments.

Sincerely,

Managing Partner - John Campbell
Ranches

LETTER 30: MANAGING PARTNER OF JOHN CAMPBELL RANCHES

Response to Comment 30-1

The comment is introductory to the remainder of the comment letter. Please see the following responses to specific comments.

Response to Comment 30-2

The Project Objectives are provided by the Applicant. Even if the Applicant provided revisions to the objectives, the revisions to the Project Objectives would not change the analysis or conclusions of the Draft EIR. Chapter 7, Alternatives Analysis, of the Draft EIR considered an Off-Site Alternative, but dismissed the alternative from detailed analysis. As discussed therein, the CEQA Guidelines (Section 15126.6[b]) requires that only locations that would avoid or substantially lessen any of the significant effects of the Project need be considered for inclusion in the Draft EIR. An Off-Site Alternative would involve the construction of the Project on an alternative location and would have the same type and intensity of uses as the Project.

Response to Comment 30-3

Please see Master Response 1 related to community character. Furthermore, Chapter 4.8, Land Use and Planning/Population and Housing, of the Draft EIR focuses on Project consistency with General Plan policies adopted for the purpose of avoiding or mitigating an environmental effect. While the site is located within the Rural Area Community Plan area, the policies for the Community Plan area are intended to recognize and support the continuation of the rural lifestyle and agricultural heritage necessary to preserve the character of the area. The Project would require a General Plan/Rural Area Community Plan Amendment to remove the site from the Rural Area Community Plan.

Response to Comment 30-4

Please see Response to Comment 30-3. In accordance with the requirements of CEQA, the potential physical environmental impacts of the Project upon adjacent properties were evaluated throughout the Draft EIR.

Response to Comment 30-5

Please see Response to Comment 30-3. While Appendix G of the CEQA Guidelines does include a land use and planning threshold of significance related to physically dividing an established community, which is addressed under Impact 4.8-1 of the Draft EIR, the disruption of social and economic connections is not considered under CEQA. As discussed under Impact 4.8-1 of the Draft EIR, the Project would increase the intensity of development as compared to what was originally zoned for the site; however, the City's planned development of the site is indicative that the site has been envisioned as a continuation of residential uses. Furthermore, the proposed residential uses and open space areas associated with the Project would be consistent with the low-density residential uses, including age-restricted units, and the open space areas associated with the Elliot Springs Subdivision located to the southwest of the site. The Project would not obstruct any existing or proposed transportation route that provides connectivity in the Rural Area Community Plan area. While the Project would include the development of residential uses on currently undeveloped land, the land use conditions surrounding the site or functionality of surrounding land uses would not be altered as a result of the Project. Therefore, the Project would not physically divide an established community. Pursuant to CEQA Guidelines Section 15382, an economic or social change by itself shall not be considered a significant effect on the environment. While a social or economic change related to a physical change may be considered in determining

whether the physical change is significant, as discussed above, physical impacts related to dividing an established community would be less than significant.

Furthermore, the existing connection between the surrounding Rural Area is Sheldon Road, which would not be altered as part of the Project. Thus, the Project would not result in any substantial changes related to connectivity within the Rural Area. The Project would also include a publicly accessible multi-use trail connection that would run north-south, parallel with Waterman Road, which would provide more connectivity within the Rural Area, rather than hindering connectivity.

Response to Comment 30-6

Please see Response to Comment 30-2.

Response to Comment 30-7

The comment provides a summary of the commenter's concerns related to growth-inducement. Please see Responses to Comments 30-8 through 30-11 below.

Response to Comment 30-8

Please see Response to Comment 5-29. In addition, Chapter 6, Statutorily Required Sections, of the Draft EIR includes an analysis of the effects of extending utility infrastructure to the Project. As discussed therein, the improvements are intended to connect the site to existing infrastructure in order to provide service to the Project and are not anticipated or intended to serve any other areas or projects.

Response to Comment 30-9

An analysis of cumulative unplanned population growth is included under Impact 4.8-5 in Chapter 4.8, Land Use and Planning/Population and Housing, of the Draft EIR. As concluded therein, the incremental contribution of the Project to the significant cumulative impact associated with planned and potential development in the City of Elk Grove and the Rural Area Community Plan would be cumulatively considerable and significant and unavoidable.

Response to Comment 30-10

Please see Response to Comment 32-3.

Response to Comment 30-11

As discussed in Chapter 6, Statutorily Required Sections, of the Draft EIR, the Project would include off-site improvements to utilities and roundabouts in the surrounding area. The City's General Plan prohibits connection of the proposed water and wastewater systems to areas within the Rural Area Community Plan adjacent to the site. Any such connection to City services would be subject to approval of a General Plan/Rural Area Community Plan Amendment. In addition, the proposed utility and roundabout approvements would be sized to serve only the increased demand from the future development of the Summer Villas SPA.

Any associated connections to water or sewer services would be subject to approval of a General Plan/Rural Area Community Plan Amendment. Furthermore, it would be speculative to attempt to predict where and how much future development could occur as a direct result of the Project. Any such future development would require submittal of an application to the City, as well as CEQA review, and public hearings before the decision-makers. Therefore, the Project would not encourage or facilitate other activities that could significantly affect the environment.

Response to Comment 30-12

While the Draft EIR concluded the temporary noise increase associated with construction of the off-site improvements would be significant and unavoidable, the Draft EIR did not identify a significant and unavoidable impact related to traffic noise during construction. Please also see Master Response 2 related to traffic.

Response to Comment 30-13

As noted by the commenter, the effectiveness of the TDM strategies required pursuant to Mitigation Measure 4.11-4 to reduce VMT associated with the Project is uncertain, and, therefore, impacts related to VMT were determined to be significant and unavoidable. In addition, as discussed on page 7-5 in Chapter 5, Alternatives Analysis, of the Draft EIR, an Off-Site Alternative was considered but dismissed from detailed analysis due to the fact that an Off-Site Alternative would fail to meet the objectives of the Project and would not avoid or substantially lessen the significant effects of the Project. In addition, the alternative sites identified to be large enough to accommodate the Project would not require a Rezone and a General Plan Amendment in order to be developed with residential uses, and the applicant does not own any of the identified alternative sites that would be adequate to construct the Project.

Response to Comment 30-14

The physical environmental impacts associated with development of off-site infrastructure improvements are evaluated in Chapters 4.1 through 4.11 of the Draft EIR. Please also see Master Response 2.

Response to Comment 30-15

Please see Master Response 2 related to traffic and Master Response 3 regarding alternatives. Chapter 7, Alternatives Analysis, of the Draft EIR did include consideration of an Increased Density Alternative, which would be sufficient in reducing VMT to a less-than-significant level. However, an Increased Density Alternative would not meet the requirements of CEQA Guidelines Section 15126.6(c) due to failure to meet most of the basic project objectives, infeasibility, and inability to avoid the majority of significant environmental impacts. Therefore, an Increased Density Alternative was dismissed from detailed analysis within the Draft EIR.

Furthermore, similar to the alternative suggested by the commenter, the Draft EIR included an analysis of a No Project (Buildout Pursuant to General Plan) Alternative. As discussed on page 7-14, the Alternative would not cause the cumulative daily total VMT within the City to exceed the cumulative General Plan Buildout VMT limit. However, although the Alternative would involve a similar vehicle trip length as the Project, because the Alternative would not include development of age-restricted units, the daily vehicle trip rate would be higher under the Alternative. As a result, the daily VMT per capita would be greater than the Project. Thus, similar to the Project, the No Project (Buildout Pursuant to General Plan) Alternative would still be expected to exceed the per capita Project-level VMT per service population limit.

Response to Comment 30-16

As discussed in Chapter 1, Introduction, of the Draft EIR, the Draft EIR was prepared as a *program-level EIR* pursuant to CEQA Guidelines Section 15168. According to CEQA Guidelines Section 15168(a), a program-level EIR is an EIR that may be prepared on a series of actions that could be characterized as one large project and are related either: 1) geographically; 2) as logical parts in the chain of contemplated actions; 3) in connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program; or 4) as individual



activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

In addition, it is noted that CEQA Guidelines provide: "an evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible" (CEQA Guidelines, Section 15151). Also, "the degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR" (CEQA Guidelines, Section 15146). This section specifically notes that, "an EIR on a project such as the adoption or amendment of a comprehensive zoning ordinance . . . should focus on the secondary effects that can be expected to follow from the adoption or amendment, but the EIR need not be as detailed as an EIR on the specific construction projects that might follow" (CEQA Guidelines, Section 15146[b]). A program-level analysis for the Project is appropriate in this EIR because:

- Site-specific details, including development proposals, are not available at this time as the owner has not submitted these entitlements to the City;
- The General Plan/Rural Area Community Plan Amendment, Rezone, Elk Grove Municipal Code (EGMC) Text Amendment, and Special Planning Area (SPA) Ordinance; and
- A program-level analysis provides the City with the opportunity to consider “broad policy alternatives and program-wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts” (CEQA Guidelines Section 15168(b)(4).

As discussed in Chapter 3, Project Description, of the Draft EIR, 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 115.9 site with a maximum of 499 age-restricted (55+) single-unit residences, 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. Accordingly, the total number of units would not be allowed to exceed 499 units as stated in the SPA. The SPA does not entitle any specific development; therefore, any successive approvals from the City would be required, including, but not limited to Tentative Map, Final Map, Improvement Plans, Grading Permits, Building Permits, Encroachment Permits, and Design Review.

Response to Comment 30-17

Please see Master Response 3 regarding the selection of additional alternatives. Furthermore, feasible mitigation measures that would reduce impacts related to visual character, VMT, or construction noise to less-than-significant levels were not identified. While Chapter 6, Statutorily Required Sections, of the Draft EIR determined that the Project could result in growth-inducing impacts, the CEQA Guidelines are clear that, while an analysis of growth-inducing effects is required, growth in any area shall not be assumed to be necessarily beneficial, detrimental, or of little significance to the environment.

Response to Comment 30-18

The Draft EIR included an analysis of a No Project (Buildout Pursuant to General Plan) Alternative in Chapter 7, Alternatives Analysis. Please also see Master Response 3.

Response to Comment 30-19

Please see Master Response 3 and Responses to Comments 30-3 and 30-8 through 30-11.

Response to Comment 30-20

Please see Response to Comment 30-17. Mitigation measures related to enforcing growth boundaries and infrastructure phasing would not be required to reduce the identified physical environmental impacts associated with the Project. Conservation easements related to preservation of habitat for special-status species are included as mitigation measures in Chapter 4.3, Biological Resources, of the Draft EIR.

Response to Comment 30-21

All areas of controversy listed in Chapter 2, Executive Summary, of the Draft EIR that are relevant to the environmental analysis under CEQA are addressed throughout the Draft EIR. The comment summarizes the conclusions of the Draft EIR and reiterates the impacts determined to be significant and unavoidable. The comment does not address the adequacy of the Draft EIR.

Response to Comment 30-22

The comment is a conclusion statement.

Letter 31

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[EXTERNAL EMAIL]

City of Elk Grove

Attn: Kyra Killingsworth, Senior Planner

8401 Laguna Palms Way

Elk Grove, CA 95758

Email: kkillingsworth@elkgrove.gov

Fax: (916) 478-3684

Re: Opposition to Summer Villa's Project (APN 127-0010-077)

31-1

When we moved to Elk Grove 25 years ago one thing that really attracted us was the commitment the city made to maintain the rural character of our city even as the Elk Grove was one of the fastest growing cities in the country. Approval of the Summer Villa's Project will damage the relationship between the city leadership and the residents of Elk Grove as it puts the developers before the residents. Once again the commitment was made to maintain the rural area 25 years ago and recertified at least twice since then.

The project site is surrounded on all sides with rural residential homes. What makes the council think they can wave a magic wand and turn that piece of property into an urban village? The project needs to be stopped.

31-2

In the draft EIR there are many issues with "resolutions" which make the project managers happy although they don't have to live in the area. There are eight significant and unavoidable impacts the EIR identifies which have no resolution. How many is enough? Here is the list:

Impact 4.1-1 Visual degradation in a non-urbanized area. Once the visuals are changed in an area there is no turning back.

Impact 4.1-3 Substantial Light/Glare pollution. We add more and more light to our communities that make us feel better but damage the wildlife around us. Who believes that is OK?

Impact 4.1-4 Cumulative loss of rural visual character. Ask any Elk Grove resident where they might go if they want to get away from town. They sure aren't going to head down Laguna or Elk Grove Blvd. Our city has been blessed with a significant rural area-Why would we want to change it?

Impact 4.2-7 GHG Emissions conflicting with climate policy. With the World in turmoil over a changing climate why would we believe we are exempt from doing our part?

Letter 31 Cont.

31-2 Cont.

Impact 4.8-3 and 4.8-5 Unplanned population growth. Look around not just Elk Grove but the surrounding cities. Once growth starts the need for more housing creates a need for more money in city coffers causing population growth. Our city does not have the infrastructure for more people in the East Elk Grove Area without significant changes.

Impact 4.9-1 Excessive Ambient Noise. Compare the noise levels in the rural parts of Elk Grove to the Laguna Area. Once the housing is constructed the noise does not go away.

31-3

Impact 4.11-4 CONFLICT WITH CEQA transportation guidelines. If the project falls outside of CEQA Guidelines why is it even being considered?

31-4

These are just a few of the areas the EIR recognizes as significant. How many more are part of a 600 page document that are not singled out?

31-5

This project has too many flaws to move forward.

Regards,

Mark and Jane White

8890 Saint Anthony Court

Elk Grove, CA 95624

LETTER 31: MARK AND JANE WHITE

Response to Comment 31-1
Please see Master Response 1.

Response to Comment 31-2
Please see Master Response 1.

Response to Comment 31-3
CEQA Guidelines Section 15064.3, subdivision (b), describes the specific considerations for evaluating a project's transportation impacts. In particular, CEQA Guidelines Section 15064.3, subdivision (b), states that VMT exceeding an applicable threshold of significance may indicate a significant impact. A discussion regarding the Project's consistency with CEQA Guidelines Section 15064.3, subdivision (b), can be found on pages 4.11-23 through 4.11-29 in Chapter 4.11, Transportation, of the Draft EIR.

Response to Comment 31-4
Please see Master Response 1.

Response to Comment 31-5
Please see Master Response 1.

Letter 32

From: Matthew Arnold <arnold.matthew@yahoo.com>
Sent: Wednesday, November 19, 2025 11:48 AM
To: Kyra Killingsworth <kkillingsworth@elkgrove.gov>
Cc: EG City Clerk <cityclerk@elkgrove.gov>
Subject: CEQA Comment – Summer Villas SPA (SCH No. 2022090474) – General Plan Inconsistencies & Policy Conflicts

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[EXTERNAL EMAIL]

Dear Ms. Killingsworth,

32-1 I am submitting the following formal comments on the Summer Villas Special Planning Area Draft Environmental Impact Report (SCH No. 2022090474). These comments focus on General Plan inconsistencies, policy conflicts, and unanswered technical questions that must be addressed in the Final EIR before any consideration of a General Plan Amendment or project approval.

General Plan Policy Conflicts

32-2 **LU-3-1 – "Preserve the unique character of rural areas, including the preservation of agricultural uses, open space, a rural lifestyle, and opportunities for rural living."**
The proposed Summer Villas development seeks to establish approximately 10 dwelling units per acre, a density characteristic of suburban subdivisions within an Agricultural Residential designated area, where surrounding parcels are predominantly 2-acre rural lots. This disparity undermines the fundamental intent of Policy LU-3-1.

Key Conflicts with LU-3-1:

32-3 - **Urban Encroachment in a Rural Zone:** The project site is surrounded by existing 2-acre lots in the Sheldon rural area. Introducing suburban-scale density into an area explicitly protected for its rural identity sets a precedent for future upzoning.

32-4 - **Loss of Rural Character and Lifestyle:** Rural communities are defined by larger setbacks, open viewsheds, low traffic volumes, and agrarian activity. Packing approximately 10 homes per acre will irreversibly alter the rural form, increase noise and light pollution, and degrade the open space that defines Sheldon.

32-5 - **Land Use Incompatibility:** Adjacent rural lots were developed with the expectation of General Plan protection. Inserting high-density development contradicts principles of compatible scale, land use transition, and neighborhood cohesion.
- **Risk of Policy Erosion:** Amending the General Plan for a single project undermines its purpose. If compromised here, similar arguments could follow for other rural parcels.

LU-3-3 and LU-3-5 – Discourage urban service extensions and prohibit municipal sewer and water in rural zones
The proposal's 18-inch sewer line and new pump station planned along Sheldon Road directly contradict these policies. Extending urban infrastructure through a protected rural area violates long-standing land use boundaries and unlocks development potential in adjacent parcels, enabling further urbanization.

32-6 **INF-1-6 and INF-1-8** also prohibit municipal utility extensions into the Rural Area to protect land use character. The proposal introduces permanent infrastructure that invites urban development, risking further encroachment into protected rural zones.

LU-2-1 – Promote infill development within the Urban Services Boundary
While the project is technically inside the USB, it leapfrogs existing urban areas and is surrounded by low-density rural parcels. It requires brand-new infrastructure, inconsistent with the intent of compact, efficient infill development.

Key Issues:

Letter 32 Cont.

1. **Leapfrog, not Infill:** The site is disconnected from existing urban neighborhoods and service corridors.
2. **New Infrastructure Obligations:** Roads, water, sewer, and drainage systems must be extended into rural land.
3. **Contradicts Regional Growth Policies:** SACOG and Elk Grove emphasize sustainable growth and infill. This project undermines those goals.
4. **Precedent for Future Sprawl:** Approval invites future applications seeking General Plan amendments to bypass infill expectations.

32-6 Cont.

LU-4-1 – Ensure zoning remains consistent with the General Plan

Amending the General Plan to enable one private development undermines its integrity. Zoning is a reflection of long-term public input and shared values, not developer convenience. Changing it here invites future revisions that weaken the City's planning framework.

RC-1-1 – Preserve creek corridors and natural features

32-7

The project places high-density housing directly along a creek corridor, increasing impervious surfaces and fragmenting habitat. The General Plan prohibits encroachment on these protected areas. Increased flood flow velocity, drainage disruption, and environmental degradation are inevitable if clustering proceeds at this scale.

C-1-1 and C-3-1 – Protect rural road character and match capacity

32-8

Bradshaw and Sheldon Roads are narrow, unlit rural arterials not built for urban traffic volumes. The EIR fails to explain how over 1,200 daily vehicle trips will be accommodated without road widening, curbs, gutters, or lighting—features inconsistent with the area's rural designation.

Key Questions for Response in the Final EIR

32-9

General Plan & Policy Conflict

1. What analysis demonstrates the financial infeasibility of 2-acre rural lots, which comply with current General Plan and Rural Area Community Plan policies?

32-10 2. How does this project align with Policy LU-7-1 (Rural Area Protection) and RA-1 through RA-2 in the Rural Area Community Plan?

32-11 3. Why is a General Plan Amendment being pursued solely for this parcel, and how does that reconcile with LU-4-1?

32-12 4. If a Statement of Overriding Considerations is proposed, what specific public benefit outweighs the eight significant, unavoidable impacts listed in the Draft EIR?

32-13 5. How does this project comply with LU-3-1 when it introduces 10 units per acre into an area surrounded by 2-acre parcels?

Leapfrog Development & Infrastructure Impacts

32-14

1. What criteria classify this project as infill under LU-2-1 despite being disconnected from other urban development?
2. What precedent is set by extending an 18-inch sewer line into the rural area, and how will surrounding parcel rezonings be avoided?
3. What mechanisms will prevent future parcel splits or up-zoning once the project is entitled?
4. How will long-term infrastructure costs be handled if no other nearby development occurs?

Environmental Integrity, Drainage & Flooding

32-15

1. What hydrologic modeling confirms that this project will not increase flood risk or alter drainage patterns?

32-16 2. How does clustering dense housing along a creek comply with RC-1-1?

32-17 3. How will runoff, erosion, and drainage velocity be managed to protect the creek corridor?

32-18 4. What impact will nighttime lighting and urban activity have on riparian habitat?

Traffic & Rural Road Character

32-19

1. How will rural road character be preserved under C-1-1 and C-3-1 given projected traffic increases?
2. What mitigations are proposed to preserve the rural nature of Bradshaw and Sheldon Roads?

Letter 32 Cont.

32-20 3. Has pedestrian, cyclist, and farm equipment safety been adequately addressed?

32-21 4. If urban road features are introduced, how is that consistent with preserving rural road character?

Public Services, Governance & Cost Shifting

32-22 1. Has the City analyzed the impact of annexation into the Cosumnes Community Services District (CSD), and will existing ratepayers bear any financial burden?

32-23 2. What agreements have been made with CSD regarding park, fire, and police services for this development?

32-24 3. Who bears the long-term cost burden if no adjacent development follows?

Alternatives Analysis & CEQA Process

32-25 1. Why was 10 units per acre selected as the "environmentally superior" alternative despite increasing runoff, traffic, and light pollution?

32-26 2. Was a 2-acre lot alternative fully considered, and if not, why was it excluded from analysis?

32-27 3. Were other infill sites evaluated as alternatives?

32-28 4. Does the No Project Alternative assume the site remains in its current rural/agricultural form?

Final Request

32-29 Please include this letter in the official CEQA record for the Summer Villas SPA Project. I respectfully request that all questions above be formally addressed in the Final EIR and that staff evaluate whether any version of this project can remain consistent with the adopted Elk Grove General Plan without undermining its rural preservation policies.

Sincerely,
Matt Arnold
8641 Mackey Road
Elk Grove, CA 95624
Phone: 209-221-0504
Email: arnold.matthew@yahoo.com
Date: November 19, 2025

By sending us an email (electronic mail message) or filling out a web form, you are sending us personal information (i.e. your name, address, email address or other information). We store this information in order to respond to or process your request or otherwise resolve the subject matter of your submission.

Certain information that you provide us is subject to disclosure under the California Public Records Act or other legal requirements. This means that if it is specifically requested by a member of the public, we are required to provide the information to the person requesting it. We may share personally identifying information with other City of Elk Grove departments or agencies in order to respond to your request. In some circumstances we also may be required by law to disclose information in accordance with the California Public Records Act or other legal requirements.

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LETTER 32: MATTHEW ARNOLD

Response to Comment 32-1
The comment is an introduction statement.

Response to Comment 32-2
Please see Response to Comment 30-3.

It should be noted that General Plan Policy LU-3-1 is different than the citation provided by the commenter. The text of Policy LU-3-1 included in the most recently amended General Plan is as follows:

> Ensure that future development in the Study Areas is consistent with the City's Vision and Supporting Principles by implementing the Study Area organizing principles provided herein.

Response to Comment 32-3
Please see Responses to Comments 5-29, 30-3 and 30-11.

Response to Comment 32-4
Please see Master Response 1 and Response to Comment 32-2.

Response to Comment 32-5
Please see Responses to Comments 5-29, 30-3 and 30-11.

Response to Comment 32-6
Please see Master Response 1 and Responses to Comments 5-29, 30-3 and 30-11. The comment has been noted for the record and will be forwarded to the decision-makers for their consideration of the Project.

It should be noted that General Plan Policies LU-2-1, LU-3-3, LU-3-5, LU-4-1, INF-1-6, INF-1-8 are different than the citations provided by the commenter.

Response to Comment 32-7
Please see Master Response 1. A discussion of potential impacts related to the Laguna Creek corridor is included under Impact 4.3-10 in Chapter 4.3, Biological Resources, of the Draft EIR. In addition, Chapter 4.7, Hydrology and Water Quality, of the Draft EIR includes a detailed analysis on the Project's potential impacts related to water quality of Laguna Creek, drainage patterns, and flood flows. All such potential impacts were determined to be less than significant with implementation of mitigation. Furthermore, the Project would not include high-density housing directly along the creek corridor. The proposed 20.3-acre Laguna Creek Open Space area would allow for the preservation of the Laguna Creek corridor and the protection of sensitive on-site wildlife habitat. The open space area would also provide for the containment of the 100-year floodplain. As such, with the inclusion of the Laguna Creek Open Space area, all future on-site development is anticipated to occur outside of the 100-year floodplain limits.

It should be noted that General Plan Policy RC-1-1 is different than the citation provided by the commenter. General Plan Policy RC-1-1 is related to establishing and maintaining a sufficient

area for business and job locations, including office and industrial, and, therefore, would not be applicable to the Project.

Response to Comment 32-8

Please see Master Response 2 and Response to Comment 12-11.

It should be noted that General Plan Policies C-1-1 and C-1-2 do not exist. It is unclear to which specific adopted General Plan policies the commenter is referring.

Response to Comment 32-9

Please see Master Response 1.

Response to Comment 32-10

Please see Response to Comment 32-2.

Response to Comment 32-11

The Project applicant has the right to apply for and pursue any General Plan/Rural Area Community Plan Amendment for their property at their own risk and expense. The Planning Commission makes a recommendation to the City Council, and the City Council is the government body with the authority to approve or disapprove the request.

Response to Comment 32-12

As discussed in Chapter 1, Introduction and List of Commenters, of this Final EIR, pursuant to CEQA Guidelines, Section 15093(b), when a Lead Agency approves a project that would result in significant unavoidable impacts, the agency must state in writing the reasons supporting the action (Statement of Overriding Considerations). The Statement of Overriding Considerations shall be supported by substantial evidence, and must be adopted if the Project is approved. The Statement of Overriding Considerations will be prepared by City staff and provided to the Planning Commission and City Council for their use in determining if the Project should be approved. The Statement of Overriding Considerations will be available to the public at that time and will be included in the Staff Report and/or agendas for the applicable hearings. The public benefits of the Project will be described therein.

Response to Comment 32-13

Please see Response to Comment 32-2.

Response to Comment 32-14

Please see Responses to Comments 5-29, 30-3 and 30-11. As discussed therein, the Project would not directly result in any other future development within the Rural Area. The Project applicant would be required to fund all necessary infrastructure improvements required to serve the Project. The Project applicant is not responsible for funding any future off-site infrastructure associated with separate development proposals by others. Furthermore, the Project is not classified as infill development.

Response to Comment 32-15

As discussed in Chapter 4.7, Hydrology and Water Quality, of the Draft EIR, final sizing and locations of storm drainage improvements have not been determined at this time. As such, the Project would be subject to Mitigation Measure 4.7-4, which requires submittal of a design-level

drainage report for review by the City of Elk Grove Community Development Department. The drainage report shall include written text addressing existing conditions; watershed maps; changes in flows and patterns affected by the proposed off- and on-site improvements; and all appropriate calculations, including sizing and location. The report shall include an evaluation of the drainage system design in accordance with all applicable design parameters and requirements set forth by the City of Elk Grove, including, but not limited to, the inclusion of appropriate stormwater quality and LID features; conveyance and attenuation infrastructure sufficient to ensure post-project peak flows are equal to or less than pre-project peak flows; and the ability to accommodate post-development flows (inclusive of off-site flows) in the 100-year, 24-hour storm event, unless a different design storm is specified by the City. Design-level recommendations provided in the drainage report shall be included in the improvement plans prior to the review and approval by the City of Elk Grove Community Development Department.

Response to Comment 32-16

Please see Response to Comment 32-7.

Response to Comment 32-17

Please see Response to Comment 32-15. Furthermore, the Project would be subject to Mitigation Measures 4.7-2(a) and 4.7-2(b), which require submittal of a detailed BMP and water quality maintenance plan to the City Community Development Department for review and approval, as well as a maintenance covenant to ensure the long-term maintenance of stormwater quality measures.

Response to Comment 32-18

A discussion of potential impacts related to the Laguna Creek corridor and associated riparian habitat is included in Chapter 4.3, Biological Resources, of the Draft EIR. Please also see Response to Comment 32-15 related to water quality and hydrology impacts on Laguna Creek associated with the proposed development. While impacts related to nighttime lighting on riparian habitat specifically is not a CEQA consideration, as discussed under Impact 4.1-3 in Chapter 4.1, Aesthetics, of the Draft EIR, the Project would be subject to applicable City standards and policies intended to reduce impacts related to lighting and glare. For example, EGMC Chapter 23.56 and the subsections included therein address standards for lighting as part of new development, including residential lighting. The EGMC Section 23.56.040 requires that lighting is constructed with shielding to reduce glare such that the source is not visible from within any adjoining residence. The chapter also establishes, for non-residential areas, required levels of illumination for parking lots, driveways, pedestrian walkways, and other areas of new development, and requires limitations on light trespassing onto abutting properties. In addition, the City's Design Guidelines require that exterior building and site lighting be designed such that light is contained within the site and that a light source is shielded downward from direct off-site viewing. Furthermore, future development applications within the Summer Villas SPA would be subject to the standards for lighting established by the Summer Villas SPA document. Pursuant to EGMC Section 23.16.080, all future development would be subject to Design Review approval.

Response to Comment 32-19

Please see Master Response 1, Master Response 2, and Response to Comment 12-11. It should be noted that General Plan Policies C-1-1 and C-3-1 do not exist. It is unclear to which specific adopted General Plan policies the commenter is referring.

Response to Comment 32-20
Impacts related to bicycle and pedestrian infrastructure, as well as incompatible uses, are discussed under Impacts 4.11-2 and 4.11-5, respectively, in Chapter 4.11, Transportation, of the Draft EIR.

Response to Comment 32-21
Please see Responses to Comments 30-3.

Response to Comment 32-22
Please see Master Response 1 related to financial impacts. As discussed in Chapter 4.10, Public Services and Utilities, of the Draft EIR, although implementation of the Project would increase the number of structures protected by local fire protection services, CCSD has confirmed implementation of required fire protection measures and payment of required fees would ensure the Project's potential impacts on fire protection services would be less than significant. In addition, open space and recreation facility credit determination shall be made in the joint discretion of the City and CCSD, and shall be subtracted from required park land dedication or fees, or both, and the Project would not be anticipated to substantially increase demand on existing or future parks or recreational facilities in the surrounding area.

Response to Comment 32-23
Please see Master Response 1.

Response to Comment 32-24
Please see Master Response 1.

Response to Comment 32-25
Please see Master Response 3. Furthermore, the Draft EIR did not conclude that the Aquatic Resources Avoidance Alternative would result in increased impacts related to stormwater runoff or light pollution. Please also see Master Response 2 related to traffic.

Response to Comment 32-26
Chapter 7, Alternatives Analysis, of the Draft EIR considered and included a full analysis of a No Project (Buildout Pursuant to General Plan) Alternative.

Response to Comment 32-27
Please see Master Response 3. As discussed on page 7-5 in Chapter 7, Alternatives Analysis, of the Draft EIR, the City considered an Off-Site Alternative, but the alternative was dismissed from detailed analysis for reasons included therein.

Response to Comment 32-28
As discussed in Chapter 7, Alternatives Analysis, of the Draft EIR, the No Project (No Build) Alternative assumes that the current conditions of the site would remain, and the site or off-site improvements would not be developed.

Response to Comment 32-29
The comment is a conclusion statement.

Letter 33

You don't often get email from melisa.robison@gmail.com. Learn why this is important
[EXTERNAL EMAIL]

--------- Forwarded message ---------
From: **Melisa Robison** <melisa.robison@gmail.com>
Date: Sat, Nov 1, 2025 at 3:34 PM
Subject: Summer Villas at Sheldon
To: <kkillingsowrth@elkgrove.gov>

33-1 Regarding the proposed Summer Villas at Sheldon.
The city has long maintained that Elk Grove would keep that area rural and any housing would be on larger lots to maintain the rural character. This proposal would change all of that. More traffic, more light pollution, changing the rural character of the area. It is incompatible with the area. Bradshaw Rd and Sheldon Rd are already carrying more cars that they can safely and efficiently manage. Additionally, the local schools are already at capacity and physically cannot enroll more students.
The city should deny this project and keep the eastern part of the city rural.
Melisa Robison
Resident of Wilton, CA
Teacher at Pleasant Grove High School, Bond Rd.

LETTER 33: MELISA ROBISON

Response to Comment 33-1

Please see Master Response 1, Master Response 2, and Response to Comment 32-2. In addition, a discussion related to potential impacts on school facilities can be found in Impact 4.10-3 within Chapter 4.10, Public Services and Utilities, of the Draft EIR.

Letter 34

[EXTERNAL EMAIL]

To the Elk Grove Planning Commission and City Council,

I am writing to strongly oppose the proposed high-density development at the southeast corner of Waterman and Sheldon Roads. This project, which may include as many as 499 units, is wholly incompatible with the rural character and community values of the Sheldon area.

I have been a resident of this community for 40 years. When Elk Grove transitioned from a rural farming community to a city, residents were promised that growth would be guided by intelligent planning — preserving open space, maintaining our small-town charm, and protecting the rural quality of life that drew so many here. Unfortunately, that promise has not been upheld. Over the years, we have seen rapid and poorly managed development bring increased traffic congestion, loss of farmland and open space, and a proliferation of high-density housing and strip malls. The city's original vision has been overshadowed by short-term profit and high-density expansion.

34-1 The Sheldon area remains one of the last parts of Elk Grove that still reflects our community's rural roots — with open land, agricultural activity, and larger residential lots. Approving a dense housing project of this scale at Waterman and Sheldon would irreversibly alter that balance. It would bring more traffic to already congested roads, increase light and noise pollution, and permanently erase the rural landscape that distinguishes this area from the rest of the city.

This proposal contradicts the city's longstanding commitment to maintain the rural integrity of eastern Elk Grove. It represents yet another broken promise to residents who have repeatedly voiced their desire to keep our rural spaces. Elk Grove's growth should not come at the cost of the very qualities that make it special.

I urge the Planning Commission and City Council to reject this project and honor the city's commitments to its citizens. Please preserve what remains of our rural heritage and protect the Sheldon area from incompatible urban expansion.

Sincerely,
Melissa Silva

LETTER 34: MELISSA SILVA

Response to Comment 34-1

Please see Master Response 1.

Letter 35

CEQA Comment Letter - Summer Villas Draft EIR

Submitted by:
Melvin Scott
8655 Rubia Dr
Elk Grove, CA 95624

Date: *11/23/2025*
Submitted to:
Kyra Killingsworth kkillingsworth@elkgrove.gov
Planning Department – Project Manager
Subject: **Comments on the Summer Villas Draft Environmental Impact Report**
Project: **Summer Villas PLNG23-007 SCH#20240804070**
Document: **Draft Environmental Impact Report**

Dear Planning Commission,

35-1

The residents of this area chose Elk Grove's rural lifestyle for its open space, low-density character, and safe roads. Approving high-density development like Summer Villas would fundamentally alter this community, placing undue pressure on infrastructure, wildlife, and the natural environment.

35-2

Table 7-2 of the Summer Villas Draft EIR demonstrates that the proposed project would result in multiple **significant and unavoidable environmental impacts**, including degradation of visual character, increased light and glare, unplanned population growth, noise, and greenhouse gas emissions. In contrast, the **No Project (Buildout Pursuant to the approved General Plan) Alternative** shows **none or fewer impacts** across nearly all categories.

Key Points:

1. **Preservation of Rural Character:** The project would substantially degrade the area's visual character and introduce new light and glare (4.1-1, 4.1-3, 4.1-4, 4.1-5). The approved General Plan and Rural Road standards protect the rural landscape and public views.
2. **Protection of Biological and Cultural Resources:** Impacts to special-status species, wetlands, oak woodlands, and tribal/cultural resources are fewer or similar under the General Plan alternative (4.3, 4.4), showing that existing zoning better safeguards natural and cultural resources.
3. **Hydrology and Water Quality:** Current Rural Road and development standards minimize runoff, flooding, and water quality impacts (4.7-1, 4.7-2, 4.7-4, 4.7-5), whereas the project would increase impervious surfaces and flood risk.
4. **Noise, Traffic, and Infrastructure:** The project would generate significant temporary noise and strain infrastructure (4.8-3, 4.9-1). The General Plan alternative maintains the low-density rural lifestyle while avoiding these impacts.

Letter 35 Cont.

35-2 Cont.

5. **Cumulative Environmental Benefits:** Across all categories, the No-Build or General Plan alternative produces **fewer cumulative impacts**, demonstrating that the approved General Plan balances growth with environmental protection.

35-3

Conclusion:
The Draft EIR makes clear that maintaining the **approved Elk Grove General Plan and Rural Road standards** is the environmentally responsible approach. High-density development like Summer Villas would significantly and unavoidably harm aesthetics, ecology, water resources, and the rural character of the area. I urge the Planning Commission to recommend **retaining the current General Plan and Rural Road standards**.

Respectfully,
Melvin Scott

LETTER 35: MELVIN SCOTT

Response to Comment 35-1
Please see Master Response 1.

Response to Comment 35-2
Please see Master Response 1.

Response to Comment 35-3
Please see Master Response 1.

Letter 36

-----Original Message-----
From: MIchelle Pennington-Phillips <moshell72@yahoo.com>
Sent: Friday, October 31, 2025 7:52 PM
To: Kyra Killingsworth <kkillingsworth@elkgrove.gov>
Subject: 499 unit

You don't often get email from moshell72@yahoo.com. Learn why this is important <https://urldefense.proofpoint.com/v2/url?u=https-3A__aka.ms_LearnAboutSenderIdentification&d=DwIGaQ&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_CdpgnVfiiMM&r=Gwn-

[EXTERNAL EMAIL]

36-1 I'm reaching out in regards to this proposal ON WATERMAN AND SHELDON this should be stopped immediately there is already too much traffic on sheldon with the development on power inn and sheldon, now more units. Keep East Elk Grove Rural, BUILD SCHOOLS NOT APARTMENTS.
Thanks a concerned neighbor of sheldon Highlands

LETTER 36: MICHELLE PENNINGTON-PHILLIPS

Response to Comment 36-1

Please see Master Response 1.

Letter 37

SUMMER VILLAS SPECIAL PLANNING AREA
DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)
COMMENT MEETING

COMMENT FORM

To document the author of comments received, please provide the following information. Thank you.

Name: Nancy Knott

Address: 8891 Saint Anthony Court

Organization (if applicable): _____

Please provide us with your written comments on the Draft EIR by **5:00 PM, November 24, 2025.**

37-1 1. Has the Walkability of Sheldon Road been considered. There are no sidewalks ~~for the~~ or Crosswalks from Elk Grove Florin to Waterman. When this was truly rural the side walks weren't needed. Now with extra traffic we need secure walkways.

37-2 2. Horse Traffic is an issue too when trying to cross Sheldon. Since we have horse trails in this area, has this extra traffic been considered for horse back riding.

Send comments to:

Kyra Killingsworth, Senior Planner
City of Elk Grove Community Development Department
Planning Division
8401 Laguna Palms Way
Elk Grove, CA 95758
kkillingsworth@elkgrove.gov

*Figure not OCR Compatible.

LETTER 37: NANCY KNOTT

Response to Comment 37-1

A discussion related to impacts on pedestrian facilities can be found on pages 4.11-20 through 4.11-22 of Chapter 4.11, Transportation, of the Draft EIR. As discussed therein, implementation of Mitigation Measure 4.11-2 would require the future Tentative Map(s) for the Project to include the construction of a Class I multi-use path along the Project frontage on Sheldon Road between Waterman Road and Bradshaw Road. In addition, Mitigation Measure 4.11-2 requires the Project to contribute to the planned development of the Class I multi-use path along Waterman Road between Bond Road and Calvine Road and along Sheldon Road between Elk Grove Florin and Waterman Road. Implementation of Mitigation Measure 4.11-2 would reduce the potentially significant impact to a program, plan, ordinance, or policy addressing the circulation system, including pedestrian and bicycle facilities during operations to a less-than-significant level.

Response to Comment 37-2

Please see Master Response 1. In addition, a discussion regarding issues related to traffic safety hazards can be found in Chapter 4.11, Transportation, of the Draft EIR.

Furthermore, potential impacts related to existing transportation facilities, including considerations related to equestrian users, were acknowledged on page 4.11-21 of the Draft EIR as follows:

> Thus, given the number of residents that would be generated as part of the Project and the lack of any planned off-site bicycle or pedestrian facilities, the Project would conflict with General Plan Policy MOB-3-1, which requires a balanced transportation system that ensures the safety and mobility of all users (including pedestrians, cyclists, and equestrian users, as appropriate) […].

Therefore, the Project's increase in traffic and equestrian users were considered within the Draft EIR.

Letter 38

38-1 Hi Kyra, it was a pleasure to meet you at the community meeting last week, Nov 13. Here are some concerns I have regarding this project.

38-2 1. Water supply. Where is all the water going to come from? 499 new units with 2 to 3 maybe 4 people in each unit, plus the landscaping, walking trails, parks, and swimming pools at the clubhouses. Will there be a new deep well dug for this? Or will it tie into an existing main water line? If so, where is this existing line located? If it will be a new well, that will have a direct impact on all of the wells in the Greater Sheldon Estates area. We cannot allow another large deep well into our aquifer without a detailed study on how it will affect existing users. When our water supply is exhausted, or when the water table level falls too low, we may not be able to get any water at all.

38-3 2. Sewer. Where is the existing sewer line that you plan on tapping into? Will it require any new sewer lines to be installed on Sheldon Rd? How will this construction be accomplished? Also, if there is a new sewer line on Sheldon Rd, will that have any impact on existing homeowners? Will the city require me to utilize this line if and when I need to replace my septic system?

38-4 3. Traffic. Sheldon Rd and Waterman Rd are simply not designed for the amount of traffic this project will generate and add to existing traffic. These roads are country roads. There are no sidewalks, shoulders, curbs, street lights, or traffic lights. When i run along Waterman Rd, there are always new tire marks in the dirt along the road, or somebody's front fence was taken out, or there are new skid marks in the round-about. City drivers just dont have the respect and patience to navigate country roads safely. Also, it is already difficult to turn onto Sheldon coming out of any of the side streets between Waterman and Elk-Grove Florin. This will make it much worse, especially during commute hours. Also, the 3 new entry roads into the Summer Villas off of Sheldon east of Waterman, they are going to be right in the way of traffic exiting the round-about. There will be much congestion right in that area, with cars exiting the round-about, westbound

Letter 38 Cont.

cars on Sheldon making a left turn into the Summer Villas, and cars exiting the Summer Villas either trying to turn left or right, and just normal traffic on Sheldon, again especially during commute hours.

Additionally, there are going to be 2 new entry streets into the new homes just on the North side of Sheldon directly across from the Summer Villas. There will be a total of 5 streets merging onto a 2-lane Sheldon Rd just past the round-about all in the same vicinity.

38-4 Cont.

This plan violates the existing zoning of AR2 that we fought for and the city agreed to. The developer knew what the zoning was when he bought the property. He needs to abide by these zoning requirements and keep the heart of Old Elk Grove rural.

The developer tries to sell us on the fact that there will be new parks, walking trails, natural areas, swimming pools and whatever else, but this will be a GATED COMMUNITY. Unless you are living in this community, you will not have access to any of these ammenities.

Thank you for taking the time reading and addressing my concerns.

paul giordano
8648 Rubia Dr

LETTER 38: PAUL GIORDANO

Response to Comment 38-1
The comment is an introductory statement.

Response to Comment 38-2
Please see Response to Comment 9-2.

Response to Comment 38-3
Please see Responses to Comments 9-3, 9-4, and 9-5.

Response to Comment 38-4
Please see Master Response 1 and 2.

In addition, transportation impact analyses can be found in Chapter 4.11, Transportation, of the Draft EIR.

Letter 39

From: Paul Johanneson <paul.johanneson@yahoo.com>
Sent: Friday, October 31, 2025 2:53 PM
To: Kyra Killingsworth <kkillingsworth@elkgrove.gov>
Subject: Summer Villas at Sheldon Road Public Comment

You don't often get email from paul.johanneson@yahoo.com. Learn why this is important
[EXTERNAL EMAIL]

Hi

39-1 I have a concern about the project Summer Villas at Sheldon Road.

LETTER 39: PAUL JOHANNESON

Response to Comment 39-1

Please see Master Response 1.

Letter 40

Rachell Owen-Reinwald
8969 Covey Ct
Elk Grove, CA 95624

November 14, 2025

City of Elk Grove
Attn: Kyra Killingsworth, Senior Planner
8401 Laguna Palms Way
Elk Grove, CA 95758

Email: kkillingsworth@elkgrove.gov

Re: Comments on the Draft Environmental Impact Report – Summer Villas Special Planning Area (PLNG23-007)

To Whom It May Concern:

40-1 I am submitting the following comments on the Draft Environmental Impact Report (DEIR) for the proposed Summer Villas Special Planning Area (SPA). These comments address areas where the DEIR may not fully meet requirements under the California Environmental Quality Act (CEQA) or where the project appears inconsistent with adopted City of Elk Grove policies and established planning frameworks.

1. Consistency with General Plan Rural Area Policies

40-2 The project site is currently designated as part of the Rural Elk Grove Special Planning Area, which establishes minimum lot sizes of two acres and limits the extension of urban services. The **proposed** SPA introduces urban-density residential development with reliance on City water, sewer, and roadway infrastructure. This appears inconsistent with General Plan policies RA-1-1, RA-1-2, RA-2-1, RA-2-4, and RA-3, all of which restrict or prohibit urban development and infrastructure extensions into the Rural Area.

Because General Plan policies guide land-use decisions, any change that conflicts with these policies would typically require a separate, publicly reviewed General Plan amendment.

40-3 **2. Infrastructure Expansion and Growth-Inducing Effects**

Letter 40 Cont.

40-3 Cont.

The DEIR and technical appendices identify the following infrastructure needs:

- A new sewer lift station
- Approximately 6,500 linear feet of off-site sewer force main
- An 8,000-foot water transmission main extension
- Creek crossings associated with both utilities

The Sacramento Area Sewer District (SASD) and Sacramento Regional County Sanitation District (SRCSD) master plans historically exclude the Rural Area from sewer service expansion. Extending these utilities into a non-urban area may constitute a growth-inducing impact under CEQA Guidelines §15126.2(d), particularly if the new infrastructure has the capacity to serve properties beyond the project site. Such impacts require detailed evaluation.

3. Laguna Creek Corridor – Biological and Hydrological Considerations

40-4

The appendices reference potential modifications near Laguna Creek, including crossings and outfalls. The DEIR does not quantify the existing corridor width, potential reductions in habitat connectivity, or potential cumulative effects from lighting, noise, and increased human activity.

The project area overlaps land governed by the South Sacramento Habitat Conservation Plan (SSHCP), which requires evaluation of impacts to species movement and corridor functionality. Additional analysis may be needed to demonstrate compliance with SSHCP performance standards.

4. Hazardous Materials – Data Gaps Related to Soil Conditions

Appendix H identifies multiple recognized environmental conditions (RECs), including:

40-5

- Historic dairy/wastewater operations
- Former fuel or chemical storage
- Unverified fill materials
- Rusted drums observed onsite

The peer-review document recommends laboratory confirmation sampling for soil and fill materials. The DEIR relies primarily on field screening using photoionization detector (PID) readings without laboratory analysis, which may represent a data gap in the hazards assessment under CEQA §15151.

5. Transportation – Vehicle Miles Traveled (VMT)

40-6

Letter 40 Cont.

40-6 Cont.

The DEIR identifies a significant and unavoidable vehicle miles traveled (VMT) impact under CEQA Guidelines §15064.3. The project site is located in a low-transit, auto-dependent area, which is consistent with higher per-capita VMT.

CEQA requires evaluation of feasible alternatives capable of reducing VMT. An alternative that retains the existing Rural Elk Grove SPA designation or shifts similar housing to infill areas would typically produce lower per-capita VMT and may warrant further comparison.

6. Visual Resources and Tree Removal

40-7

Project plans indicate removal of native trees, including Valley Oaks and Black Walnuts, which are identified as Trees of Local Importance under City standards. The DEIR concludes that this loss contributes to a significant and unavoidable visual impact.

Given this classification, further review of feasible avoidance measures, revised site planning, or increased replacement ratios may be warranted to ensure consistency with City tree and visual resource policies.

7. Requested Actions

40-8

Based on the information above, I respectfully request that the City consider the following actions:

1. Evaluate whether the **No Project Alternative**, which retains the existing Rural Elk Grove SPA, constitutes the environmentally superior alternative under CEQA.

40-9

2. If the project proceeds, analyze an alternative that maintains **minimum two-acre lots**, rural infrastructure patterns, and on-site well and septic systems.

40-10

3. Conduct **laboratory soil sampling** and prepare a **Soil Management Plan** before certification of the EIR.

40-11

4. Defer zoning changes until a separate **General Plan amendment** addressing Rural Area policies is publicly considered.

40-12

5. Provide additional analysis of **Laguna Creek corridor functions** and demonstrate consistency with SSHCP requirements.

Conclusion

40-13

The DEIR identifies several potentially significant impacts and areas where the analysis may require additional information to meet CEQA standards. The project also appears inconsistent with established General Plan Rural Area policies unless those policies are amended through a separate public process.

Letter 40 Cont.

40-13 Cont.

Thank you for your attention to these comments.

Sincerely,

Rachell Owen-Reinwald

rachellowenreinwald@gmail.com

LETTER 40: RACHELL OWEN-REINWALD

Response to Comment 40-1
The comment is introductory to the remainder of the comment letter.

Response to Comment 40-2
The Project is pursuing a General Plan/Rural Area Community Plan Amendment to remove the site from the Rural Area Community Plan and change the General Plan land use designation of the site from Rural Residential (RR) to LDR and Parks and Open Space (P/OS). Therefore, following approval of the Rural Area Community Plan Amendment removing the site from the Rural Area Community Plan, the Project would not conflict with the policies noted by the commenter.

Response to Comment 40-3
A detailed evaluation of growth-inducing impacts related to the Project and off-site improvements is included in Chapter 6, Statutorily Required Sections, of the Draft EIR. Please also see Response to Comment 5-29.

Response to Comment 40-4
A detailed discussion of impacts related to the Laguna Creek corridor is included in Chapter 4.3, Biological Resources, of the Draft EIR. A discussion related to Project consistency with South Sacramento Habitat Conservation Plan (SSHCP) requirements is included in Chapter 5, Effects Not Found to be Significant, of the Draft EIR. As discussed therein, the City of Elk Grove does not participate in the SSHCP and the site is not within the SSHCP area. Cumulative impacts related to lighting and noise are addressed in Chapter 4.1, Aesthetics, and 4.9, Noise, respectively, of the Draft EIR.

Response to Comment 40-5
Chapter 4.6, Hazards and Hazardous Materials, of the Draft EIR included Mitigation Measures 4.6-2(a), 4.6-2(b), and 4.6-2(c), which require laboratory sampling for soil materials in accordance with the recommendations of the peer review of the Phase I ESA and associated Addendum.

Response to Comment 40-6
Please see Response to Comment 30-15.

Response to Comment 40-7
The Draft EIR did not conclude that removal of trees would result in a significant and unavoidable visual impact. In addition, the Project would be subject to Mitigation Measure 4.3-12 related to tree removal. As required therein, prior to ground-disturbing activities and work within the critical root zone, removal, topping, or relocation of any tree of local importance, a Tree Removal Permit shall be obtained from the City of Elk Grove, Planning Division, and the Project applicant shall comply with all of the conditions of the permit.

Response to Comment 40-8
Please see Master Response 3.

Response to Comment 40-9

Chapter 7, Alternatives Analysis, of the Draft EIR included an analysis of a No Project (Buildout Pursuant to General Plan) Alternative, which included the recommendations noted by the commenter.

Response to Comment 40-10

Please see Response to Comment 40-5.

Response to Comment 40-11

Please see Response to Comment 40-2.

Response to Comment 40-12

Please see Response to Comment 40-4.

Response to Comment 40-13

The comment is a conclusion statement. Please also see Response to Comment 40-2.

Letter 41

[EXTERNAL EMAIL]

Submitted on Sun, 11/02/2025 - 11:24

Submitted by: Anonymous

Submitted values are:

Name
Ramona Johanneson

Email
rjohan@live.com

Phone
9169196687

Comments/Questions
I am opposed to this project because of how bad the traffic is on Sheldon already. I live on Sleepy Hollow Lane very close to Sheldon. I drive Sheldon Road daily each direction—east towards Grantline and west towards Elk Grove Florin. At each stoplight there can easily be 15 cars waiting and this is not just at commute times. It's dangerous because not everyone is cordial at the stop signs-they are in a hurry and often two cars go at the same time. The roundabouts are not well understood by drivers and it's risky traveling through them. I've literally had about 50 "near misses" in the last 30 days. I've seen probably 15 reared accidents this summer and last year witnessed 3 or 4 cars getting hit broadside at the roundabouts. My daughter-in-law with my 1 year old granddaughter in the car was rear ended at Sheldon and Bader last year. My neighbors daughter was broadsided at the same stop sign in May and she was injured—not all cars stop…they run this stop sign a lot and I don't know why. I've been run into the ditch because of inattentive drivers texting on the busy Sheldon two lane road and they were well over the center line - I would have been hit head on if I didn't drive into the ditch. I paid $2,900 to fix my car the first time and $900 the second time from damage caused—I know getting hit head on by a vehicle traveling 40-50 mph could have been deadly. When I bought my home on Sleepy Hollow 7 years ago I felt safe leaving my house. Right now traveling either direction on Sheldon is unsafe. I feel terrible for anyone living on Sheldon Road between Grantline and Elk Grove Florin because it's nearly impossible for these homeowners to exit their driveway onto Sheldon Road. There are so many cars and I can imagine how long they wait each time they try to leave their house. When they do leave it's risky because of how fast vehicles are traveling. Please don't approve this project unless Sheldon Road is made into 4?lanes. It's so dangerous now and with added cars will be a lot more dangerous… thank you.

41-1

LETTER 41: RAMONA JOHANNESON (1 OF 2)

Response to Comment 41-1

Please see Master Responses 1 and 2.

Letter 42

[EXTERNAL EMAIL]

Submitted on Wed, 11/05/2025 - 07:22

Submitted by: Anonymous

Submitted values are:

Name
Ramona Johanneson

Email
rjjohan@live.com

Phone
9169196687

Comments/Questions
I am opposed to this project because of how bad the traffic is on Sheldon already.

I live on Sleepy Hollow Lane very close to Sheldon. I drive Sheldon Road daily each direction—east towards Grantline and west towards Elk Grove Florin. At each stoplight there can easily be 15 cars waiting and this is not just at commute times. It's dangerous because not everyone is cordial at the stop signs-they are in a hurry and often two cars go at the same time.

42-1

The roundabouts are not well understood by drivers and it's risky traveling through them. I've literally had about 50 "near misses" in the last 30 days. I've seen probably 15 reared accidents this summer and last year witnessed 3 or 4 cars getting hit broadside at the roundabouts. My daughter-in-law, with my 1 year old granddaughter in the car, was rear ended at Sheldon and Bader last year. My neighbors daughter was broadsided at the same stop sign in May and she was injured—not all cars stop…they run this stop sign a lot and I don't know why.

I've been run into the ditch because of inattentive drivers texting or something else on the busy Sheldon two lane road and they were well over the center line. I would have been hit head on if I didn't drive into the ditch. I paid $2,900 to fix my car the first time and $900 the second time from damage caused. I know getting hit head on by a vehicle traveling 40-50 mph could have been deadly.

When I bought my home on Sleepy Hollow 7 years ago I felt safe leaving my house. Right now traveling either direction on Sheldon is unsafe. I feel terrible for anyone living on Sheldon Road between Grantline and Elk Grove Florin because it's nearly impossible for these homeowners to exit their driveway onto Sheldon Road. There are so many cars and I can only imagine how long they wait each time they try to leave their house. When they do leave it's risky because of how fast vehicles are traveling.

Please don't approve this project unless Sheldon Road is made into 4 lanes with the elimination of the roundabouts. It's so dangerous now and with added cars will be a lot more dangerous.

Thank you.

LETTER 42: RAMONA JOHANNESON (2 OF 2)

Response to Comment 42-1

Please see Response to Comment 41-1.

Letter 43

You don't often get email from docs44@aol.com. Learn why this is important
[EXTERNAL EMAIL]

43-1 Good morning, I would like to provide my input on this project.
I am a life long Elk Grove resident. 62 years. So I have seen the city make dramatic changes. I have lived in the Bradshaw Road area for 23 years. We moved there because of the rural atmosphere. The city has maintained the area east of Waterman near Sheldon would remain rural. This new proposal would change all of that. The project is incompatible with the area. It would stick out like a sore thumb. It would drastically affect the area. More traffic, more light pollution. Changing the rural character of the area. I urge the city, the planning commission and city council to deny this project. Elk Grove has very little rural area left. We should protect it.

Robert "Doc" Souza

By sending us an email (electronic mail message) or filling out a web form, you are sending us personal information (i.e. your name, address, email address or other information). We store this information in order to respond to or process your request or otherwise resolve the subject matter of your submission.

Certain information that you provide us is subject to disclosure under the California Public Records Act or other legal requirements. This means that if it is specifically requested by a member of the public, we are required to provide the information to the person requesting it. We may share personally identifying information with other City of Elk Grove departments or agencies in order to respond to your request. In some circumstances we also may be required by law to disclose information in accordance with the California Public Records Act or other legal requirements.

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LETTER 43: ROBERT "DOC" SOUZA

Response to Comment 43-1

Please see Master Response 1.

Letter 44

You don't often get email from noreply@elkgrove.gov. Learn why this is important
[EXTERNAL EMAIL]

Submitted on Fri, 10/31/2025 - 14:35

Submitted by: Anonymous

Submitted values are:

Name
Ross Ozaki

Email
rossozaki@hotmail.com

Phone
9166611914

Comments/Questions
NO!! You all think building the Round-A- Bout was gonna make traffic flow better, but building something of this density will make EVERYTHING worse.

44-1

Traffic already is bad in the mornings in that area!

I believe your Urban Planners are not "qualified", because everything they "touch" makes it worse. Did they get on-line degrees!!!

LETTER 44: ROSS OZAKI

Response to Comment 44-1

Please see Master Response 1.

Letter 45

RECEIVED
NOV 24 2025
CITY OF ELK GROVE
PLANNING

SUMMER VILLAS SPECIAL PLANNING AREA
DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)
COMMENT MEETING

COMMENT FORM

To document the author of comments received, please provide the following information. Thank you.

Name: Shannon Machovec

Address: 8664 Rubia Dr

Organization (if applicable): GRESHA

Please provide us with your written comments on the Draft EIR by **5:00 PM, November 24, 2025.**

45-1 I would like the planning dept. to concider The impact this will cause to the heritage of the rural areas that need to be preserved. Not only for the native wildlife but also the country folk and ranchers that want that project to remain RURAL! Please Concider what this project will impact is Significant damage to our area. I know Mr Killwanie has alot of money and his hands in a lot of projects. He doesn't live here so it won't effect him except to make him more money. Please its not always about the money. Dont allow the rural area lines change. Stand up for us Please I beg you! Wildlife, ranches, equestrians riding, clean air, fresh water, beautiful scenery, and the heritage of what makes Elk Grove great need you to be on our side. Mr. Killwanie will sell and move on hopfully. Don't ruin our city!

Send comments to:

Kyra Killingsworth, Senior Planner
City of Elk Grove Community Development Department
Planning Division
8401 Laguna Palms Way
Elk Grove, CA 95758
kkillingsworth@elkgrove.gov

*Figure not OCR Compatible.

LETTER 45: SHANNON MACHOVEC

Response to Comment 45-1

Please see Master Response 1.

Letter 46

46-1 While my wife and I don't live in the historically known and well documented "Rural Area" of Elk Grove, we staunchly support those residents who oppose the approval of the Summer Villas SPA; a plan that would substantially alter the General Plan in that specific rural area to allow a rezone from AR-2 to allow 499 age restricted single-residential units onto 71.3 acres of buildable land. Under the current General Plan a maximum of 36 single family residences would be allowable on that parcel. To allow 499 units within this area would be devastating to those who currently live there, to their quality of life, their property values as well as to the character and the history of the land itself.

This EIR has found adequate reasons to deny this project, finding numerous Significant Unavoidable Impacts that are well detailed herein. Each and every individual finding should be sufficient to deny the project. These issues taken cumulatively demand rejection.

46-2 1) Aesthetics: The EIR admits there will be a substantial degradation of the existing visual character or quality of views of the site and its surroundings. A development of 499 housing units in such a small area can easily change the nature of a quiet rural area causing a conflict over land use and increasing the potential for future sprawl and further development in a piecemeal fashion that separates and harms communities. - Should not an option for a buildout deferring to current standards have been considered?

46-3 2) Air Quality / GHG Emissions/Energy: The EIR again admits the project submitted creates unavoidable issues as it relates to air quality and gas emissions. This is largely due to the size and scale of the proposed project. Had the developer offered a plan within the existing General Plan guidelines, many of these issues could be more easily mitigated. 499 housing units equates to over 1,000 vehicles driven on our roads daily; and not on our main thoroughfares, but on our rural roadways, GrantLine Road, Sheldon Road, Waterman Road; roads used more sporadically by locals; two lane roads. These impacts will be cumulative, permanent and unavoidable. The gasses these vehicles emit are devastating to the oxygen we breath, to the health of our crops, our wildlife and the health of our kids. Many who live in the rural area moved there because of the better air quality, the quiet nature, the slower lifestyle. This project is placing the benefits they paid for so many years ago in danger of destruction for the wishes of a developer who knew the restrictions when he bought the property. The rural roads cannot adequately handle increased traffic should this project be approved.

46-4 3) Land Use Planning/Population/Housing: The project "induces substantial unplanned population in an area either directly or indirectly." Again, it seems as if the developer wants a lot from this community while not willing to make any concessions himself. He knew, when he bought this land, it was zoned AR-2. He expects every rural homeowner to bow to his wishes? - CEQA requires assessment of the cumulative effects of a project and how it may affect future projects, i.e. growth inducing affects, create future sprawl, how it affects current land uses, future land uses, current and future development regulations. These issues must be addressed. They seemed to have been ignored in this EIR. The regulations surrounding the "rural area standards" have not been addressed at all. Issues with regard to water access, sewers, street lights, sidewalks, etc need

Letter 46 Cont.

46-4 Cont. to be addressed and resolved. Should this project be approved, how can the city deny another developer with a similar plan. The standard will have been broken. CEQA has also stated that land use projects can lead to future urban sprawl and such issues need to be mitigated by large lot zoning , planned developments to insure compatibility with existing land uses, and protection of natural resources. This seemingly was not considered here?

46-5 4) Transportation: EIR findings seem to be inconsistent with CEQA guidelines 15064.3(b). Please respond.

46-6 5) Public Safety: Currently, CCSD (fire), ambulance and EG police response times fall outside of preferred response times and the response times will further increase due to increased traffic should this project survive. More homes, more people, more people on roads, more crime = longer response times. It's just a fact. None of this was addressed in the EIR. Please respond to potentially expected expanded police/fire/ambulance response times, especially east of the SP RR tracks.

Additional issues not addressed:

46-7 Flooding/water runoff: - Elk Grove is in a valley basin with several creeks running through it. The city and surrounding area (including this particular site) has been known to flood after a particularly heavy rain. It's not that random an occurrence. A new large housing project bordering a creek offers that area a lot less area for water to soak into the ground and creates the likelihood of increased volume and speed of runoff of stormwater runoff potentially overwhelming natural drainage systems while also creating new contamination issues and creating potential property damage issues downstream. I didn't see that adequately addressed in the EIR. It certainly seems to be a pertinent and glaring environmental issue for anyone who watches the news. Please respond.

46-8 Historical Significance of Rural Elk Grove: - While we wouldn't necessarily expect an EIR to address the historical aspects of a plot of land up for development, we nevertheless feel it necessary to acknowledge the historical notoriety to this community. During the Gold Rush, Elk Grove's Rural Area was the site of a stagecoach stop. It was also the agriculture hub for local farmers to buy, sell and trade their goods to others in the community, establishing our community. Citizens moved into the area to raise cattle, and horses; to farm. Some just to raise their families in ranch style homes with open space all around.

46-9 The Summer Villas project threatens the character and sustainability of this rural community. It will increase traffic, add unwanted infrastructure, strain emergency services, bring in city or county water lines and sewer, street lights. These changes will cause irreversible undeniable damage to centuries old established habitats and open spaces. Quality of life issues to hundreds of rural residents who bought their land and homes knowing of these restrictions placed in the area, knowing their investment would be protected by the laws and ordinances of the community are now being assaulted by a single land developer that couldn't care less about their loss of home values his development would cost them.

46-10 In closing: The placement of this project is totally inappropriate at this location. The scale is inappropriate. The developer knew the restrictions on the property when he purchased it. The

Letter 46 Cont.

46-10 Cont.

developer has no plans to build; just to gain approval, gain entitlements and sell to someone else. His plan is to destroy the character of a regionally historic area just to make a dollar. Centuries of local history are at risk.

Regards,
Steve & Kathy Lee

LETTER 46: STEVE AND KATHY LEE

Response to Comment 46-1
Please see Master Response 1.

Response to Comment 46-2
Please see Master Response 1.

A discussion of alternatives to the Project is provided in Chapter 7, Alternatives Analysis, of the Draft EIR, in which a No Project (Buildout Pursuant to General Plan) Alternative analysis was provided.

Response to Comment 46-3
Please see Master Responses 1 and 2. In addition, contrary to the commenter's claim, while GHG emissions were determined to be cumulatively considerable and significant and unavoidable, impacts related to air quality concerns were determined to be less than significant, as found in Chapter 4.2, Air Quality, Greenhouse Gas Emissions, and Energy, of the Draft EIR.

Response to Comment 46-4
A discussion of cumulative impacts related to development of the Project in conjunction with buildout of the Elk Grove General Plan planning area can be found in every technical chapter of the Draft EIR. In addition, more details regarding the cumulative setting can be found in Chapter 6, Statutorily Required Sections, of the Draft EIR. Furthermore, impacts regarding water and sewer facilities can be found in Chapter 4.10, Public Services and Utilities, of the Draft EIR. Issues involving light and glare are discussed in Chapter 4.1, Aesthetics, of the Draft EIR. Additionally, sidewalks are addressed in Chapter 4.11, Transportation, of the Draft EIR, including the construction of a Class I Multi-Use Path along the Project frontage parallel to Waterman Road.

In regard to concerns related to urban sprawl, the Project would require approval of a General Plan/Rural Area Community Plan Amendment and a Rezone to allow for the creation of the Summer Villas SPA. The SPA would adopt site-specific zoning, development standards, and criteria for future development proposals within the site, with which the Project would be required to comply.

Response to Comment 46-5
The commenter claims that the Draft EIR findings are inconsistent with CEQA Guidelines Section 15064.3, subdivision (b), but does not elaborate further. A discussion of the Project's consistency with CEQA Guidelines Section 15064.3, subdivision (b), is provided on pages 4.11-23 through 4.11-29 in Chapter 4.11, Transportation, of the Draft EIR. As stated therein, implementation of Mitigation Measure 4.11-4 would reduce VMT associated with the Project by implementing TDM strategies to reduce external vehicle trips generated by residents of the Project. However, due to uncertainties regarding the ability for the mitigation measures to reduce VMT impacts to less-than-significant levels, VMT impacts of the Project would be considered to remain significant and unavoidable.

Response to Comment 46-6
A discussion of the Project's impact on fire protection and law enforcement services can be found on pages 4.10-19 through 4.10-21 in Chapter 4.10, Public Services and Utilities, of the Draft EIR.

As discussed therein, CCSD has confirmed implementation of required fire protection measures and payment of required fees would ensure the Project's potential impacts on fire protection services would be less than significant. The site is located within the service area of Station 73, which is currently unable to meet the desired response times in the primary response area as established by CCSD policy. However, based on the proximity of the site to Station 73, and the payment of fire impact fees to offset the increased demand for public services, new fire protection service facilities would not be required as a result of the Project. In addition, the EGPD has indicated that new or physically altered law enforcement facilities would not be needed to adequately serve the Project. Therefore, the Draft EIR determined that a less-than-significant impact would occur related to the need for new, or improvements to existing, fire protection and police protection facilities.

Response to Comment 46-7

Please see Responses to Comments 5-22 and 24-20.

In addition, the potential for the Project to result in flooding on- or off-site is analyzed under Impact 4.7-4 in Chapter 4.7, Hydrology and Water Quality, of the Draft EIR. As described therein, the project would incorporate LID controls consistent with the SQDM for the Sacramento region. The proposed LID features would be sufficiently sized to meet the required storage volumes. Thus, project runoff entering Laguna Creek would not exceed the capacity of the on-site systems, and would not result in on-site flooding. However, a culvert across a Laguna Creek tributary currently exists at the Sheldon Road/Bradshaw Road intersection. Should roundabout improvements widen the existing roadway into the existing culvert area, peak runoff flows could increase significantly and result in off-site flooding. Therefore, a final drainage report would be required with the project improvement plans to specify the site's drainage design and address the off-site improvements triggered by Project development. With implementation of Mitigation Measure 4.7-4 in Chapter 4.7, Hydrology and Water Quality, of the Draft EIR, the potential for development of the Project to result in an increase in off- or on-site peak runoff flows relative to existing conditions would be reduced to a less-than-significant level.

Response to Comment 46-8

Please see Response to Comment 5-11.

Response to Comment 46-9

Please see Master Response 1.

Response to Comment 46-10

Please see Master Response 1.

Letter 47

Suzanne Pecci

10212 Equestrian Drive
Elk Grove, Ca 95624
(916)686-6768
slpecci@aol.com

November 24, 2025

City of Elk Grove
Dept. of Planning and Development
8401 Laguna Palms Way
Elk Grove, CA9758
Attn: Kyra Killingsworth

Dear Ms. Killingsworth,

47-1 As a resident of Elk Grove for 50 years, and Community Member in Rural East Elk Grove, residing in the Hop Ranch Estates Subdivision for the past 40 years, I am providing written comments and my opinion on the Summer Villas DEIR as a follow-up to my public comments made at the Community Meeting on November 12, 2025. There are major Project environmental impacts that were not studied due to the decision to exclude the Summer Villas Construction Plan from the Summer Villas Project DEIR.

47-2 The Summer Villas Draft Environmental Impact Report (DEIR) does not include the Construction Plan to build up to 499 single story single-family (over 55) with a private club house/ recreation center at the 116.3 acre site adjacent to Laguna Creek. The proposed Construction Plan for Summer Villas has been the premise for the Notice of Preparation, and basis for discussion at the Community Meeting on May 29, 2025 at the Project Site, 9350 Sheldon Road, the NOP Scoping Meeting on September 23, 2024 and Public Meeting on November 13, 2025 for a public discussion of the DEIR for the Summer Villas. The Project Applicant's presentations included discussions of the Construction Plan. City of Elk Grove Staff presentations , explanations or responses to question raised by the public at these meetings never made it clear that the proposed Project Construction was not included in the much anticipated Project DEIR. The Community, in my opinion, understood the DEIR would be their opportunity to address the environmental impacts, health and safety issues community problems they felt the Summer Villas posed.

Letter 47 Cont.

These public meetings, absent this clarification, in my opinion, were misleading to the public in attendance and fostered the community-wide misunderstanding that all of their environmental issues, health and safety impacts and community concerns would be somehow addressed in the DEIR—which they, in my opinion, were not.

47-2 Cont.

In my opinion, there was a decision to somehow compartmentalize the proposed Summer Villas Project into small actions, separate and distinct planning components each requiring various future approvals to address potential additional enviormental impacts at dates , including the approval of the Special Planning Area (SPA) notedly without entitlements or any specific development proposals and future construction—all at unspecified dates and meetings. Each segmented action requiring additional approvals presents nothing but a tangled web of bureaucracy seemingly crafted to obscure the Public's understanding and obstruct the Public's Right to be Informed under CEQA. To exclude the Project Construction Plan from the Project DEIR was not transparent and misleading to the public.

47-3

Providing a Draft Environmental Impact Report (DEIR) without an adequate construction plan likely violates the California Environmental Quality Act (CEQA) requirement for a stable and accurate project description, making it vulnerable to legal challenge and potentially leading to project delays or denial.

The core issue is that a DEIR without sufficient project details, including construction plans, would:

47-4

Hinder informed decision-making: The lead agency's decision-makers and the public need a clear understanding of the project's specifics to evaluate its potential environmental effects, propose effective mitigation measures, and consider alternatives.

47-5

Prevent adequate environmental analysis: The CEQA process is intended to inform about potential environmental damage and identify ways to avoid or significantly reduce impacts. Without a construction plan, a lead agency cannot fully analyze all potential significant effects, such as impacts on air quality, noise, traffic, and hazardous materials.

47-6

Obstruct public participation: An accurate and stable project description is essential for meaningful public participation. If the details are too vague, the public cannot provide informed comments, thereby undermining a key feature of the CEQA review process.

Letter 47 Cont.

47-6 Cont. Lead to an inadequate document for future use: If construction details are not provided during the initial environmental review, other responsible and trustee agencies may be unable to complete their review or issue necessary permits, potentially requiring a supplemental or subsequent EIR later.

47-7 Risk litigation: The failure to present technical characteristics and instead presenting only concepts and impact maximums can lead to the EIR being found legally insufficient in court, which can halt the project until a compliant document is prepared.

47-8 While the level of detail required can vary between a general plan EIR and a specific project EIR, the lead agency cannot defer the analysis of significant impacts to a later date. A construction plan provides the necessary details to ensure all phases of the project's planning, implementation, and operation are considered.

47-9 CEQA Project Description, Absent "Unusual Circumstances ...Sep 17, 2019 — Environmental documents aimed at preserving a wide range of development options for a project site must be sufficientl...Kronick Moskovitz Tiedemann & Girard

General Plan Guidelines - Chapter 10Level of Detail in Analysis The general plan EIR need not be as detailed as an EIR for the specific projects that will follow (CEQ...

Governor's Office of Land Use and Climate Innovation (.gov)

CEQA Case Update: Court Holds that Approval of Project ...Apr 7, 2022 — In its decision, the Court recognized that an accurate project description is an essential component (the "sine qua non...

Mitchell Chadwick

47-10 **The Summer Villas Project DEIR does not include the required Construction Plan and, therefore, fails to address Safety and Evacuation Hazard studies and analyzes for Projects proposed to be located in identified hazard prone areas with the potential to exacerbate existing hazards or create new ones. Safety and Evacuation Hazard Studies are a Required Element in a Draft Environmental Impact Report (DEIR)**

47-11 **High Flood Risk:** The proposed Summer Villas Project covering 1116.3 of agricultural land is adjacent to Laguna Creek. Laguna Creek which has a FEMA designation of

Letter 47 Cont.

flood designation of AE. Zone AE signifies a high-risk flood zone with a 1% annual chance of flooding. The site on which Summer Villas has been proposed to be built has significant risk of flooding due to its proximity to the creek.

47-11 Cont.

•Key aspects of the analysis would include Identification of potentially significant affects of environmental hazards such as flooding, fires and release of hazardous materials how the proposed project might impact public safety in evacuating the project and surrounding community The analyzes would include :Assessment of Emergency Response and Evacuation Plans for potential conflicts with or impacts on existing or proposed emergency response and evacuation plans; Consistency with with federal, state, and local safety plans and regulations, including a City's General Plan Safety Element; Traffic and Access Routes are a crucial part of the analysis and involves examining how a project might affect evacuation times for both new and existing residents, and ensuring emergency vehicle access is maintained. Recent court rulings in California have reinforced the requirement for robust, quantitative analysis of evacuation routes and travel times.

47-12

The DEIR Domestic Water Demand Analaysis Water by Wood Rogers for treated water supply for Summer Villas to be provided by Sacramento County Water Agency(SCWA)/ Elk Grove Water District (EGWD) fails to fully address the potential impacts of future groundwater depletion and potential and unmitigated impacts to domestic wells in The South American Subbasin in Elk Grove.

47-13

The Elk Grove Water District (EGWD and the Sacramento County Water Agency (SCWA) are identified as the public water providers for the Summer Villas Project Area. When a Project Construction Plan is part of the Project's environmental review process, a Water Supply Assessment (WSA) is required to determine if planned water supplies for SCWA's Zone 40 are sufficient to meet the demands of this project in addition to existing and projected water supply obligations over the next 20 years. The Water Supply Master Plan has, therefore, not been provided for public review and comment in the Summer Villas DEIR due to the absence of a Construction Plan.

The DEIR for the Summer Villas states"project's water demand will require an additional water supply, and the SCWA Zone 40 Master Plan 2016 anticipates using both groundwater and surface water to meet this demand. The plan relies on a "conjunctive use" strategy, meaning the mix of groundwater and surface water will vary depending on hydrologic conditions. Additional wells are likely to be part of the long-term plan to meet water needs, particularly in drier years when surface water is less

Letter 47 Cont.

47-13 Cont. available, as described in the Sacramento County Water Agency (SCWA) water supply assessments.

Future demand: Meeting future water demands, including for new developments like Summer Villas, will require more than just conservation efforts and necessitate increased capacity, including new wells.

47-14 There is no guarantee of treated water for the Summer Villas Project by either SCWA or EGWD without constructing additional wells, as well as the replacement of many existing old wells in new locations due to current sites being too small for replacement wells, in addition to water quality concerns. Even with water conservation measures in place, new infrastructure is needed to meet future demand, especially with climate change expected to make dry years more frequent. Climate change is expected to lead to more frequent and intense dry years, which will affect the reliability of the surface water supply and increase the importance of reliable groundwater extraction.

SCWA has rights to use groundwater and will continue to do so to meet customer demands. In dry years, when less surface water is available, there will be a greater reliance on groundwater supplies from wells which can impact domestic wells. While the DEIR discusses the need to monitor domestic well water levels, monitoring does not mitigate the potential for dry wells nor does it fund the deepening or replacement of domestic wells in the Rural Community of Elk Grove.

47-15 More recent planning documents, such as the Water Supply Investment Plan (WSIP) and the Urban Water Management Plan (UWMP)were not addressed in the DEIR which would have provided a more accurate analysis and would have been studied if the Construction Plan for Summer Villas had been included in the Project DEIR as set forth in the Statutes.

47-16 The ommission of the Construction Plan from the DEIR, in my opinion, deprived the Public, in particular, the Rural Community surrounding this Project the required insight into the Summer Villas Project and the required opportunity to evaluate the Project's environmental impacts to their private domestic wells.

47-17 This public perspective which is a required by the CEQA process is critical for Public Agencies, The City of Elk Grove Planning Commission and City Council to render an informed decision on the Summer Villas Project DEIR is, therefore, missing.

Sincerely yours,

Suzanne Pecci

LETTER 47: SUZANNE PECCI

Response to Comment 47-1
Please see Master Response 1. The commenter's specific concerns related to the adequacy of the analysis within the Draft EIR are addressed in detail below.

Response to Comment 47-2
The following language is provided on page 5 of the NOP prepared for the Project, as well as on page 3-5 in Chapter 3, Project Description, of the Draft EIR:

> 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 CEQA review 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.

As such, both the NOP and the Draft EIR clearly state that the Project does not include immediate construction activities. Instead, the Draft EIR addresses the potential environmental impacts associated with future buildout of the site in accordance with the reasonably foreseeable development that would be permitted following the creation of the Summer Villas SPA. The Project Description includes specific details of future anticipated development, including specific permitted uses, maximum acreages, and maximum unit counts. The analysis presented throughout the Draft EIR is based on the assumption that future development would be at the maximum allowable scale, thus providing a conservative assessment of potential environmental impacts.

All future development within the Summer Villas SPA will be required to be consistent in nature and in scale with the permitted uses anticipated and analyzed in the Draft EIR; any development that would not be consistent with what was anticipated for the site in the Draft EIR would be required to undergo a separate CEQA process prior to approval to address any additional environmental impacts, which would likely include the opportunity for public review.

Furthermore, while the commenter characterizes the Project description as compartmentalization, consistent with the quoted language presented above, the Draft EIR is written in such a way that all components of the Project, as well as all associated potential environmental impacts, are addressed and analyzed. Please see Response to Comment 30-16.

Response to Comment 47-3
Please see Response to Comment 47-2 above.

Response to Comment 47-4
Please see Response to Comment 47-2 above.

Response to Comment 47-5
Please see Response to Comment 47-2 above, as well as Master Response 1.

Response to Comment 47-6
Please see Response to Comment 47-2 above.

Response to Comment 47-7
Please see Response to Comment 47-2 above.

Response to Comment 47-8
Please see Response to Comment 47-2 above.

Response to Comment 47-9
Please see Master Response 1.

Response to Comment 47-10
Please see Response to Comment 47-2 above, as well as Master Response 1. In addition, neither the CEQA Guidelines nor any City policy or ordinance require the preparation of a Safety and Evacuation Hazard Study as part of an EIR analysis. Nonetheless, potential impacts related to hazards and hazardous materials associated with the Project are addressed in Chapter 4.6 of the Draft EIR. As discussed under Impact 4.6-2, beginning on page 4.6-23, with implementation of mitigation, potential impacts related to creating a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment were determined to be less than significant. Potential impacts related to interfering with an adopted emergency evacuation plan are specifically addressed under Impact 4.6-3 on page 4.6-28; as discussed therein, such impacts were determined to be less than significant.

Response to Comment 47-11
Please see Master Response 1 and Response to Comment 47-10, above. Potential impacts related to flooding, fire hazards, and hazardous materials are addressed in Chapter 4.7, Hydrology and Water Quality, Chapter 5, Effects Not Found to be Significant, and Chapter 4.6, Hazards and Hazardous Materials, respectively, of the Draft EIR. As discussed under Impact 4.6-3 in Chapter 4.6, Hazards and Hazardous Materials, of the Draft EIR, the Project, as designed, would not interfere with or impair implementation of an adopted emergency response plan or emergency evacuation plan. Impacts related to inadequate emergency access were determined to be less than significant under Impact 4.11-5 of Chapter 4.11, Transportation, of the Draft EIR. As such, the Draft EIR adequately addresses potential impacts associated with the Project related to emergency vehicle access and evacuation. The site is not located within a High or Very High Fire Hazard Severity Zone and Mitigation Measure 4.7-5(a) of the Draft EIR requires that all future residential development be located outside of the 100-year floodplain. Therefore, a more detailed analysis of evacuation time is not warranted for the Project.

Response to Comment 47-12
The commenter's specific concerns related to the water supply are addressed in additional detail below in Responses to Comments 47-13 through 47-15.

Response to Comment 47-13
Although not labeled as a "Water Supply Assessment (WSA)" or "Water Supply Master Plan," contrary to the claim of the commenter, a report analyzing the Project's water demand has been prepared by Wood Rodgers in the form of the Domestic Water Demand Analysis and included as

Appendix L to the Draft EIR. Thus, the report was made available for public review. Furthermore, potential impacts related to water supply associated with future buildout of the site are addressed under Impact 4.10-7 in Chapter 4.10, Public Services and Utilities, of the Draft EIR. It should be noted that the language the commenter cites, specifically that the Draft EIR states that the "project's water demand will require an additional water supply," does not occur within the Draft EIR. Furthermore, pursuant to SB 610 and SB 221, a formal WSA is legally required for residential developments exceeding 500 dwelling units. Because the Project would include a maximum of 499 residential units, a formal WSA is not required.

Response to Comment 47-14

As discussed under Impact 4.10-7 in Chapter 4.10, Public Services and Utilities, of the Draft EIR, the Project would result in an increase in water demand beyond existing on-site conditions. However, as discussed therein, buildout of the site consistent with the proposed Summer Villas SPA, in combination with the existing Sheldon Park Estate Project located immediately north of the site across Sheldon Road, would result in a reduction in water demand from what was anticipated for the area in the Zone 40 Water System Infrastructure Plan Update (2016 SCWA Plan). According to the Domestic Water Demand Analysis prepared for the Project, previously modeled demands associated with the 2016 SCWA Plan more than compensate for the demand associated with both the Project and the Sheldon Park Estates Project units. Furthermore, as stated on page 4.10-32 of the Draft EIR, "Under existing agreements, EGWD anticipates that the district will continue to have sufficient water supplies through projected buildout conditions, including new development within Service Area 2, during multiple-dry-year conditions." Thus, adequate water supply is available to serve the Project, and impacts related to such were determined to be less than significant.

As discussed under Impact 4.10-6 in Chapter 4.10, Public Services and Utilities, of the Draft EIR, with respect to water supply infrastructure, the Project would connect to existing 18-inch transmission main at the Waterman Road/Elliott Springs Drive intersection at the southwest corner of the site, as well as to another 18-inch transmission main stub in Waterman Road near Calvine Road, approximately one mile north of the site. The Project would not include the installation of any new water wells. While it is true that the SCWA and/or the EGWD may install or expand wells to adequately meet the water demands of their districts, as discussed above, adequate water supply exists to serve the Project. Therefore, such utility expansions and/or improvements would be made to serve the district as a whole and would not be enacted to specifically accommodate the demand of the Project. In addition, assuming where any new water wells would be located would be speculative at this time, and, therefore, such an analysis is not required as part of the Draft EIR.

Response to Comment 47-15

Neither the SCWA nor the EGWD have a publicly available document called a Water Supply Investment Plan. In addition, contrary to the claim of the commenter, the EGWD UWMP is incorporated into the water supply analysis of the Draft EIR and is explicitly cited for the first time on page 4.10-5 in Chapter 4.10, Public Services and Utilities, of the Draft EIR.

Response to Comment 47-16

Please see Response to Comment 47-2 above.

Response to Comment 47-17

Please see Master Response 1.

Letter 48

From: Taran Meyer <meyertaran@gmail.com>
Sent: Friday, October 31, 2025 10:53 AM
To: Kyra Killingsworth <kkillingsworth@elkgrove.gov>
Subject: Summer Villas Planning Proposal

You don't often get email from meyertaran@gmail.com. Learn why this is important

[EXTERNAL EMAIL]

48-1 Hello, I am a lifelong resident of Elk Grove and a proud fourth-generation member of the community. Developing within the rural areas of Elk Grove would fundamentally change the character and purpose of our community. Allowing one development sets a precedent for others to follow, which could significantly alter the city's identity. Elk Grove has a rich history as a traditional farming town, and it is important to preserve that heritage and maintain the rural character that defines our community. Please reject this proposal, as it would drastically worsen the Sheldon area.

LETTER 48: TARAN MEYER

Response to Comment 48-1

Please see Master Response 1.

Letter 49

From: T Servin <servintuyen@gmail.com>
Sent: Tuesday, November 18, 2025 9:11 PM
To: Kyra Killingsworth <kkillingsworth@elkgrove.gov>
Subject: City of Elk Grove Development Services Department Planning Division-Summer Villas Special Planning Area Project

You don't often get email from servintuyen@gmail.com. Learn why this is important

[EXTERNAL EMAIL]

Dear Kyra Killingsworth:

My name is Tuyen Servin and I live across the proposed project site. Thank you for the opportunity to comment on the Summer Villas Special Planning Area Project (Project) Draft Environmental Impact Report (DEIR). I recognize the need for age restricted housing with the nation's aging population.However, the project as proposed will destroy the rural nature of this area of Elk Grove and the DEIR's analysis in its current state is woefully inadequate. 49-1

The DEIR Should Quantify and Discuss the Potential Cancer Risks from Project Construction

The Project will expose nearby communities to elevated levels of air pollution. Construction activities can result in high daily volumes of heavy-duty diesel truck traffic along local roadways and the operation of on-site equipment that emit diesel particulate matter (diesel PM) and contribute to regional air pollution. Diesel PM is a carcinogen that is linked to cancer and respiratory health effects, such as asthma. The community surrounding the Project site would be exposed to diesel PM during the construction of the proposed development.

Notably, there are residences located north, west, east and south of the Project site, with the closest residences located within approximately 140 feet of the Project's northern boundary. In addition to residences, the Project site is located within one mileof Pleasant Grove High School, and Katherine L. Albani Middle School. Notably, some of the residences near the Project site are located within the South Sacramento-Florin community, which has been designated as a disadvantaged community under Assembly Bill (AB) 617 (Garcia, Chapter 136, Statues of 2017).The boundaries were updated by the South Sacramento-Florin Steering Committee on July 22, 2024, and are the same for both the Community Air Monitoring Plan (CAMP) and Community Emissions Reduction Program (CERP). The South Sacramento- 49-2

2

Letter 49 Cont.

49-2 Cont.

Florin community was selected by the California Air Resources Board (CARB) for the development of a community emissions reduction program under Assembly Bill (AB) 617 due to its high cumulative exposure burden from mobile and stationary sources of air pollution. The census tracts within the area adjacent to the Project site score as high as the 50th percentile in CalEnviroScreen 4.0, which is based on a set of indicators in four components (Exposures, Environmental Effects, Sensitive Populations, and Socioeconomic Factors).

49-3

Due to the numerous existing sensitive receptors located near the Project site, including residences and schools, the City must ensure the DEIR includes a robust analysis of all potential air quality and health risk impacts and implements the most stringent mitigation measures available to protect public health.Construction of the Project would result in short-term diesel PM emissions from the use of both on-road and off-road diesel equipment. Guidance issued by Hazard Assessment Office of Environmental Health Hazard Assessment (OEHHA) recommends assessing cancer risks for construction projectswith an exposure duration of more than 6 months for the duration of the project. Since Project construction would likelyoccur over a period of two years as presented in the DEIR, a construction health risk assessment (HRA) should be prepared for the Project which would include health risks for existing residences and schools near the Project site during construction. The construction HRA should also account for all diesel PM emission sources related to Project construction activities, including, but not limited to, off-road mobile equipment, diesel generators, and on-road heavy-duty trucks.

49-4

Moreover, mitigation measure 4.2-7(b) as drafted is insufficient to address concerns related to potential health risk impacts. Mitigation measure 4.2-7(b) states:

> TACM-8: All off-road construction fleet used during construction of the Project shall include Environmental Protection Agency certified off-road Tier 4 diesel engines (or better).

The mitigation measure does not address the possible event in which the Project is unable to obtain Tier 4 engines during construction based on inventory availability, which would be required for all pieces of off-road equipment, to achieve the desired emission reductions.

49-5

The DEIR Fails to Evaluate an Existing Applicable Plan,Policy or Regulation of an Agency Adopted for the Purpose of Reducing the Emissions of Greenhouse Gases (GHGs).

While the DEIR does analyze the Project's consistency with the City of Elk Grove's Climate Action Plan, the DEIR's analysis isat the very least incomplete and at worst grossly misleading as itfails to assess consistency with other regulations and/or plans including but not limited to Sacramento Area Council of Governments' Metropolitan Transportation Plan/Sustainable Communities Strategy, CARB Scoping Plan, Executive Order B-55-18, Senate Bill 32, and AB 1279.

49-6

The DEIR Fails to Properly Mitigate the Project's GHGEmissions

Letter 49 Cont.

49-6 Cont.

While DEIR found that the Project would result in a significant and unavoidable impact regarding the Project's GHG emissions, it does not obviate the City's responsibility to mitigate GHG emissions to the extent feasible. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality and GHG impacts.

Mitigation measure 4.2-7(a) states:

> The Project shall either (i) be designed such that the project is built all-electric, and natural gas infrastructure shall be prohibited on-site; or (ii) be designed to include pre-wiring to allow for the future retrofit of all natural gas appliances with all-electric appliances and the Applicant shall purchase off-site mitigation credits or forecasted mitigation units ("FMUs") (collectively, "GHG credits") for project-related GHG emissions from the component(s) using natural gas instead of electric, as set forth in further detail below.

49-7

This mitigation measure conflicts with the language drafted in mitigation measure 4.2-7(b) which states:

> BE-6: The Project shall require at least 10 percent of the proposed residential units to include exclusively electric appliances and HVAC systems.

The mitigation measures should be revised accordingly for consistency. Notably the CalEEMod modeling mitigated output presented in Appendix C of the DEIR already assumes that the entire Project would be all-electric, which would conflict with mitigation measure 4.2-7(b), rendering BE-6 moot for the purposes of analysis.

Furthermore, some mitigation identified within the DEIR is not reflective of current law. Mitigation measure 4.2-7(b) states:

> BE-4: The Project shall comply with 2019 CALGreenTier 1 standards, including a 15 percent improvement over minimum Title 24, Part 6, Building Energy Efficiency Standards.

49-8

However, updates to Part 11 of the Title 24 Building Standards Code will become effective on January 1, 2026. At the very least, the Project would need to comply with the 2022 California Building Energy Efficiency Standards for Residential Buildings and CALGreen (CCR Title 24, Parts 6 and 11) that are currently in effect, or the later applicable versions, which are inherently *more* stringent than the 2019 Title 24 Building Standards Code.

Conclusion

49-9

The Project's rural location would increase vehicle miles traveled beyond the City's thresholds, generate higher GHG emissions compared with the City's existing General Plan designation for the site, and expand the development footprint into agricultural lands. These factors collectively conflict with statewide and regional strategies to reduce GHG emissions. The Project would be more appropriately located within an area of the City that provides pedestrian, bicycle, and transit infrastructure currently absent at the proposed site.

Sent from my iPhone

LETTER 49: TUYEN SERVIN

Response to Comment 49-1

The comment is an introductory statement and provides a summary of the commenter's general concerns regarding the Project and the Draft EIR analysis. Detailed responses regarding the commenter's concerns are provided in Responses to Comments 49-2 through 49-9 below.

Response to Comment 49-2

Health risks resulting from exposure to TACs are dependent both on dosage and the exposure period. Both factors were considered when assessing the potential impacts resulting from emission of DPM during Project construction. Pages 4.2-45 through 4.2-46 of the Draft EIR present a discussion of the limited duration of potential exposure, as well as the existing regulations that would reduce the emission of DPM during construction activities. For instance, Project construction would be limited to a two-year period, and all off-road equipment operating at the site would be subject to the In-Use Off-Road Diesel Vehicle Regulation, which requires increasingly stringent emissions standards be met by off-road equipment. Thus, nearby receptors would not be exposed to emissions from on-site construction equipment for a substantial amount of time, and emissions from on-site construction equipment must be reduced in compliance with the existing statewide regulations related to off-road diesel vehicles.

In addition, a key finding of the CARB's Air Quality and Land Use Handbook: A Community Health Perspective is that emissions of DPM are highly dispersive, and concentrations diminish rapidly with distance from the source. Because DPM is highly dispersive, the fact that construction equipment would operate intermittently throughout the entire approximately 115.9-acre site would have a large effect on the potential for Project construction to result in health-related impacts through emissions of DPM. The large area of the site would allow DPM to disperse and concentrations to decrease prior to exposure of receptors at the nearest residences, and DPM concentrations at Pleasant Grove High School, Kathrine L. Albani Middle School, and the South Sacramento-Florin Community, which are located even further from the site, would be negligible. Such dispersal reduces the likelihood that the Project would result in health-related impacts.

Furthermore, as discussed under Impact 4.2-3 of the Draft EIR, the Project's construction-related emissions would be below the applicable mass emissions threshold of significance for PM_{10}. According to CARB, more than 90 percent of DPM is less than one micrometer in diameter,[10] and, thus, DPM is a subset of $PM_{2.5}$, which comprises a portion of PM_{10}. As a California statewide average, DPM comprises about eight percent of $PM_{2.5}$ in outdoor air,[11] and would represent an even smaller percentage of PM_{10} emissions. Considering that the Project's construction-related PM_{10} emissions, which include emissions of DPM, would be below the SMAQMD's thresholds of significance, construction of the Project would not be expected to generate substantial DPM emissions such that an increase in cancer risk levels of more than 10 in one million persons or a non-cancer hazard index greater than 1.0 would occur.

Based on the above and consistent with the discussion presented in Impact 4.2-3 of the Draft EIR, a quantitative analysis of health risks related to Project construction is not warranted, as the

[10] California Air Resources Board. *Inhalable Particulate Matter and Health ($PM_{2.5}$ and PM_{10}).* Available at: https://ww2.arb.ca.gov/resources/inhalable-particulate-matter-and-health. Accessed June 2025.

[11] California Air Resources Board. *Overview: Diesel Exhaust & Health.* Available at: https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health. Accessed June 2025.

specific details of Project construction have been analyzed and determined not to represent a significant risk to public health.

Response to Comment 49-3

Please see Response to Comment 49-2. In addition, the commenter's claim that Office of Environmental Health Hazard Assessment (OEHHA) recommends that projects lasting more than six months be evaluated for cancer risks to nearby sensitive receptors is misleading. The likely source of the commenter's claim is presented in the following quoted text from page 8-18 the OEHHA Air Toxics Hot Spots Program Risk Assessment Guidelines:

> Due to the uncertainty in assessing cancer risk from very short-term exposures, we do not recommend assessing cancer risk for projects lasting less than two months at the MEIR. We recommend that exposure from projects longer than 2 months but less than 6 months be assumed to last 6 months (e.g., a 2-month project would be evaluated as if it lasted 6 months). Exposure from projects lasting more than 6 months should be evaluated for the duration of the project. In all cases, for assessing risk to residential receptors, the exposure should be assumed to start in the third trimester to allow for the use of the ASFs (OEHHA, 2009). Thus, for example, if the District is evaluating a proposed 5-year mitigation project at a hazardous waste site, the cancer risks for the residents would be calculated based on exposures starting in the third trimester through the first five years of life.

However, the paragraph quoted above includes recommendations related to how to conduct a health risk assessment (HRA), not whether or not cancer risks should be evaluated if project construction exceeds six months. The commenter appears to misconstrue OEHHA's recommendation that exposure from projects lasting more than six months should be evaluated for the duration of the project, as direction that all projects longer than six months be analyzed. However, in the context of the entire paragraph presented above, the OEHHA guide seems instead to be providing recommendations on the exposure periods to be used in preparing HRAs without providing direct guidance as to whether or not a HRA should be prepared. In fact, in the Introduction section of the OEHHA Guide, OEHHA states "[t]he Hot Spots Act requires that each local Air Pollution Control District or Air Quality Management District (hereinafter referred to as District) determine which facilities will prepare a HRA."[12] According to the SMAQMD 2025 Annual Report on the Air Toxics "Hot Spots" Information & Assessment Act,[13] facilities subject to the Hot Spots Program include large sources (Core Facilities) such as power plants and landfills that emit more than 10 tons/year of total organic gases (TOG), NO_X, sulfur oxides (SO_X), or PM, as well as smaller classes of sources, called industrywide facilities, such as diesel-fueled backup generators, retail gas stations, and chrome platers. The quoted text from the Introduction section of the OEHHA Guide demonstrates that the OEHHA Guide is not intended to define what projects must be assessed in a HRA, but instead that the guide is intended to establish consistent methodologies for the assessment of health risks where such assessments are deemed necessary by other entities.

Response to Comment 49-4

Contrary to the commenter's claim, Mitigation Measure 4.2-7(b) is not intended to address concerns related to potential health risk impacts, as health risk impacts were determined to be less than significant within the Draft EIR (see Impact 4.2-3). Rather, as discussed on page 4.2-63

[12] Office of Environmental Health Hazard Assessment. *Air Toxics Hot Spots Program Risk Assessment Guidelines* [pg 1-3]. February 2015.

[13] Sacramento Metropolitan Air Quality Management District. *2025 Annual Report on the Air Toxics "Hot Spots" Information & Assessment Act* [pg. 1]. October 2025.

of the Draft EIR, Mitigation Measure 4.2-7(b) would ensure compliance with the applicable measures of the City's CAP, which are intended to reduce GHG emissions within the City. Further, as discussed on page 4.2-62 of the Draft EIR, the Applicant has committed to requiring that all off-road construction equipment used during Project construction be EPA-rated Tier 4 final, which would be ensured through Mitigation Measure 4.2-7(b). Tier 4 final engine off-road construction equipment is readily available and routinely supplied by heavy equipment manufactures within the State. In addition, as discussed on page 4.2-51 of the Draft EIR, starting January 1, 2024, all newly added engines to fleets with a total horsepower over 2,501, excluding non-profit training centers, must be Tier 4 final or higher.[14] Thus, Tier 4 final engine off-road construction equipment is the standard baseline for modern diesel fleet additions, and it is highly unlikely that the Project would be unable to obtain Tier 4 final engine off-road equipment for use in Project construction activities.

Response to Comment 49-5

The SMAQMD BMPs were established in compliance with the Statewide CARB GHG reduction targets, including the 2045 target of carbon neutrality established by Executive Order (EO) B-55-18 (Assembly Bill [AB] 1279), by focusing on reducing GHG emissions related to natural gas and vehicle trips, which are widespread sources of GHG emissions. The SMAQMD BMPs are also consistent with guidance from other agencies, including the OPR and the CARB. Similarly, the City of Elk Grove CAP has taken into consideration emissions reduction strategies set forth in AB 32, SB 32, EO B-30-15, and EO S-03-05, as well as the State's Climate Change Scoping Plan. As such, the Project's compliance with the SMAQMD thresholds and City of Elk Grove CAP would also be considered compliance with the plans noted in the comment letter.

Response to Comment 49-6

The relevant threshold for assessing GHG emissions associated with the Project is the Project's consistency with both the SMAQMD BMPs and the City's CAP. Implementation of Mitigation Measure 4.2-7(a) would ensure compliance with SMAQMD BMP-1 and BMP-2. Additionally, implementation of Mitigation Measure 4.2-7(b) would ensure compliance with the applicable CAP Measures. However, with regard to SMAQMD BMP-3 and TACM-6, as discussed further in Chapter 4.11, Transportation, of the Draft EIR, the effectiveness of the TDM strategies included in Mitigation Measure 4.11-4, required by Mitigation Measure 4.2-7(c), cannot be quantified or guaranteed at this time, and subsequent vehicle trip reduction effects cannot be guaranteed. Therefore, based on the above and due to uncertainties regarding Mitigation Measure 4.2-7(c), the Draft EIR concluded that the Project's impact would remain significant and unavoidable. The mitigation measures included in the Draft EIR are targeted at ensuring Project consistency with the SMAQMD BMPs and the City's CAP. Additional mitigation measures would not result in the Project being further consistent with the SMAQMD BMPs or the City's CAP. Thus, the mitigation measures included within the Draft EIR regarding the Project's GHG emissions represent all feasible mitigation, and further mitigation is not warranted.

Response to Comment 49-7

The SMAQMD requirements and CAP Measure BE-6 requirements are different, as BE-6 only encourages and incentivizes new residential developments to include all-electrical appliances and HVAC systems, while SMAQMD requires the prohibition of all natural gas usage on-site. As discussed on page 4.2-61 of the Draft EIR, the Project applicant has committed to requiring at

[14] California Air Resources Board. *In-Use Off Road Diesel-Fueled Fleets Regulation Overview*, *Revised October 2016*. 2016.

least 10 percent of the proposed units to include exclusively electrical appliances and HVAC systems, which would be ensured through Mitigation Measure 4.2-7(b). However, the remaining Project components could still include natural gas usage. As discussed on page 4.2-58 of the Draft EIR, Project specific information is not available to ensure that the Project would be designed and constructed without natural gas infrastructure. Thus, compliance with the SMAQMD natural gas requirements would be ensured by Mitigation Measure 4.2-7(a). While Mitigation Measure 4.2-7(a) would allow for the use of natural gas if emissions associated with natural gas usage are offset through the means described in Mitigation Measure 4.2-7(a), such natural gas usage would only be allowed in the remaining portions of the Project beyond those required to be all electric by Mitigation Measure 4.2-7(b). Both Mitigation Measure 4.2-7(a) and Mitigation Measure 4.2-7(b) are required to ensure consistency with the separate requirements established by SMAQMD and the City's CAP. Overall, revisions to the mitigation measures are not warranted.

With regard to the mitigated CalEEMod modeling conducted for the Project, even if natural gas is to be used on-site, Mitigation Measure 4.2-7(a) requires that all emissions associated with such natural gas usage be offset. Thus, energy emissions associated with the Project would ultimately be consistent with the emissions presented in the mitigated CalEEMod modeling conducted for the Project.

Response to Comment 49-8

The Project would be required to comply with all mandatory requirements included in the most recently adopted CALGreen Code (currently the 2025 CALGreen Code). Additionally, as discussed on page 4.2-61 of the Draft EIR, the Project applicant has committed to comply with CALGreen Tier 1 standards, which would be ensured through Mitigation Measure 4.2-7(b).

In response to the comment, Mitigation Measure 4.2-7(b) within Chapter 4.2, Air Quality, Greenhouse Gas Emissions, and Energy of the Draft EIR is hereby revised as follows:

> *4.2-7(b) Prior to issuance of any grading or building permits, <u>whichever comes first,</u> Project Grading and Building Plans shall demonstrate compliance with the following applicable measures included in the City's Climate Action Plan, to the satisfaction of the City of Elk Grove Community Development Department:*
>
> - *BE-4: The Project shall comply with ~~2019~~ CALGreen Tier 1 standards, including a 15 percent improvement over minimum Title 24, Part 6, Building Energy Efficiency Standards.*
> - *BE-6: The Project shall require at least 10 percent of the proposed residential units to include exclusively electric appliances and HVAC systems.*
> - *BE-7: The Project shall include rooftop solar PV panels.*
> - *TACM-8: All off-road construction fleet used during construction of the Project shall include Environmental Protection Agency certified off-road Tier 4 diesel engines (or better).*

Response to Comment 49-9

Impacts related to increased VMT are addressed in Chapter 4.11, Transportation, of the Draft EIR; impacts related to GHG emissions are addressed in Chapter 4.2, Air Quality, Greenhouse Gas Emissions, and Energy of the Draft EIR; potential impacts to agricultural lands are addressed in Section 5.3, Agricultural Resources, of Chapter 5, Effects Not Found to be Significant, of the Draft EIR. Comments related to the location of the Project do not address the adequacy of the

Draft EIR. The comment has been noted for the record and will be forwarded to the decision-makers for their consideration.

Letter 50

From: Vanessa Ulibas <vanessamulibas@hotmail.com>
Sent: Friday, October 31, 2025 9:35 AM
To: Kyra Killingsworth <kkillingsworth@elkgrove.gov>
Subject: Public Comments Regarding 499 Units

You don't often get email from vanessamulibas@hotmail.com. Learn why this is important
[EXTERNAL EMAIL]

Hello,

I became aware that there would be additional high density development occuring along Sheldon/Waterman.

50-1 Not only is this long maintained rural area of ELk Grove, that would bring additonal traffic, crime, and additonal polution. This area of Elk Grove parks and rec have not been updated. Not only is this area going to bring in additional polution, development and crime in a rural development, our parks and area is on the decline. This is highly unnaceptable. More develpment needs to be focused in maintanance of what we in this area have than bringing in more and more development housing projects that significantly reduce the climate of this division .

By sending us an email (electronic mail message) or filling out a web form, you are sending us personal information (i.e. your name, address, email address or other information). We store this information in order to respond to or process your request or otherwise resolve the subject matter of your submission.

Certain information that you provide us is subject to disclosure under the California Public Records Act or other legal requirements. This means that if it is specifically requested by a member of the public, we are required to provide the information to the person requesting it. We may share personally identifying information with other City of Elk Grove departments or agencies in order to respond to your request. In some circumstances we also may be required by law to disclose information in accordance with the California Public Records Act or other legal requirements.

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LETTER 50: VANESSA ULIBAS

Response to Comment 50-1

Please see Master Response 1.

Letter 51

[EXTERNAL EMAIL]

Dear Mayor Singh-Allen and Members of the Elk Grove City Council,

I am writing as a resident of Elk Grove who cares deeply about our city's future, and I respectfully express my strong opposition to the proposed **Summer Villas** project.

51-1 Elk Grove's rural landscape and open character are what make it such a wonderful place to live. Developments like Summer Villas threaten to erode that charm and transform our community into yet another congested city. The project's size and density appear inconsistent with the surrounding area, which will likely worsen traffic congestion, strain parking, and diminish the quiet neighborhood environment residents value.

51-2 Additionally, the city's current infrastructure and services may not be sufficient to support the added population, placing extra pressure on our roads, schools, and public resources. I urge the Council to consider development that maintains the balance between growth and preservation — protecting what makes Elk Grove unique.

I respectfully ask that you:

51-3
- Reject or substantially revise the Summer Villas proposal in its current form.
- Ensure transparent studies on traffic, environmental, and community impacts.
- Prioritize projects that align with the city's rural heritage and residents' quality of life.

Thank you for your time, service, and thoughtful consideration. I hope you will represent the community's voice by preserving the livability and rural charm that make Elk Grove so special.

Viet Nguyen
Resident of Feikert Elementary Area

LETTER 51: VIET NGUYEN

Response to Comment 51-1
Please see Master Response 1.

Response to Comment 51-2
Please see Master Response 1. Discussions regarding transportation and public services impacts can be found in Chapter 4.10, Public Services and Utilities, and Chapter 4.11, Transportation, of the Draft EIR.

Response to Comment 51-3
Please see Master Response 1. The comment has been noted for the record and will be forwarded to the decision-makers for their consideration.

Summer Villas Draft EIR – Special Planning Area (PLNG23-007) **Letter 52**
Public Comment Meeting
Comments/Questions from the Public

52-1 **Comment 1:** You treated all the topic areas the same, is that correct? To me, aesthetics is less important than transportation, aesthetics is about beauty and transportation is about time and cost, so if I was evaluating alternatives relative to this area, I wouldn't treat them all the same.

52-2 **Comment 2:** Can you identify for me what transportation means? Are you talking about the vehicle traffic in the area specifically?

52-3 **Comment 3:** What is the threshold that you are looking at for VMT? If there is a change?

52-4 **Comment 4:** What if we feel in the rural area there are more significant and unavoidable impacts which you have outlined here and do we address them in the comment section and do you give us the counter argument or maybe agree with us?

52-5 **Comment 5:** I was curious when it comes to greenhouse gases and particular matter, did you compare the build out time frame, between the various alternatives? For example, if you were to build out the 499 in a compressed timeframe versus the no build out pursuant to general plan alternative, it would be built out infrastructurally rather quickly, but the homes wouldn't be built out for over a long period of time. Did you compare it in that fashion too? You wouldn't have the concentration of the greenhouse gases and those impacts, they would be lessened pursuant to the general plan because of the timeframe to build out the whole of the project.

52-6 **Comment 6:** Why are two out of three alternatives start with no project?

52-7 **Comment 7:** With respect to air quality, how much fill are you going to have to provide and bring into that area to raise that site? Does your air quality take into consideration the time period for the construction and the fill to be brought in and the particulate matter? You are focusing on vehicle miles traveled, but are you focusing at all on the years that this project may take to bring in the fill to prepare the site to even build the project and is that part of the air quality analysis because that is part of the concern from the people that live in the rural area because they breathe in the particulate matter all day long. Is that part of what you have analyzed and is there a phasing of the analysis? Is that part of what you are analyzing?

52-8 **Comment 8:** Copies are at the library upstairs, but the library couldn't find the copies. The library should know where the copies are when asked. Where would you find the copies/document at City Hall? Also, can you email, write in handwriting and turn into the office or what?

52-9 **Comment 9:** Less than significant was transportation with the implementation of the required mitigation measures. How can you mitigate the volume of traffic? You measure 500 units and you have 1.5 vehicles per unit that's 1500 vehicles going in and out of that area daily or more, so that 1.5 per household, so it averages 13 miles vehicle travel in Elk Grove. So how do you mitigate it? Why is transportation less than significant even with mitigation?

52-10 **Comment 10:** Concern with wording on no project, no project build out, no build, and aquatic resource avoidance alternative it's very confusing. What is this wording and would like them defined tonight?

Letter 52 Cont.

52-11 **Comment 11:** I have something that tags on to how transportation will be mitigated, I don't see how this project could happen without widening the rural roadways. General Plan is built on having small roadways. Where in the EIR is that addressed? It will significantly impact the road at Waterman and Sheldon and Elliott Springs being down the road. Sounds like it will be an afterthought.

52-12 **Comment 12:** I read the EIR online and didn't find the comment letters, they weren't attached to the online EIR document, where are the comment letters from the public and public agencies?

52-13 **Comment 13:** I have concerns reading through the EIR about the two roundabouts. Both roundabouts have had fatal accidents and would like that addressed. The Bradshaw roundabout is really dangerous and would like that addressed.

52-14 **Comment 14:** I'd like to revisit the two no project applications. When I read the Cal code regulations 15126.6 I see everything in a singular rather than a dual or multiple no build out. What citation can you give us that there will be two no projects, one as it stands right now and one that quotes a no build out based on what? Is it net two acres or gross two acres? Is there no other alternative that could be used? Would like to see a five- to 10-acre horse community that would fit within this rural community rather than put in something that is opposite of what we would like to see. Doesn't mean you maximize the build out, I don't see that the second one is even authorized and are you trying to use it as a baseline?

The second one has a plan that is not on the books right now of a complete build out, it doesn't satisfy any of the objectives, I assume that is why you don't use it as an alternative but use it in the graphs as shown. Just trying to figure out why it is even there, where is the statutory authority for it? Does the total build out need a separate EIR as it stands with the General Plan? Will it require another impact report?

52-15 **Comment 15:** *Question at 38:20 (could not hear*) something about a subdivision map that went through the process about 15 years ago that had a mitigation negative declaration and there was some concern of the environment and there was an environmental document, and it did comply with the general plan. Sheldon Park Estates also went through a mitigated negative declaration.

52-16 **Comment 16:** Is there a coordination with the water supply master plan and Zone 40 with Sac County and Agencies within Zone 11A? Because this does depend on that, will there be ground water calculations? Will we see a water supply master plan that goes with this project? Because ground water pumping will still happen with municipal water supply and this group is very interested in being able to monitor their wells. Will we be able to see the coordination of that water supply master plan coordinated with this project? A lot of domestic wells are dependent on ground water levels. So this is a concern of everyone in this group?

52-17 **Comment 17:** What are you guys going to do to keep it rural and for those who want to ride and have no place to go and ride? You are forcing people with horses out of the area? What are you going to do to keep us safe on the roads with all that traffic and what are you going to do to help us keep it rural for equestrian use? Are you going to take down all the signs that are posted on Sheldon that you can ride your horse?

52-18 **Comment 18:** I would like to comment on the speeding on the road. My grandma and I got hit from behind and the car got totaled and want that to be taken into consideration, just turning into

Letter 52 Cont.

52-18 Cont. our house is unsafe and someone cuts us off and passes us all the time. It's not safe and should be taken into consideration. Will you be taking that into consideration?

52-19 **Comment 19:** There are still concerns with livestock and people raising cattle. Cattle get out and get in the middle of the road and people are speeding and not taking into consideration the livestock. It'll make traffic even worse; how will you address that?

52-20 **Comment 20:** If they are changing the roundabout on Waterman, is that so they can align Waterman to go all the way through? Is that the eventual plan? I'd like that addressed.

52-21 **Comment 21:** Question on the impact on the school system? Elk Grove is known for its school because the API index is so high but if we keep increasing the population density that will affect the quality of education that we provide and none of us would like that to happen. How will the increase impact the school system? The second question is about water inadequacy because the more homes there are the less water is available to those who have wells in the rural area. The third thing is contamination of the water, more homes will affect the sewer system, will they have septic tanks? What kind of sewer system for these homes? What is the plan for that because that will affect the water supply?

52-22 **Comment 22:** Is there a way that we can get a count of the units that are proposed/supposed to be built on previous plans that were submitted?

52-23 **Comment 23:** My question is related to the areas of transportation. Who is the subject matter expert on transportation, is that someone in house? Or was any of the local law enforcement agencies contacted related to the impact they would see? Sheldon Road was never addressed by the City for traffic mitigation, the original plan was to have Calvine Road with six lanes and Bond Road with four lanes to keep the traffic off Sheldon Road and so far nothing has been addressed relative to that. Would that be part of the expertise or part of your plan?

52-24 **Comment 24:** Transportation being identified as less than significant and, in the report, it says that VMT counts as full range of usage, you are excluding a significant number of trips. The estimate is understated and needs to be recast. I didn't see the transportation impact in the executive summary, is that just my oversight? You have limited your projection because you have excluded the resident calculation which VMT requires and it's in the definition.

52-25 **Comment 25:** Could you please tell me what category the uniqueness and historical value of the rural area is addressed? A lot of us have lived here generations. I would argue that the rural area of Elk Grove is the soul of Elk Grove, so I would like to know where it is addressed that if this project goes through what happens to the uniqueness, what we value in the rural area, the peace of mind, the quality of life, and our animals, etc. etc.? I couldn't find it in the document, could you point me in the right direction?

52-26 **Comment 26:** Thank you for having this meeting tonight. I have concerns about the creek that runs through the area, my concern is, are the numbers going to be adequate enough that we are not going to have flooding in that region and will there be adequate storm water capture and run off? Where is all that water going to go? Also, the animals and species that might be in that Laguna Creek area, and what harm will come to them?

52-27 **Comment 27:** This area is in Sac county Zone 13 special flood hazard plain area, and I live in an area similar to that regarding flood events. The Laguna Creek is a low point in water shed and

52-27 Cont. all these properties drain that way so you are filling it, but the evacuation plan how would that work with two lanes and roundabouts? How do you get people out of senior centers in an evacuation that don't drive? *(the remaining comment was cut off due to tape recording ending)*

52-28 **Comment 28:** The traffic is so bad on that road, my dad was killed on that road. The traffic is tremendous, and cars are constantly going into the ditches, a 17-year-old got killed recently. Traffic is backed up every day on that roundabout. If you are adding 499 units, it will make it even worse. Cars are constantly hitting fences and trash cans, cows, 2 bicyclists got hit recently. Do you take into account how many accidents take place there and look at police reports?

52-29 **Comment 29:** I wanted to clear up my comment about compatibility with neighborhood and surrounding area, that's in the executive summary page 2-6 middle ways down, it's because it meets most of the project objectives.

52-30 **Comment 30:** I did not see in any of the paperwork in addressing the family of red foxes (that are endangered I believe) that have lived there for a number of years and they travel through the waterways, the wetlands, the easements and such (all around our area) and did not see anything addressed about them?

52-31 **Comment 31:** Traffic needs to be addressed by google maps because it directs all traffic down our lane. We need more landscaping in the road to deter the traffic. I'm concerned about the baseline, it doesn't meet any of the objectives by the code. The objectives are furnished to staff by the applicant, so the applicant outlined the objectives of the project by what you are working with whether it meets or doesn't meet. The first line is about three objectives to create a special planning area to change from rural to non-rural and the other is to change the zoning density to accommodate this project. Without those two objectives we wouldn't have a project. The third is to preserve some open space and it would be nice if the creative work of the applicant could be explained what is required? It's not for the red foxes. What is required within those objectives of the applicant? I think we would have a higher percentage of non-compliance. I'm still concerned about the baseline and that it's being used as a comparison in the graphs?

52-32 **Comment 32**: I think that the road impacts and the water/sewer impacts are significant and they are definitely not being highlighted in this document. Why aren't they on our significant and unavoidable list of 8 that went out?

52-33 **Comment 33:** Concern about future development? I noticed on the diagrams for the water services coming in. I want to get on the record that it looks like there are plans for future development? Is that true?

52-34 **Comment 34:** Can you address why the sewer/water and road impacts are considered insignificant and unavoidable?

52-35 **Comment 35:** If you take the sewer/water/road impacts which are required for the project, which are also required for the aquatic alternative. They are not required for the build out pursuant to the general plan. How can you possibly arrive that the aquatic alternative is somehow superior to the build out of the general plan? We really need an answer to that?

52-36 **Comment 36:** Getting back to drainage and the FEMA area. Is any part of this looking at map revisions or conditional map revisions part of this EIR? Why go forward with all this if you don't have a conditional map revision from FEMA? Why talk about all this and make all these plans

52-36 Cont. unless you know this will pass with revising the map and still be in accordance with FEMA? There are also recorded flowage and drainage easements on this project, so are all those abandoned in this process? Are the agencies (Army Corp, Fish and Wildlife) are they all on board with this? Are all these preapprovals done before we get all the critical issues addressed and the critical infrastructure in this area addressed?

52-37 **Comment 37:** I have a comment about fire safety, and the report says the development will act as a fire brick. I would reference Paradise, Alta Dena and other communities that were decimated. If you had 499 homes to the Southeast corner, you have basically eliminated a westward evacuation for anyone living on Sheldon Road between Bradshaw and Waterman. I don't think that was considered when the report says no significant fire issues? Concerned about the evacuation on the West? Was it considered?

52-38 **Comment 38:** I think that we can recognize that we have various ages and generational community. We want to pass these homes down, and if there are a diversity of homes/units how will that affect us? How will you have almost 500 homes and our generational homes?

52-39 **Comment 39:** If this project gets approved and they start the infrastructure, but the project owners decide it isn't feasible and here we sit with infrastructure, and they sell it to a developer who wants to put in single family homes. What happens then? How will that affect us?

52-40 **Comment 40:** I want to say this out load, the draft EIR maintains that the eight significant and unavoidable issues pertaining to the project also pertain to the build out pursuant the general plan alternative, how is that possible? That requires a lot of justification on your part?

52-41 **Comment 41:** How can the City even consider the rezone to the AG RES, or the environmental impacts? It definitely impacts all these critical items.

52-42 **Comment 42:** Going back to air quality, I noticed on the Northeast corner of Waterman and Sheldon, I noticed no watering trunks at the development and a tone of dust going up, why is that happening on that corner? Is your firm going to regulate that?

52-43 **Comment 43:** I realize that we are here because the project is in the City limits of Elk Grove, but the project doesn't stay within the General Plan of the rural area of Elk Grove and Elk Grove needs to preserve the rural area for families that want to have 4H kids and livestock and does affect what we are all about. It's in the City and the City needs to preserve it like they promised.

52-44 **Comment 44:** Who is the developer for Sheldon Park Estates? That project is feasible but this one on the other side of the street isn't'? Why? It doesn't make much sense.

52-45 **Comment 45**: The impact for 4-11 for last one on the list of eight, says conflict are being inconsistent with CEQA guidelines section 15064.3 subdivision B mean? Is that the only one that addresses the transportation? Isn't everything in the Aesthetic 4 chapter?

52-46 **Comment 46:** I have a question about our safety and access? We only have one way out of the road, if we have a fire and there is traffic, we wouldn't have enough room to get out. If you have that many people in the area there wouldn't be time to get out.

LETTER 52: TRANSCRIPTION OF VERBAL COMMENTS: DRAFT EIR PUBLIC MEETING (NOVEMBER 13, 2025)

Response to Comment 52-1
Please see Response to Comment 12-2.

Response to Comment 52-2
A discussion of transportation impacts related to the Project can be found in Chapter 4.11, Transportation, of the Draft EIR. As stated therein, the Transportation chapter addresses the transportation conditions with the Project vicinity, including considerations of Project impacts related to pedestrian facilities, bicycle facilities, transit facilities and services, VMT, and traffic safety issues.

Response to Comment 52-3
Please see Response to Comment 24-16.

Response to Comment 52-4
The comment does not address the adequacy of the Draft EIR. Any comments received during the public review period for the Draft EIR are addressed in Chapter 2, Responses to Comments, of the Final EIR.

Response to Comment 52-5
As determined in Chapter 4.2, Air Quality, Greenhouse Gas Emissions, and Energy, of the Draft EIR, construction activities would result in criteria pollutant emissions, including particulate matter emissions, below the applicable SMAQMD thresholds of significance, and a less-than-significant impact would result. Furthermore, as shown in Table 4.2-11 in Chapter 4.2, Air Quality, Greenhouse Gas Emissions, and Energy, of the Draft EIR, construction activities would result in GHG emissions below the applicable SMAQMD threshold of significance, and a less-than-significant impact would also result associated with construction-related GHG emissions. As stated in Chapter 7, Alternatives Analysis, of the Draft EIR, the chapter focuses on the resource areas and specific impacts that have been identified in the Draft EIR as requiring mitigation to reduce significant impacts to less than significant, or have been found to remain significant and unavoidable. As the Project's construction related emissions were determined to be less than significant, the analysis provided in Chapter 7, Alternatives Analysis, of the Draft EIR, was not required to include an analysis associated with construction-related criteria pollutant or GHG emissions. In addition, please see Response to Comment 7-2.

Response to Comment 52-6
Please see Master Response 3.

Response to Comment 52-7
As further described in Chapter 4.2, Air Quality, Greenhouse Gas Emissions, and Energy, of the Draft EIR, the Project's short-term construction emissions and operational emissions were estimated using the California Emissions Estimator Model (CalEEMod). The CalEEMod modeling conducted for the Project applied project-specific data, including information such as the duration of the construction period associated with maximum development of the site, and the amount of soil import and export that is anticipated to be required for on-site construction and construction of the off-site roundabout improvements. As detailed therein, approximately 100 cubic yards (CY)

of soil would be exported during Project grading, and approximately 2,349 CY of soil would be imported during grading of the off-site roundabout improvements. In addition, Project construction was anticipated to over an approximately two-year period, and off-site roundabout improvement construction was anticipated to occur over a nine-month period. As such, the construction duration and amount of soil import and export was considered in the construction emissions analysis conducted for the Project and off-site roundabout improvements.

Response to Comment 52-8

The comment has been noted for the record and will be forwarded to the decision-makers for their consideration. Physical copies of the Draft EIR were made available for review at the City of Elk Grove offices at 8401 Laguna Palms Way and the Elk Grove Library at 8900 Elk Grove Boulevard. An electronic copy of the Draft EIR was posted on the City's website. Comments on the Draft EIR were accepted in both email and handwritten format.

Response to Comment 52-9

Please see Master Response 2 and Responses to Comments 12-8 and 12-10. Contrary to the commenter's claim that transportation impacts would be less than significant, as determined in Impact 4.11-4 within Chapter 4.11, Transportation, of the Draft EIR, VMT impacts generated by the Project would remain significant and unavoidable, even with the implementation of mitigation.

Response to Comment 52-10

Please see Response to Comment 52-6. In addition, Chapter 7, Alternatives Analysis, of the Draft EIR, includes comprehensive descriptions of each of the alternatives considered and evaluated throughout the chapter.

Response to Comment 52-11

Please see Response to Comment 24-9.

Response to Comment 52-12

It is unclear which comment letters the commenter is referring to. If the commenter is referring to the written comments received during the public comment period associated with the Notice of Preparation (NOP) prepared for the Project, such letters were included as Appendix B of the Draft EIR. If the commenter is referring to the written comments received during the public comment period associated with the Draft EIR, all such letters, as well as written responses to such letters, are included in herein.

Response to Comment 52-13

Please see Responses to Comments 9-6 and 9-7.

Response to Comment 52-14

Please see Master Response 3.

Response to Comment 52-15

Please see Response to Comment 20-1.

Response to Comment 52-16

Please see Responses to Comments 47-13 and 47-14.

Response to Comment 52-17
Please see Master Response 1 and Response to Comment 37-2.

Response to Comment 52-18
Please see Response to Comment 11-3.

Response to Comment 52-19
Please see Master Response 1.

Response to Comment 52-20
Please see Response to Comment 18-1.

Response to Comment 52-21
Please see Responses to Comments 8-2 through 8-6, and 8-10.

A discussion regarding the Project's impact on school services and/or facilities can be found in Impact 4.10-3 in Chapter 4.10, Public Services and Utilities, of the Draft EIR. As discussed therein, according to SB 50, payment of the necessary school impact fees for the Project would be considered full and satisfactory CEQA mitigation. As discussed previously, Proposition 1A/SB 50 prohibits local agencies from using the inadequacy of school facilities as a basis for denying or conditioning approvals of any "[…] legislative or adjudicative act […] involving […] the planning, use, or development of real property" (Government Code 65996[b]). The Project would be required to pay EGUSD impact fees, which are set at $0.84 per square foot (sf) for senior residential developments. Thus, the Draft EIR concluded that the Project would not result in any reasonably foreseeable substantial adverse physical impacts associated with the provision of new or physically altered governmental services and/or facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times, or performance objectives for maintenance of schools.

Response to Comment 52-22
It is unclear to what the commenter is referring to. However, a response to the comment is potentially provided in Response to Comment 29-2 above.

Response to Comment 52-23
Impacts related to transportation can be found in Chapter 4.11, Transportation, of the Draft EIR. As stated therein, the information contained within the chapter is primarily based on a Transportation Analysis Report prepared for the Project by Fehr & Peers, attached as Appendix N of the Draft EIR.

Response to Comment 52-24
Transportation impacts are listed on pages 2-88 through 2-93 of Chapter 2, Executive Summary, of the Draft EIR. Contrary to the commenter's claim that transportation impacts would be less than significant, as determined in Impact 4.11-4 within Chapter 4.11, Transportation, of the Draft EIR, VMT impacts generated by the Project would remain significant and unavoidable, even with the implementation of mitigation.

Response to Comment 52-25
Please see Master Response 1 and Response to Comment 5-11.

Response to Comment 52-26
Please see Response to Comment 5-22. In addition, potential impacts to wildlife habitat are discussed throughout Chapter 4.3, Biological Resources, of the Draft EIR. As discussed throughout Impact 4.3-1 through 4.3-11, all identified potential impacts would be reduced to less-than-significant levels with the implementation of the mitigation measures therein.

Response to Comment 52-27
Please see Responses to Comments 47-10 and 47-11. In addition, as discussed within Impact 4.7-5 of the Draft EIR, all on-site development is anticipated to avoid the 100-year floodplain limits. However, because specific development is not proposed at this time and detailed plans have not been prepared, assurance that development would not occur within the SFHA cannot be made at this time. As such, Mitigation Measure 4.7-5(b) in Chapter 4.7, Hydrology and Water Quality, of the Draft EIR, requires the Project applicant to obtain a Conditional Letter of Map Revision (CLOMR) from FEMA if any of the improvements would result in a modification to the FEMA mapped SFHA.

Response to Comment 52-28
Please see Response to Comment 11-3.

Response to Comment 52-29
The comment has been noted for the record and will be forwarded to the decision-makers for their consideration.

Response to Comment 52-30
Please see Response to Comment 9-9.

Response to Comment 52-31
Please see Responses to Comments 7-5, 7-10, 7-11, and 11-3.

Response to Comment 52-32
Please see Master Response 2, which states that the effects of the Project on traffic conditions or congestion along roadways in the Project vicinity are not considered under CEQA. In addition, as determined in Chapter 4.10, Public Services and Utilities, of the Draft EIR, Project related impacts on water and wastewater infrastructure would be less than significant.

Response to Comment 52-33
Please see Response to Comment 29-7.

Response to Comment 52-34
Please see Response to Comment 52-32.

Response to Comment 52-35
Please see Master Response 3.

Response to Comment 52-36
As discussed within Impact 4.7-5 of the Draft EIR, all on-site development is anticipated to avoid the 100-year floodplain limits. However, because specific development is not proposed at this time and detailed plans have not been prepared, assurance that development would not occur

within the SFHA cannot be made at this time. As such, Mitigation Measure 4.7-5(b) in Chapter 4.7, Hydrology and Water Quality, of the Draft EIR, requires the Project applicant to obtain a CLOMR from FEMA if any of the improvements would result in a modification to the FEMA mapped SFHA. However, it is uncertain whether a CLOMR would be required for future on-site development. Thus, including the future CLOMR required by Mitigation Measure 4.7-5(b) in the site environmental analysis now would be speculative. In addition, Mitigation Measure 4.7-4 requires preparation and submittal to the City of a design-level drainage report in conjunction with submittal of any development applications for future on-site development or any off-site roadway improvements related to the Project. Submittal of a design-level drainage report would specify the site's drainage design to ensure the future development on-site would not substantially alter the existing drainage pattern of the site or area. Finally, as required by Mitigation Measures 4.3-10(a), 4.3-10(b), and 4.3-10(c) in Chapter 4.3, Biological Resources, of the Draft EIR, the Project would be required to consult with the USACE and CDFW, if applicable, prior to the approval of any improvement plans to ensure that the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community.

Response to Comment 52-37
Please see Responses to Comments 47-10 and 47-11.

Response to Comment 52-38
The comment has been noted for the record and will be forwarded to the decision-makers for their consideration.

Response to Comment 52-39
The comment has been noted for the record and will be forwarded to the decision-makers for their consideration.

Response to Comment 52-40
Please see Master Response 3.

Response to Comment 52-41
The comment has been noted for the record and will be forwarded to the decision-makers for their consideration.

Response to Comment 52-42
The comment has been noted for the record and will be forwarded to the decision-makers for their consideration.

Response to Comment 52-43
Please see Master Response 1 and Response to Comment 8-12.

Response to Comment 52-44
The comment has been noted for the record and will be forwarded to the decision-makers for their consideration.

Response to Comment 52-45
Please see Master Response 2 and Response to Comment 31-3.

Response to Comment 52-46

Please see Responses to Comments 47-10 and 47-11.

3. Revisions to the Draft EIR Text

3. REVISIONS TO THE DRAFT EIR TEXT

3.1 INTRODUCTION

The Revisions to the Draft EIR Text chapter provides all corrections, additions, and revisions made to the Draft EIR. The changes represent minor clarifications and amplifications of the analysis contained in the Draft EIR and do not constitute significant new information that, in accordance with CEQA Guidelines Section 15088.5, would trigger the need to recirculate portions or all of the Draft EIR. Please refer to the discussion of this topic provided in Section 1.6 of Chapter 1, Introduction and List of Commenters.

3.2 DESCRIPTION OF CHANGES

New text is double underlined and deleted text is ~~struck through~~. Text changes are presented in the page order in which they appear in the Draft EIR.

2 Executive Summary

Page 2-1 in Chapter 2, Executive Summary, of the Draft EIR is hereby revised as follows:

> **Project Description**
>
> The Project would require a General Plan/Rural Area Community Plan Amendment and a corresponding amendment to the Rural Roads Policy and Rural Roads Improvement Standards, a Rezone, and would consist of the creation of a 115.9-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 4.9 acres of the site are dedicated to the Waterman Road and Sheldon Road right-of-way (ROW). The SPA does not entitle any specific development proposals. Rather, the SPA adopts site-specific zoning, development standards, and criteria for future development proposals within the site. However, given the sub-zones included in the SPA, a reasonable assumption can be made that on-site development of a senior-based housing community would occur if the SPA is approved by the City. The subsequent potential development of the 115.9-acre site includes a maximum of 499 age-restricted (55+) single-unit residences, described in further detail below.

Page 2-2 in Chapter 2, Executive Summary, of the Draft EIR is hereby revised as follows:

> **Project Determinations**
>
> The Project would require City of Elk Grove approval of the following entitlements:
>
> - Certification of the EIR, including adoption of Findings of Fact, a Statement of Overriding Considerations, and a Mitigation Monitoring and Reporting Program;
> - General Plan/Rural Area Community Plan Amendment to remove the site from the Rural Area Community Plan and modify the land use designation from RR to Low Density Residential (LDR) and Parks and Open Space (P/OS), as well as a corresponding amendment to the Rural Roads Policy and Rural Roads Improvement Standards to reflect the revised boundary of the Rural Area Community Plan;

- SPA Ordinance for the Summer Villas SPA;
- Text Amendment to the Elk Grove Municipal Code (EGMC) to add the new SPA; and
- Rezone from AR-2 to SPA.

The foregoing revisions are for clarification purposes and do not change the conclusions of the Draft EIR.

For clarification purposes, Table 2-1 in Chapter 2, Executive Summary, of the Draft EIR is hereby revised to reflect minor revisions made to Mitigation Measures 4.2-7(b), 4.3-7(a), 4.3-7(c), and 4.3-12 as part of this Final EIR, as presented throughout this chapter. Rather than include the entirety of Table 2-1 with revisions shown where appropriate, only the mitigation measures that have been revised are presented. The revisions to Table 2-1 are for clarification purposes only and do not change the conclusions of the Draft EIR. Please refer to the end of this chapter for Table 2-1.

3 Project Description

Page 3-5 in Chapter 3, Project Description, of the Draft EIR is hereby revised as follows:

General Plan/Rural Area Community Plan Amendment

The Project would require a General Plan/Rural Area Community Plan Amendment to remove the site from the Rural Area Community Plan and change the General Plan land use designation of the site from Rural Residential (RR) to Low Density Residential (LDR) and Parks and Open Space (P/OS) (see Figure 3-3), as well as a corresponding amendment to the Rural Roads Policy and Rural Roads Improvement Standards to reflect the revised boundary of the Rural Area Community Plan. The LDR land use designation provides for single 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 in order to preserve the natural features and open space resources existing within the SPA boundaries, the Project may cluster residences beyond the 7.0 du/ac density maximum consistent with General Plan Policy NR-1-9 and General Plan Goal NR-1, which allow such clustering to protect wetlands, stream corridors, scenic areas, or other natural features as open space. Although clustered development could potentially exceed the 7.0 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, as density would be determined for the entire SPA, rather than on a lot-by-lot basis. Within the SPA, a developer would be able to exercise greater flexibility in designing and placing structures, as long as the total density requirement for the SPA is not exceeded. Accordingly, the total number of units would not be allowed to exceed 499 units.

Page 3-19 in Chapter 3, Project Description, of the Draft EIR is hereby revised as follows:

Implementation of the Project would require the following discretionary actions by the City of Elk Grove:

- 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 to remove the site from the Rural Area Community Plan and modify the land use designation from RR to LDR and P/OS, as well as a corresponding amendment to the Rural

Roads Policy and Rural Roads Improvement Standards to reflect the revised boundary of the Rural Area Community Plan;

- Approval of a SPA Ordinance for the Summer Villas SPA;
- Approval of a Text Amendment to the EGMC to add the new SPA; and
- Approval of a Rezone from AR-2 to SPA.

The foregoing revisions are for clarification purposes and do not change the conclusions of the Draft EIR.

4.2 Air Quality, Greenhouse Gas Emissions, and Energy

Since circulation of the Draft EIR, the City has adopted an update to the Climate Action Plan (CAP) through preparation of the Climate Compass. In recognition of the adoption of the Climate Compass, the following is added to page 4.2-63 in Chapter 4.2, Air Quality, Greenhouse Gas Emissions, and Energy, of the Draft EIR, following Table 4.2-16. The Conclusion on the same page is also hereby revised as follows:

On June 10, 2026, the City Council adopted the Climate Compass, which is a comprehensive update to the 2019 Climate Action Plan. The Climate Compass continues to focus on reducing GHG emissions generated through communitywide or municipal actions and consistency with the 2022 Scoping Plan for achieving carbon neutrality as directed by Assembly Bill 1279 (AB 1279). Similar to the preceding CAP, the Climate Compass meets the per capita emissions targets for 2030 and 2050. In the Climate Compass, the City has targeted 2.8 $MTCO_2e$ per capita for the year 2030 and 0.5 $MTCO_2e$ per capita for the year 2050. As discussed above, the Project was determined to result in GHG emissions of 1.62 $MTCO_2e$ per capita, which is below the Climate Compass' 2030 target but above the 2050 target. The Project's emissions would also be below the CAP's 2030 target but above the 2050 target.

The Climate Compass does not include any additional mitigation at the Project level. The Project would be required to comply with all feasible mitigation measures available to reduce its GHG emissions, including the CAP measures identified in Mitigation Measure 4.2-7(b). The Project would also be required to comply with the Climate Compass and State building codes in effect at the time of permit application. The 2019 CAP and the 2026 Climate Compass are substantially similar in residential GHG emissions reductions strategies, though the 2025 California Building Code utilized by the Climate Compass related to energy efficiency is more stringent, thus resulting in a lower GHG emissions target for 2050 under the Climate Compass. Therefore, GHG emissions are anticipated to be further reduced from what is anticipated herein due to compliance with the aforementioned more stringent regulations.

Conclusion

Based on the above, in comparison to both the SMAQMD thresholds as well as compliance with the City's 2019 CAP and 2026 Climate Compass, implementation of the Project could generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, or conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG during operations. Thus, the Project could result in a ***cumulatively considerable*** incremental contribution to this significant cumulative impact.

The foregoing clarifications related to the Climate Compass do not constitute significant new information, as defined by State CEQA Guidelines Section 15088.5, nor do the revisions require recirculation of the EIR. GHG emissions were previously identified as a significant environmental

impact in the original release of the Draft EIR for the Project. In addition, the impact analysis still concludes that the Project would result in a ***cumulatively considerable*** incremental contribution to the **significant cumulative impact**. The 2019 CAP and the 2026 Climate Compass are substantially similar in residential GHG emissions reductions strategies, though the 2025 California Building Code utilized by the Climate Compass related to energy efficiency is more stringent, thus resulting in a lower GHG emissions target for 2050 under the Climate Compass. Therefore, GHG emissions are anticipated to be further reduced from what is anticipated herein due to compliance with the aforementioned more stringent regulations. The City's adoption of the Climate Compass does not result in any new or substantially different feasible mitigation that could be added to the Project. As such, the mitigation measures relating to GHG emissions will remain the same as identified in the Draft EIR.

Mitigation Measure 4.2-7(b) on page 4.2-66 within Chapter 4.2, Air Quality, Greenhouse Gas Emissions, and Energy, of the Draft EIR is hereby revised as follows:

4.2-7(b) *Prior to issuance of any grading or building permits, <u>whichever comes first,</u> Project Grading and Building Plans shall demonstrate compliance with the following applicable measures included in the City's Climate Action Plan, to the satisfaction of the City of Elk Grove Community Development Department:*

- *BE-4: The Project shall comply with ~~2019~~ CALGreen Tier 1 standards, including a 15 percent improvement over minimum Title 24, Part 6, Building Energy Efficiency Standards.*
- *BE-6: The Project shall require at least 10 percent of the proposed residential units to include exclusively electric appliances and HVAC systems.*
- *BE-7: The Project shall include rooftop solar PV panels.*
- *TACM-8: All off-road construction fleet used during construction of the Project shall include Environmental Protection Agency certified off-road Tier 4 diesel engines (or better).*

The foregoing revision is for clarification purposes and does not change the conclusions of the Draft EIR.

4.3 Biological Resources

Mitigation Measure 4.3-7(a) on pages 4.3-61 and 4.3-62 in Chapter 4.3, Biological Resources, of the Draft EIR is hereby revised as follows:

4.3-7(a) *If ground disturbance or other construction activities associated with any future Tentative Map are proposed during the bird nesting season (February 1–August 31), a focused survey for nesting raptors and migratory bird nests shall be conducted by a qualified biologist within 14 days prior to the beginning of construction activities in order to identify active nests. In addition, preconstruction (take avoidance) burrowing owl surveys of suitable habitat shall be conducted consistent with the <u>2012</u> CDFW Staff Report on Burrowing Owl Mitigation. Non-breeding season protocol shall be used for surveys conducted when construction begins between September 1 and January 31 and breeding season protocol shall be used for surveys conducted when construction begins between February 1 and August 31. The survey(s) shall be conducted within the proposed construction area and all accessible areas within the following buffer areas:*

- *0.25 mile for Swainson's hawk,*
- *500 feet for tree-nesting raptors and burrowing owls, and*
- *50 feet for all other species*

If active nests/burrows are not found, further mitigation is not required. Surveys must be repeated if a lapse in construction activity exceeds 14 days and construction resumes during the nesting season. If active nests/burrows are found the following measures shall be required:

- *Active raptor nests: Construction activities shall not take place within 0.25-mile for Swainson's hawk or within 500 feet of other raptor nest(s). The buffer(s) may be removed once a qualified biologist determines the young have fledged and/or are no longer dependent on the nest;*
- *Occupied burrowing owl burrows: A minimum buffer of 164 feet shall be established and maintained around the occupied burrow throughout construction. The actual buffer size shall be determined by the qualified biologist based on the time of year and level of disturbance in accordance with guidance provided in the CDFW Staff Report on Burrowing Owl Mitigation and may be as large as 1,640 feet. Construction activities shall not take place within the buffer, and the no-disturbance buffer shall be marked on-site. The buffer may be removed once a qualified biologist determines that the burrow is no longer occupied;*
- *Active tricolored blackbird nests: Construction activities shall not take place within 500 feet of active nesting colonies, and a no-disturbance buffer shall be marked on-site. The Project proponent shall coordinate with the City of Elk Grove Community Development Department and CDFW to identify appropriate monitoring requirements;*
- *Active nests of other birds: Construction activities shall not take place within 100 feet of an active nest, and the no-disturbance buffer shall be marked on-site. The buffer may be removed once a qualified biologist determines the young have fledged and/or are no longer dependent on the nest.*

No-disturbance buffers for all species may be reduced based on consultation and approval by the City for Swainson's hawk, burrowing owl, and tricolored blackbird. The perimeter of protected areas on-site shall be indicated by bright orange temporary fencing. Construction activities ~~or personnel shall not enter protected areas, except with approval of the biologist. If trees containing nests or nests/burrows must be removed as a result of Project implementation, removal shall be completed during the nonbreeding season (September 1 to January 31) if possible, or after a qualified biologist determines that the young have fledged (during the breeding season).~~ shall be restricted as necessary to avoid disturbance of the nest until it is abandoned or a qualified biologist deems disturbance potential to be minimal. Restrictions may include establishment of exclusion zones (no ingress of personnel or equipment at a radius of 300 feet around an active raptor nest and a 50-foot radius around an active migratory bird nest) or alteration of the construction schedule. Survey results shall be provided to the City of Elk Grove Community Development Department within 14 days of completion of all surveys.

Mitigation Measure 4.3-7(c) on pages 4.3-63 and 4.3-67 in Chapter 4.3, Biological Resources, of the Draft EIR is hereby revised as follows:

4.3-7(c) *If nesting burrowing owls are found during the preconstruction survey required by Mitigation Measure 4.3-7(a) and impacts to such burrowing owls and associated burrows will be avoided pursuant to that measure (such as when burrows are located off-site or within areas of the site not proposed for development), mitigation for the permanent loss of burrowing owl foraging habitat (defined as all areas of suitable habitat within ~~250~~ 300 feet of the active burrow) shall be accomplished at a 1:1 ratio for the portion of the habitat within the development area of the Project and at a 0.5:1 ratio for portions of the foraging habitat that lie outside of the development area of the Project (such as Open Space area or an adjacent parcel), all prior to the commencement of ground disturbance activities. ~~prior to the approval of any future Tentative Maps.~~ The mitigation provided shall be consistent with recommendations in the CDFW Staff Report on Burrowing Owl Mitigation and may be accomplished within the Swainson's hawk foraging habitat mitigation area for the Project if burrowing owls have been documented using the area, or if the qualified biologist, the City, and CDFW collectively determine that the mitigation strategy is suitable for both species.*

If nesting burrowing owls are found, during the preconstruction survey required by Mitigation Measure 4.3-7(a), that cannot be avoided or adequately protected with a no-disturbance buffer, an Incidental Take Permit (ITP) shall be obtained from CDFW in order to evict owls from the burrow(s). The ITP process shall include the preparation of an application which shall include, but not be limited to: a description of the project activity, an analysis of potential take of burrowing owl, an analysis of the impact of the proposed take on burrowing owl, an analysis of if the issuance of an ITP would jeopardize the continued existence of the species, proposed mitigation measures, and a monitoring plan to assess the effectiveness of the mitigation measures. Burrowing owls shall not be excluded from occupied burrows until the ITP is approved by CDFW.

If burrowing owls are evicted from burrows or occupied burrows are destroyed by project activities, the Project proponent shall mitigate for the permanent loss of nesting and foraging habitat (defined as all areas of suitable habitat within 300 feet of the active burrow at a ratio of 3:1. The Project proponent shall provide mitigation in the form of purchasing suitable mitigation credits from a CDFW-approved conservation bank, habitat restoration/enhancement on-site or off-site partnership with other agencies or non-profit groups on suitable restoration projects or other biologically suitable mechanisms pre-approved by CDFW.

In addition, if burrowing owls are evicted from burrows or occupied burrows are destroyed by Project activities, the Project proponent will mitigate for all temporary impacts (may include, but not limited to, temporary ground disturbance and vegetation removal before, or during construction) to burrowing owls and their habitats at a ratio of 0.5:1 to reduce project impacts to a less than significant level. The Project proponent shall provide mitigation in the form of purchasing suitable mitigation credits from a CDFW-approved conservation bank, habitat restoration/enhancement onsite or offsite, partnership with other agencies

or non-profit groups on suitable restoration projects, or other biologically suitable mechanisms pre-approved by CDFW.

In addition, a staff-initiated clarification to Mitigation Measure 4.3-12 on page 4.3-70 of the Draft EIR is hereby made as follows:

4.3-12 *Prior to ground-disturbing activities and work within the critical root zone, removal, topping, or relocation of any tree of local importance, a Tree Permit shall be obtained from the City of Elk Grove, ~~Planning Division~~ Community Development Department, and the Project applicant shall comply with all of the conditions of the permit. As part of the approval of a Tree Permit for removal of a tree, the Project applicant shall mitigate for the loss of the trees consistent with Article IV (Mitigation for Tree Loss) of EGMC Chapter 19.12. A tree mitigation plan shall be submitted to and approved by the City Arborist. Unless an alternative mitigation is approved by the City Arborist, as provided in EGMC Section 19.12.180 (Alternative mitigation requirements), the tree mitigation plan shall include the following mitigation options to ensure mitigation for the loss of protected trees is provided at a ratio of one new inch diameter at standard height (DSH) of tree for each inch DSH lost (1:1 ratio):*

- *On-Site or Off-Site Replacement. The plan shall specify where the tree(s) shall be planted and how the tree(s) shall be monitored and maintained for a minimum of five years. The City may require the establishment of a performance bond or other surety as a way to ensure that the replacement trees survive for the minimum establishment period as provided in EGMC Section 19.12.190. The City shall allow the use of on-site trees planted under a mitigation plan as a way to meet any other on-site landscaping requirement, including parking lot shading, street landscaping, and street trees on residential lots;*
- *Payment of an In-Lieu Fee as Adopted by Resolution of the City Council. The Project applicant may pay an in-lieu fee for the loss of the tree(s) at a rate established by the City Council. Such monies shall be deposited in the tree preservation fund as described in EGMC Section 19.12.220; or*
- *Credit for Existing Trees Smaller Than When a Permit Is Required. The Project applicant may be entitled to mitigation credit when species of trees that are listed in EGMC Section 19.12.040 (Trees of local importance) are preserved, but are smaller than the size threshold defined in EGMC Section 19.12.040 (i.e., less than six inches DSH). The City Arborist shall make the determination after reviewing the location of the tree(s), the quality of the environment (both pre- and post-project) in which the tree(s) is located, potential impacts to the tree(s) from proposed development, and other relevant factors that the City Arborist deems relevant to the long-term viability of the tree(s). If approved for credit, retained trees shall receive a credit of one inch DSH per tree for trees between two and five inches DSH. The City may require the establishment of a performance bond or other surety as a way to ensure that the tree(s) survive for the minimum establishment period as provided in EGMC Section 19.12.190.*

The above revisions are for clarification purposes only and do not affect the conclusions of the Draft EIR.

4.8 Land Use and Planning/Population and Housing

Page 4.8-11 in Chapter 4.8, Land Use and Planning/Population and Housing, of the Draft EIR is hereby revised as follows:

> The City of Elk Grove General Plan and EGMC carry out the policies by classifying and regulating the uses of land and structures within the City, consistent with the General Plan. As noted previously, the site is located within the northeastern portion of the City of Elk Grove. Both the Rural Area Community Plan and the City of Elk Grove General Plan designate the site as RR, and the site is zoned AR-2. As discussed above, the RR land use designation allows for a residential density between 0.1 du/ac to 0.5 du/ac, and the AR-2 zoning district implements the RR General Plan designation. Therefore, with a total proposed density of approximately 4.3 du/ac, the Project would not comply with the existing General Plan land use designation and zoning designation of the site. The Project would require approval of a General Plan/Rural Area Community Plan Amendment and a Rezone to allow for the creation of the 115.9-acre Summer Villas SPA, as well as a corresponding amendment to the Rural Roads Policy and Rural Roads Improvement Standards to reflect the revised boundary of the Rural Area Community Plan. The General Plan/Rural Area Community Plan Amendment would change the General Plan and Rural Community Plan land use designations of the site from RR to Low Density Residential (LDR) and Public/Open Space (P/OS) (see Figure 4.8-1).

The above revision is for clarification purposes only and does not affect the conclusions of the Draft EIR.

4.11 Public Services and Utilities

The wastewater conveyance and treatment section of the Draft EIR contained on page 4.10-7 is hereby revised as follows:

> SacSewer trunk sewer pipes transport the collected wastewater flows to the Regional San interceptor system. According to the City's General Plan EIR, an existing City trunk line extends southeast from the ~~Sacramento Regional Wastewater Treatment Plant (SRWTP)~~ EchoWater Resource Recovery Facility (EchoWater Facility) to Laguna Boulevard, then parallel to SR 99 along East Stockton Boulevard, extending close to the southern City boundary.
>
> ### Wastewater Treatment
>
> The ~~SRWTP~~ EchoWater Facility is located on 900 acres of a 3,550-acre site between I-5 and Franklin Boulevard, north of Laguna Boulevard. The remaining 2,650 acres serve as a buffer between the ~~SRWTP~~ EchoWater Facility and nearby residential areas. Wastewater is treated by accelerated physical and natural biological processes before being discharged to the Sacramento River.
>
> As discussed in the City's General Plan EIR, ~~The~~ the SRWTP 2020 Master Plan provides a phased program of recommended wastewater treatment facilities and management programs to accommodate planned growth and to meet existing and anticipated regulatory requirements in the SacSewer service area.[1] The Master Plan uses SACOG population

[1] ~~Sacramento Area Sewer District. *System Capacity Plan 2020 Update*. December 2020.~~ City of Elk Grove. *General Plan Update Draft Environmental Impact Report* [pg. 5.12-27]. February 2019.

projections multiplied by per capita flow and load values to determine future facility needs. The ~~SRWTP's~~ EchoWater Facility's capacity is currently limited to an equivalent 207 million gallons per day (mgd) average dry weather flow (ADWF) and the ~~SRWTP~~ EchoWater Facility has been planned to accommodate up to 350 mgd ADWF. In addition, SacSewer has prepared a long-range master plan for the large-diameter interceptors that transport wastewater to the ~~SRWTP~~ EchoWater Facility, including interceptor upgrades/expansions to accommodate anticipated growth through 2035.

References to the Sacramento Regional Wastewater Treatment Plant (SRWTP) are made in several locations throughout the Draft EIR, including throughout Chapter 4.10 and within Chapter 6. The revision presented above is hereby applied to all such similar discussions throughout the Draft EIR. The above revisions are for clarification purposes only and would not affect the analysis or conclusions of the Draft EIR.

4.11 Transportation

Pages 4.11-17 and 4.11-18 in Chapter 4.11, Transportation, of the Draft EIR are hereby revised as follows:

Project Trip Generation

The trip generation for the Project was calculated using trip generation rates published in the Institute of Transportation Engineers 11th Edition Trip Generation Manual. The applicable rate for the proposed land use is category 251 (Senior Adult Housing – Single-Family). Application of the foregoing trip generation rates to the 499 age-restricted single-unit residences yields a total of ~~1,944~~ 2,151 daily trips with ~~108~~ 120 trips generated in the AM peak hour and ~~135~~ 150 trips generated during the PM peak hour. Table 4.11-5 summarizes the trip generation associated with the Project.

Table 4.11-5
Project Trip Generation

Land Use	ITE Code	Time	Trip Rate	Percent In	Percent Out	Total Trips	Ins	Outs
Senior Adult Housing – Detached	251	Daily	4.31	50	50	~~1,944~~ 2,151	~~972~~ 1,075	~~972~~ 1,076
		AM Peak Hour	0.24	33	67	~~108~~ 120	~~36~~ 40	~~72~~ 80
		PM Peak Hour	0.3	61	39	~~135~~ 150	~~82~~ 91	~~53~~ 59

Source: Fehr & Peers, 2025.

The above revisions are consistent with the analysis included in the Transportation Analysis Report prepared for the Project by Fehr & Peers attached as Appendix N of the Draft EIR) on which the analysis within the Transportation chapter is based. Because the analysis and conclusions presented in the Transportation chapter of the EIR are based on the Transportation Analysis Report, the above revisions are for consistency and clarification purposes only and do not change the conclusions of the Transportation Analysis Report or Draft EIR.

Table 2-1
Summary of Impacts and Mitigation Measures

	Impact	Level of Significance Prior to Mitigation		Mitigation Measures	Level of Significance After Mitigation
4.2 Air Quality., Greenhouse Gas Emissions, and Energy					
4.2-7	Generation of GHG emissions that may have a significant impact on the environment or conflict with an applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.	S	*4.2-7(b)*	*Prior to issuance of any grading or building permits, <u>whichever comes first,</u> Project Grading and Building Plans shall demonstrate compliance with the following applicable measures included in the City's Climate Action Plan, to the satisfaction of the City of Elk Grove Community Development Department:* • *BE-4: The Project shall comply with ~~2019~~ CALGreen Tier 1 standards, including a 15 percent improvement over minimum Title 24, Part 6, Building Energy Efficiency Standards.* • *BE-6: The Project shall require at least 10 percent of the proposed residential units to include exclusively electric appliances and HVAC systems.* • *BE-7: The Project shall include rooftop solar PV panels.* • *TACM-8: All off-road construction fleet used during construction of the Project shall include Environmental Protection Agency certified off-road Tier 4 diesel engines (or better).*	CC, SU
4.3 Biological Resources					
4.3-7	Have a substantial adverse effect, either directly or through habitat modifications, on nesting birds and raptors protected under the MBTA and CFGC.	S	*4.3-7(a)*	*If ground disturbance or other construction activities associated with any future Tentative Map are proposed during the bird nesting season (February 1–August 31), a focused survey for nesting raptors and migratory bird nests shall be conducted by a qualified biologist within 14 days prior to the beginning of construction activities in order to identify active nests. In addition, preconstruction (take avoidance) burrowing owl surveys of suitable habitat*	LS

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		shall be conducted consistent with the 2012 CDFW Staff Report on Burrowing Owl Mitigation. Non-breeding season protocol shall be used for surveys conducted when construction begins between September 1 and January 31 and breeding season protocol shall be used for surveys conducted when construction begins between February 1 and August 31. The survey(s) shall be conducted within the proposed construction area and all accessible areas within the following buffer areas: • *0.25 mile for Swainson's hawk,* • *500 feet for tree-nesting raptors and burrowing owls, and* • *50 feet for all other species* *If active nests/burrows are not found, further mitigation is not required. Surveys must be repeated if a lapse in construction activity exceeds 14 days and construction resumes during the nesting season. If active nests/burrows are found the following measures shall be required:* • *Active raptor nests: Construction activities shall not take place within 0.25-mile for Swainson's hawk or within 500 feet of other raptor nest(s). The buffer(s) may be removed once a qualified biologist determines the young have fledged and/or are no longer dependent on the nest;* • *Occupied burrowing owl burrows: A minimum buffer of 164 feet shall be established and*	

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		maintained around the occupied burrow throughout construction. The actual buffer size shall be determined by the qualified biologist based on the time of year and level of disturbance in accordance with guidance provided in the CDFW Staff Report on Burrowing Owl Mitigation and may be as large as 1,640 feet. Construction activities shall not take place within the buffer, and the no-disturbance buffer shall be marked on-site. The buffer may be removed once a qualified biologist determines that the burrow is no longer occupied; • *Active tricolored blackbird nests: Construction activities shall not take place within 500 feet of active nesting colonies, and a no-disturbance buffer shall be marked on-site. The Project proponent shall coordinate with the City of Elk Grove Community Development Department and CDFW to identify appropriate monitoring requirements;* • *Active nests of other birds: Construction activities shall not take place within 100 feet of an active nest, and the no-disturbance buffer shall be marked on-site. The buffer may be removed once a qualified biologist determines the young have fledged and/or are no longer dependent on the nest.* *No-disturbance buffers for all species may be reduced based on consultation and approval by the City for Swainson's hawk, burrowing owl, and*	

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		tricolored blackbird. The perimeter of protected areas on-site shall be indicated by bright orange temporary fencing. Construction activities ~~or personnel shall not enter protected areas, except with approval of the biologist. If trees containing nests or nests/burrows must be removed as a result of Project implementation, removal shall be completed during the nonbreeding season (September 1 to January 31) if possible, or after a qualified biologist determines that the young have fledged (during the breeding season).~~ shall be restricted as necessary to avoid disturbance of the nest until it is abandoned or a qualified biologist deems disturbance potential to be minimal. Restrictions may include establishment of exclusion zones (no ingress of personnel or equipment at a radius of 300 feet around an active raptor nest and a 50-foot radius around an active migratory bird nest) or alteration of the construction schedule. Survey results shall be provided to the City of Elk Grove Community Development Department within 14 days of completion of all surveys. *4.3-7(c) If nesting burrowing owls are found during the preconstruction survey required by Mitigation Measure 4.3-7(a) and impacts to such burrowing owls and associated burrows will be avoided pursuant to that measure (such as when burrows are located off-site or within areas of the site not proposed for development), mitigation for the permanent loss of burrowing owl foraging habitat (defined as all areas of suitable habitat within ~~250~~ 300*	

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		feet of the active burrow) shall be accomplished at a 1:1 ratio for the portion of the habitat within the development area of the Project and at a 0.5:1 ratio for portions of the foraging habitat that lie outside of the development area of the Project (such as Open Space area or an adjacent parcel), all prior to the commencement of ground disturbance activities. ~~prior to the approval of any future Tentative Maps.~~ The mitigation provided shall be consistent with recommendations in the CDFW Staff Report on Burrowing Owl Mitigation and may be accomplished within the Swainson's hawk foraging habitat mitigation area for the Project if burrowing owls have been documented using the area, or if the qualified biologist, the City, and CDFW collectively determine that the mitigation strategy is suitable for both species. *If nesting burrowing owls are found, during the preconstruction survey required by Mitigation Measure 4.3-7(a), that cannot be avoided or adequately protected with a no-disturbance buffer, an Incidental Take Permit (ITP) shall be obtained from CDFW in order to evict owls from the burrow(s). The ITP process shall include the preparation of an application which shall include, but not be limited to: a description of the project activity, an analysis of potential take of burrowing owl, an analysis of the impact of the proposed take on burrowing owl, an analysis of if the issuance of an ITP would jeopardize the continued existence of the species, proposed mitigation measures, and a monitoring plan to assess*	

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		the effectiveness of the mitigation measures. Burrowing owls shall not be excluded from occupied burrows until the ITP is approved by CDFW. *If burrowing owls are evicted from burrows or occupied burrows are destroyed by project activities, the Project proponent shall mitigate for the permanent loss of nesting and foraging habitat (defined as all areas of suitable habitat within 300 feet of the active burrow at a ratio of 3:1. The Project proponent shall provide mitigation in the form of purchasing suitable mitigation credits from a CDFW-approved conservation bank, habitat restoration/enhancement on-site or off-site partnership with other agencies or non-profit groups on suitable restoration projects or other biologically suitable mechanisms pre-approved by CDFW.* *In addition, if burrowing owls are evicted from burrows or occupied burrows are destroyed by Project activities, the Project proponent will mitigate for all temporary impacts (may include, but not limited to, temporary ground disturbance and vegetation removal before, or during construction) to burrowing owls and their habitats at a ratio of 0.5:1 to reduce project impacts to a less than significant level. The Project proponent shall provide mitigation in the form of purchasing suitable mitigation credits from a CDFW-approved conservation bank, habitat restoration/enhancement onsite or offsite, partnership with other agencies or non-profit groups on suitable*	

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		restoration projects, or other biologically suitable mechanisms pre-approved by CDFW.	
4.3-12 Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, or have a substantial adverse effect on the environment by converting oak woodlands or impacting individual trees.	S	*4.3-12* *Prior to ground-disturbing activities and work within the critical root zone, removal, topping, or relocation of any tree of local importance, a Tree Permit shall be obtained from the City of Elk Grove, ~~Planning Division~~ Community Development Department, and the Project applicant shall comply with all of the conditions of the permit. As part of the approval of a Tree Permit for removal of a tree, the Project applicant shall mitigate for the loss of the trees consistent with Article IV (Mitigation for Tree Loss) of EGMC Chapter 19.12. A tree mitigation plan shall be submitted to and approved by the City Arborist. Unless an alternative mitigation is approved by the City Arborist, as provided in EGMC Section 19.12.180 (Alternative mitigation requirements), the tree mitigation plan shall include the following mitigation options to ensure mitigation for the loss of protected trees is provided at a ratio of one new inch diameter at standard height (DSH) of tree for each inch DSH lost (1:1 ratio):* • *On-Site or Off-Site Replacement. The plan shall specify where the tree(s) shall be planted and how the tree(s) shall be monitored and maintained for a minimum of five years. The City may require the establishment of a performance bond or other surety as a way to ensure that the replacement trees survive for the minimum establishment period as provided in EGMC Section 19.12.190. The City shall allow the*	LS

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		use of on-site trees planted under a mitigation plan as a way to meet any other on-site landscaping requirement, including parking lot shading, street landscaping, and street trees on residential lots; • *Payment of an In-Lieu Fee as Adopted by Resolution of the City Council. The Project applicant may pay an in-lieu fee for the loss of the tree(s) at a rate established by the City Council. Such monies shall be deposited in the tree preservation fund as described in EGMC Section 19.12.220; or* • *Credit for Existing Trees Smaller Than When a Permit Is Required. The Project applicant may be entitled to mitigation credit when species of trees that are listed in EGMC Section 19.12.040 (Trees of local importance) are preserved, but are smaller than the size threshold defined in EGMC Section 19.12.040 (i.e., less than six inches DSH). The City Arborist shall make the determination after reviewing the location of the tree(s), the quality of the environment (both pre- and post-project) in which the tree(s) is located, potential impacts to the tree(s) from proposed development, and other relevant factors that the City Arborist deems relevant to the long-term viability of the tree(s). If approved for credit, retained trees shall receive a credit of one inch DSH per tree for trees between two and five inches DSH. The City may require the*	

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		establishment of a performance bond or other surety as a way to ensure that the tree(s) survive for the minimum establishment period as provided in EGMC Section 19.12.190.	

4. Mitigation Monitoring and Reporting Program

4. MITIGATION MONITORING AND REPORTING PROGRAM

4.1 INTRODUCTION

Section 15097 of the California Environmental Quality Act (CEQA) requires all State and local agencies to establish monitoring or reporting programs for projects approved by a public agency whenever approval involves the adoption of either a "mitigated negative declaration" or specified environmental findings related to environmental impact reports.

The following is the Mitigation Monitoring and Reporting Program (MMRP) for the Summer Villas Special Planning Area Project (Project). The intent of the MMRP is to ensure implementation of the mitigation measures identified within the Environmental Impact Report (EIR) for the Project. Unless otherwise noted, the cost of implementing the mitigation measures as prescribed by this MMRP shall be funded by the applicant.

4.2 COMPLIANCE CHECKLIST

The MMRP contained herein is intended to satisfy the requirements of CEQA as they relate to the EIR prepared for the Project. This MMRP is intended to be used by City staff and mitigation monitoring personnel to ensure compliance with mitigation measures during project implementation. Mitigation measures identified in this MMRP were developed in the EIR.

The EIR presents a detailed set of mitigation measures that will be implemented throughout the lifetime of the project. Mitigation is defined by CEQA Guidelines, Section 15370, as a measure that:

- Avoids the impact altogether by not taking a certain action or parts of an action;
- Minimizes impacts by limiting the degree or magnitude of the action and its implementation;
- Rectifies the impact by repairing, rehabilitating, or restoring the impacted environment;
- Reduces or eliminates the impact over time by preservation and maintenance operations during the life of the project; or
- Compensates for the impact by replacing or providing substitute resources or environments.

The intent of the MMRP is to ensure the implementation of adopted mitigation measures. The MMRP will provide for monitoring of construction activities as necessary and in-the-field identification and resolution of environmental concerns.

Monitoring and documenting the implementation of mitigation measures will be coordinated by the City of Elk Grove. The table attached to this report identifies the mitigation measures, the monitoring action for each mitigation measure, the responsible party for the monitoring action, and timing of the monitoring action. The applicant will be responsible for fully understanding and effectively implementing the mitigation measures contained within the MMRP. The City will be responsible for monitoring compliance.

4.3 MITIGATION MONITORING AND REPORTING PROGRAM

The following table indicates the mitigation measure number, the impact the measure is designed to address, the measure text, the monitoring agency, implementation schedule, and an area for sign-off indicating compliance.

MITIGATION MONITORING AND REPORTING PROGRAM Summer Villas Special Planning Area Project						
Impact Number	**Impact**	**Mitigation Measures**		**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
Chapter 4.1 - Aesthetics						
4.1-3	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.	*4.1-3*	*In conjunction with submittal of the first tentative subdivision map for the Project, the developer shall submit a lighting plan and photometric plan for review and approval by the City of Elk Grove Community Development Department. The lighting and photometric plans shall address limiting light trespass and glare on the site to 0.1 footcandle through the use of shielding and directional lighting methods, which may include, but is not limited to, fixture location and height. The lighting and photometric plans shall comply with Elk Grove Municipal Code (EGMC) Chapter 23.56 and the applicable standards of the Summer Villas SPA.*	City of Elk Grove Community Development Department	In conjunction with submittal of the first tentative subdivision map	
4.1-5	Creation of new sources of light or glare associated with cumulative development of the Project in combination with future buildout of the City of Elk Grove.	*4.1-5*	*Implement Mitigation Measure 4.1-3.*	See Mitigation Measure 4.1-3	See Mitigation Measure 4.1-3	
Chapter 4.2 - Air Quality, Greenhouse Gas Emissions, and Energy						
4.2-7	Generation of GHG emissions that may have a significant impact on the environment or conflict with an applicable plan, policy or regulation of an agency	*4.2-7(a)*	*The following requirements shall be noted on Project improvement plans, subject to review and approval by the City of Elk Grove Community Development Department:* • *The project shall be constructed to include electric vehicle (EV) ready*	City of Elk Grove Community Development Department	Prior to approval of Project improvement plans	

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	adopted for the purpose of reducing the emissions of GHGs.	*parking spaces at the ratio with which the current CalGreen Tier 2 standards require EV Capable spaces; and* • *The Project shall either (i) be designed such that the project is built all-electric, and natural gas infrastructure shall be prohibited on-site; or (ii) be designed to include pre-wiring to allow for the future retrofit of all natural gas appliances with all-electric appliances and the Applicant shall purchase off-site mitigation credits or forecasted mitigation units ("FMUs") (collectively, "GHG credits") for project-related GHG emissions from the component(s) using natural gas instead of electric, as set forth in further detail below.* *The emissions from any use of natural gas shall be calculated by a qualified professional utilizing SMAQMD-, CARB-, or the USEPA-approved emissions models and quantification methods available and submitted to the City for review and approval, which shall include third-party review by a qualified consultant of the City's selection and be subject to applicant reimbursement of consultant costs.*			

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Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		Any and all GHG credits to offset for the use of natural gas must be created through a CARB-approved registry. These registries are currently the ACR, CAR, and Verra, although CARB may accredit additional registries in the future. These registries use robust accounting protocols for all GHG credits created for their exchange, including the six currently approved CARB protocols. This mitigation measure specifically requires GHG credits created for the project originate from a CARB-approved protocol or a protocol that is equal to or more rigorous than CARB requirements under 17 CCR 95972. The selected protocol must demonstrate that the GHG-emissions reductions are real, permanent, quantifiable, verifiable, enforceable, and additional. Definitions of these terms from 17 CCR 95802(a) are provided below. *(1) Real: GHG reductions or enhancements result from a demonstrable action or set of actions and are quantified using appropriate, accurate, and conservative methodologies that account for all GHG emissions sources, GHG sinks, and GHG reservoirs within the [GHG credit] project boundary and account for uncertainty and the potential for activity-shifting and market-shifting leakage.*			

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		(2) Additional: GHG reductions or removals that exceed any GHG reduction, or removals otherwise required by law, regulation, or legally binding mandate, and that exceed any GHG reductions or removals that would otherwise occur in a conservative BAU scenario. *(3) Permanent: GHG reductions and removal enhancements are not reversible or, when GHG reductions and GHG-removal enhancements may be reversible, mechanisms are in place to replace any reversed GHG-emission reductions and GHG-removal enhancements to ensure that all credited reductions endure for at least 100 years.* *(4) Quantifiable: The ability to accurately measure and calculate GHG reductions or GHG-removal enhancements relative to a project baseline in a reliable and replicable manner for all GHG emission sources, GHG sinks, or GHG reservoirs included within the [GHG credit] project boundary, while accounting for uncertainty. activity-shifting, and market-shifting leakage.* *(5) Verifiable: A [GHG credit] project report assertion is well-*			

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		documented and transparent such that it lends itself to an objective review by an accredited verification body. *(6) Enforceable: The authority for CARB to hold a particular party liable and take appropriate action if any of the provisions of this article are violated. Note that this definition of enforceability is specific to the Cap-and-Trade regulation, where CARB holds enforcement authority, but this measure will employ GHG credits from the voluntary market, where CARB has no enforcement authority. Applying the definition to this mitigation measure means that GHG reductions must be owned by a single entity and backed by a legal instrument or contract that defines exclusive ownership.* ***Geographic Prioritization of GHG Credits*** *GHG credits from reduction projects in the City will be prioritized before projects in larger geographies (i.e., northern California, California, United States, and international). The applicant will inform brokers of the required geographic prioritization for the procurement of GHG credits. GHG credits from reduction projects identified in the City that are of equal or lesser cost compared to the settlement price of the latest Cap-and-Trade auction must be included in the*			

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		transaction. GHG credits from reduction projects outside of the City may be purchased if adequate credits cannot be found in the City or if they exceed the maximum price identified above. The economic and geographic analysis undertaken to inform the selection of GHG credits must be provided by the applicant to the City as part of the required documentation discussed below under Plan Implementation and Reporting. ***Types of GHG Credits*** *GHG credits may be in the form of GHG offsets for prior reductions of GHG emissions verified through protocols or FMUs for future committed GHG emissions meeting protocols. Because emissions reductions from GHG offsets have already occurred, their benefits are immediate and can be used to compensate for an equivalent quantity of project-generated emissions at any time. GHG credits from FMUs must be funded and implemented within 5 years of project GHG emissions to qualify as a GHG credit under this measure (i.e., there can only be a maximum of 5 years lag between project emissions and their real-world reductions through funding a FMU in advance and implementing the FMU on the ground). Any use of FMUs that result in a time lag between project emissions and their reduction by GHG credits from FMUs must be compensated through a prorated*			

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		surcharge of additional FMUs proportional to the effect of the delay. Because emissions of CO2 in the atmosphere reach their peak radiative forcing within 10 years, a surcharge of 10 percent for every year of lag between project emissions and their reduction through a FMU will be added to the GHG credit requirement (i.e., 1.10 FMUs would be required to mitigate 1 metric ton of project GHG emissions generated in the year prior to funding and implementation of the FMU). ***Verification and Independent Review of GHG Credits*** *All GHG credits will be verified by an independent verifier accredited by the ANSI National Accreditation Board (ANAB) or CARB, or an expert with equivalent qualifications to the extent necessary to assist with the verification. Following the standards and requirements established by the accreditation board (i.e., ANAB or CARB), the verifier will certify the following.* • *GHG credits conform to a CARB-approved protocol or a protocol that is equal to or more rigorous than CARB requirements under 17 CCR 95972. Verification of the latter requires certification that the credits meet or exceed the standards in 17 CCR 95972.* • *GHG credits are real, permanent, quantifiable, verifiable,*			

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		enforceable, and additional, as defined in this measure. • *GHG credits are purchased according to the geographic prioritization standard defined in this measure under Geographic Prioritization of GHG Credits.* *Verification of GHG offsets must occur as part of the certification process for compliance with the accounting protocol. Because FMUs are GHG credits that will result from future projects, additional verification must occur beyond initial certification is required. Verification for FMUs must include initial certification and independent verification every 5 years over the duration of the FMU generating the GHG credits. The verification will examine both the GHG credit realization on the ground and its progress toward delivering future GHG credits. The applicant will retain an independent verifier meeting the qualifications described above to certify reductions achieved by FMUs are achieved following completion of the future reduction project.*			
		4.2-7(b) *Prior to issuance of any grading or building permits, whichever comes first, Project Grading and Building Plans shall demonstrate compliance with the following applicable measures included in the City's Climate Action Plan, to the satisfaction of the*	City of Elk Grove Community Development Department	Prior to issuance of any grading or building permits	

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			City of Elk Grove Community Development Department: • *BE-4: The Project shall comply with CALGreen Tier 1 standards, including a 15 percent improvement over minimum Title 24, Part 6, Building Energy Efficiency Standards.* • *BE-6: The Project shall require at least 10 percent of the proposed residential units to include exclusively electric appliances and HVAC systems.* • *BE-7: The Project shall include rooftop solar PV panels.* • *TACM-8: All off-road construction fleet used during construction of the Project shall include Environmental Protection Agency certified off-road Tier 4 diesel engines (or better).*			
		4.2-7(c)	*Implement Mitigation Measures 4.11-4.*	See Mitigation Measure 4.11-4	See Mitigation Measure 4.11-4	
Chapter 4.3 – Biological Resources						
		4.3-1(a)	*Prior to approval of any improvement plans, a special-status plant survey shall be conducted at the time of year when special-status/rare plant species are both evident and identifiable. The survey shall be conducted by a qualified botanist for all areas of suitable habitat for special-status*	City of Elk Grove Community Development Department	Prior to approval of any improvement plans	

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		plants within the final development footprint not surveyed during the 2024 protocol special-status plant survey. If construction in areas surveyed in 2024 does not commence prior to July 1 of 2027, another round of special-status plant surveys shall be conducted in areas proposed for impact prior to commencement of construction. The survey(s) shall be conducted in accordance with the U.S. Fish and Wildlife Service (USFWS) Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed, Proposed, and Candidate Plants, the California Native Plant Society (CNPS) Botanical Survey Guidelines of the California Native Plant Society, and California Department of Fish and Wildlife (CDFW) Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities. The results of the survey(s) shall be submitted to the City of Elk Grove Community Development Department prior to the commencement of construction activities. *If special-status/rare plant species are not identified during the survey(s), further mitigation is not necessary. If special-status/rare plant species are identified, an "Avoidance Zone" shall be established. If a federal Endangered Species Act (FESA) or California Endangered Species Act (CESA) listed special-status plant is found, then the appropriate Avoidance Zone shall be*			

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		developed in consultation with USFWS or CDFW (as applicable). If the species is not listed under FESA or CESA, the appropriate Avoidance Zone shall be developed by a qualified botanist in consultation with the City. Avoidance Zone areas may differ by species and site-specific conditions, and shall be developed such that the avoided special- status plant population is likely to persist in perpetuity. Avoidance Zones may be based on a fixed buffer distance from the special-status plant population, at the limit of a hydrologic break, or as otherwise determined appropriate for the species in question. A 100-foot buffer is an appropriate Avoidance Zone for legenere. The 100-foot buffer could be reduced if a hydrologic break exists between the plants and proposed development such that the development would not impact hydrology for the plants. In addition to the Avoidance Zone, the Project shall be designed such that unseasonal or landscaping water is not directed into the wetland, and residential backyards are not located along the edge of the Avoidance Zone. *If any special-status plants cannot be avoided and grading or other disturbance would occur within mapped population areas, including the mapped populations of legenere within the study area, the Project proponent shall develop a Special-Status Plant Mitigation Plan for review and*			

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		approval by the City of Elk Grove Community Development Department prior to issuance of a grading permit that would impact the plants. The Special-Status Plant Mitigation Plan shall include the following mitigation options: *1. <u>Preservation</u>: Identify existing, unprotected populations of the special-status plant that would be impacted by the Project in the Project vicinity and protect the population in perpetuity by establishing a preserve on other land that supports those populations. Once the proposed mitigation area is approved by the City of Elk Grove Community Development Department, the mitigation area shall be protected by a recorded conservation easement or deed restriction and managed in accordance with a long-term management plan that maintains the habitats the conservation easement was established to protect (including the special-status plants). Additionally, a preserve management endowment shall be established to fund the long-term management outlined in the long-term management plan, or sufficient annual management funding shall be a condition of a Homeowner's Association, Community Services District, or other alternative as approved by the City. As the*			

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		preservation mitigation option would preserve an existing, established population, temporal loss would not occur, and a low risk of failure would occur. As a result, the required mitigation ratio for the preservation option would be 1:1. The 1:1 ratio may be based on the acreage of occupied habitat or number of plants; the ratio shall be clearly defined in the Special-Status Plant Mitigation Plan. Alternatively, the preservation option may be implemented at a mitigation/conservation bank if the target plant species is present at the bank, and the Special-Status Plant Mitigation Plan shall describe how the purchase of bank credits translates into appropriate 1:1 preservation. 2. *Relocation or Translocation: Mitigate impacts by establishment of a new special-status plant population or expansion of an existing special-status plant population. The proposed mitigation area may be on-site or off-site and shall be permanently protected by the recordation of a conservation easement or deed restriction, development of a long-term management plan that maintains the habitats that the conservation easement was established to protect, and include the establishment of a preserve management endowment, or*			

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		sufficient annual management funding shall be a condition of a Homeowner's Association, Community Services District, or other alternative as approved by the City of Elk Grove Community Development Department or regulating agency. The Project proponent shall locate and protect the mitigation area(s), translocate seeds or relocate perennial plants to the mitigation area(s), monitor the translocated/relocated seeds/plants for a minimum of five years, and meet established success criteria as detailed in the Special-Status Plant Mitigation Plan. The minimum success criterion for the relocation or translocation option would be 2:1 replacement of directly impacted plants and 1:1 replacement for indirectly impacted plants by year five of monitoring. The 2:1 ratio may be based on the acreage of occupied habitat or number of plants; the ratio shall be clearly defined in the Special-Status Plant Mitigation Plan. If the success criteria are not met, then additional habitat shall be set aside as set forth under Option 1 or as agreed upon by the City as appropriate. Because population sizes for annual plants can vary widely from year to year, for Option 2, population counts or acreage mapping shall be conducted in the last two years of monitoring, and the			

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		highest count or acreage shall be at least equivalent to the number of required replacement plants. 3. *Avoidance and Monitoring: Work shall only be allowed within the Avoidance Zone if the Project proponent elects to hire a qualified biologist, as approved by the City, to determine that such work within the Avoidance Zone would not indirectly impact the plant population and then to monitor the potentially indirectly impacted plant population for five years to document the lack of impact. The allowable types of construction activities and the allowable length, width, and timing of encroachment into the Avoidance Zone shall be determined by the qualified biologist. The Project proponent shall prepare a monitoring plan submitted to the applicable agency (City, CDFW, and/or USFWS), as determined by the qualified biologist, for approval prior to grading permit issuance, and that shall include monitoring methodology, success criteria (i.e., what conditions will demonstrate the lack of impact), considerations for drought years and adjacent land uses, and reporting. If at the end of the monitoring period, the population is determined to have substantially decreased, the plants shall be mitigated as outlined in Options 1 or 2 above at a ratio of 1:1.*			

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		4.3-1(b) *Prior to any ground-disturbing or vegetation-removal activities, a Worker Environmental Awareness Training (WEAT) shall be prepared and administered to the construction crews. The WEAT shall address the FESA and CESA; the Clean Water Act and/or Porter-Cologne Act; the Project's permits and CEQA documentation and associated mitigation measures; consequences and penalties for violation or noncompliance with applicable laws and regulations; identification of special-status wildlife; location of any avoided resources; hazardous substance spill prevention and containment measures; and the contact person in the event of the discovery of a special-status species. The WEAT shall also discuss the different habitats used by the species' different life stages and the annual timing of the life stages. A handout summarizing the WEAT information shall be provided to workers to keep on-site for future reference. Upon completion of the WEAT training, workers shall sign a form to be submitted to the City of Elk Grove Community Development Department stating that they attended the training, understand the information presented and will comply with the regulations discussed. Workers shall be shown designated avoidance areas during the WEAT training; worker access shall be restricted to outside of such areas to minimize the potential for*	City of Elk Grove Community Development Department	Prior to any ground disturbing or vegetation-removal activities	

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			inadvertent environmental impacts. Fencing and signage around the boundary of avoidance areas shall be noted on Improvement Plans.			
4.3-2	Have a substantial adverse effect, either directly or through habitat modifications, on Crotch's bumble bee.	*4.3-2*	*The provisions contained herein only apply if Crotch's bumble bee remains a candidate species or is listed under CESA at the commencement of construction. Following CDFW's status report on Crotch's bumble bee, if the California Fish and Game Commission finds that the petitioned action is not warranted, the provisions contained herein shall not be required.* *Initial ground-disturbing activities associated with development of any future Tentative Map (e.g., grading, vegetation removal, staging) should take place between September 1 and March 31 (i.e., outside the colony active period) to avoid potential impacts on special-status bumble bees. If initial ground-disturbing activities does not occur between September 1 and March 31, then at a maximum of 14 days prior to the commencement of construction activities, a qualified biologist shall conduct a preconstruction survey for Crotch's bumble bees in the area(s) proposed for impact.* *The survey shall occur during the period from one hour after sunrise to two hours before sunset, with temperatures between 65 degrees Fahrenheit and 90 degrees Fahrenheit, with low wind and zero rain. If*	City of Elk Grove Community Development Department California Department of Fish and Wildlife (CDFW)	At a maximum of 14 days prior to the commencement of construction activities, if Crotch's bumble bee remains a candidate species or is listed under CESA at the commencement of construction	

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		the timing of the start of construction makes the survey infeasible due to the temperature requirements, the surveying biologist shall select the most appropriate days based on the National Weather Service seven-day forecast and shall survey at a time of day that is closest to the temperature range stated above. The survey duration shall be commensurate with the physical extent of suitable floral resources (which represent foraging habitat) present within the area proposed for impact, and the level of effort shall be based on the metric of a minimum of one person-hour of searching per three acres of suitable floral resources/foraging habitat. A meandering pedestrian survey shall be conducted throughout the area proposed for impact in order to identify patches of suitable floral resources. *Suitable floral resources for Crotch's bumble bee include species in the following families: Apocynaceae, Asteraceae, Boraginaceae, Fabaceae, and Lamiaceae. Suitable floral resources for western bumble bee include species in the following families: Asteraceae, Fabaceae, Rhamnaceae, and Rosaceae, as well as plants in the genera Eriogonum and Penstemon.* *At a minimum, preconstruction survey methods shall include the following:*			

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		• *Search areas with floral resources for foraging bumble bees. Observed foraging activity may indicate a nest is nearby, and therefore, the survey duration shall be increased when foraging bumble bees are present;* • *If Crotch's bumble bees are observed, watch any Crotch's bumble bees present and observe their flight patterns. Attempt to track their movements between foraging areas and the nest;* • *Visually look for nest entrances. Observe burrows, any other underground cavities, logs, or other possible nesting habitat;* • *If floral resources or other vegetation preclude observance of the nest, small areas of vegetation may be removed via hand removal, line trimming, or mowing to a height of a minimum of four inches to assist with locating the nest;* • *Look for concentrated Crotch's bumble bee activity;* • *Listen for the humming of a nest colony; and* • *If bumble bees are observed, attempt to photograph the individual and identify it to species.* *The biologist conducting the survey shall record when the survey was conducted, a*			

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		general description of any suitable foraging habitat/floral resources present, a description of observed bumble bee activity, a list of bumble bee species observed, a description of any vegetation removed to facilitate the survey, and their determination of if survey observations suggest a Crotch's bumble bee nest(s) may be present or if construction activities could result in take of Crotch's bumble bees. The report shall be submitted to the City of Elk Grove Community Development Department prior to the commencement of construction activities. *If bumble bees are not located during the preconstruction survey or the bumble bees located are definitively identified as a common species (i.e., not special-status species), then further mitigation or coordination with the California Department of Fish and Wildlife (CDFW) is not required.* *If any sign(s) of a bumble bee nest is observed, and if the species present cannot be established as a common bumble bee, then construction shall not commence until either (1) the bumble bees present are positively identified as common (i.e., not a special-status species), or (2) the completion of coordination with CDFW to identify appropriate mitigation measures, which may include, but not be limited to, waiting until the colony active season ends,*			

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		establishment of nest buffers, or obtaining an Incidental Take Permit (ITP) from CDFW. *If Crotch's bumble bees are located, and, after coordination with CDFW, take of Crotch's bumble bees cannot be avoided, the Project applicant shall obtain an ITP from CDFW, and the applicant shall implement all conditions identified in the ITP.* *Consistent with Fish and Game Code Section 2081, mitigation required by any ITP obtained from CDFW shall minimize and fully mitigate any impacts of the authorized take, be roughly proportional in extent to the impact of the take, be capable of successful implementation, and, where various alternative measures are available, maintain the applicant's objectives to the greatest extent possible. Specific required permit conditions may include, but not be limited to, the Project applicant's qualified biologist translocating nesting substrate in accordance with the latest scientific research to another suitable location (i.e., a location that supports similar or better floral resources as the impact area), enhancing floral resources on areas of the site that will remain appropriate habitat, worker awareness training, and/or other measures specified by CDFW.*			
4.3-3	Have a substantial adverse effect, either directly or through	*4.3-3* *Prior to the approval of any future Tentative Map, a qualified biologist shall conduct surveys for special-status branchiopod*	City of Elk Grove Community	Prior to the approval of any future Tentative Map	

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	habitat modifications, on special-status branchiopod species.	*species in accordance with the USFWS Survey Guidelines for the Listed Large Branchiopods. The results of the survey shall be submitted to the City of Elk Grove Community Development Department prior to the commencement of construction activities. If vernal pool fairy shrimp and vernal pool tadpole shrimp are not found during protocol-level wet and dry season surveys, further mitigation shall not be required.* *If vernal pool fairy or vernal pool tadpole shrimp are found during protocol-level wet or dry season surveys of the vernal pool, seasonal wetland, and seasonal wetland swale, or if protocol-level surveys are not conducted and the presence of the species is assumed, and if avoidance of all potential vernal pool fairy shrimp and vernal pool tadpole shrimp habitat is not possible, as determined by the Project contractor and qualified biologist, the Project proponent or the U.S. Army Corps of Engineers (USACE) (depending on the regulatory mechanism) shall consult with the USFWS regarding impacts to vernal pool fairy or vernal pool tadpole shrimp associated with the Project. Regardless of the consultation method, the USFWS shall assign measures to avoid, minimize, and mitigate impacts to vernal pool fairy shrimp and vernal pool tadpole shrimp and shall require compensatory mitigation.*	Development Department U.S. Fish and Wildlife Service (USFWS) U.S. Army Corps of Engineers (USACE)		

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		Compensatory measures shall include the following: • *The Project proponent shall prepare a Biological Assessment, including details on potential impacts to and mitigation for impacts to vernal pool fairy shrimp and vernal pool tadpole shrimp, to be submitted to the USACE and/or USFWS.* • *The Project proponent shall abide by mitigation measures developed during the course of the FESA consultation. At a minimum, the applicant shall preserve two acres of vernal pool branchiopod habitat for each acre of unsurveyed or documented occupied habitat impacted. Measures could include preservation, restoration, or enhancement of habitat on- or off-site, purchase of habitat credits from a USFWS-approved mitigation/conservation bank, working with a local land trust to preserve land, or any other method acceptable to USFWS.* *The Project proponent shall ensure that vernal pools and seasonal wetlands that would not be filled are protected during construction by installing exclusion fencing at the edge of the permitted impact area.*			

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			Construction-related activity may not take place in the exclusion area, and exclusion fencing shall be designed to prevent the discharge of storm water runoff from the impact area into the exclusion zone. Exclusion fencing shall be inspected by the project biologist or a trained on-site monitor at least weekly and immediately before and after storm events. Any breaches to the exclusion fencing shall be reported to the project biologist and repaired promptly. The exclusion fencing shall remain in place until all ground-disturbing construction activity is completed.			
4.3-4	Have a substantial adverse effect, either directly or through habitat modifications, on monarch butterfly.	*4.3-4*	*The provisions contained herein only apply if monarch butterfly remains proposed for listing under FESA at the commencement of construction.* *If construction associated with development of any Tentative Map occurs during the time when milkweed plants may host monarch eggs or caterpillars (approximately mid-March through late September), a preconstruction survey shall be conducted by a qualified biologist within the proposed impact area and a 50-foot buffer in accessible areas for the presence of eggs, larvae (i.e., caterpillars), or pupae, at most, 14 days prior to plant removal. Additionally, other plants immediately adjacent to milkweed plants shall also be searched for chrysalises. If eggs, caterpillars, or pupae are not detected, additional protection*	City of Elk Grove Community Development Department USFWS	If monarch butterfly remains proposed for listing under FESA at the commencement of construction	

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		measures are not necessary. A report summarizing the results of the survey shall be submitted for review and approval to the City of Elk Grove Community Development Department. *If eggs, caterpillars, or pupae are found, the plants shall be avoided with a 50-foot buffer until metamorphosis is completed and adult butterflies emerge and leave the host plant. If the eggs, larvae, or chrysalises cannot be avoided, all eggs, larvae, and chrysalises, including the portion of the plant to which they are attached, shall be translocated to an alternative location by a qualified biologist. The location must be a minimum of 50 feet outside of the impact area and contain a similarly sized or larger population of larval host plants. The portions of the plants supporting eggs or chrysalises shall be tied to the live stem of the avoided larval host plant while caterpillars shall be placed directly on a stem or leaf of a larval host plant. Should the species be listed under FESA in the future, coordination with USFWS shall be conducted prior to translocation.*			
4.3-5	Have a substantial adverse effect, either directly or through habitat modifications, on western spadefoot.	*4.3-5*	*Prior to the commencement of construction activities associated with any future Tentative Map, a survey of all suitable aquatic habitat on the site and off-site improvement areas (including features proposed for avoidance) shall be conducted by sampling the features thoroughly with*	City of Elk Grove Community Development Department USFWS	Prior to the commencement of construction activities associated with any future Tentative Map	

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		dipnets during March or early April, when spadefoot tadpoles would be present. In addition, one nocturnal acoustic survey of all areas within 300 feet of vernal pools and seasonal wetlands shall be conducted. The acoustic survey shall consist of walking through the area and listening for the distinctive snore-like call of the species. Timing and methodology for the acoustic survey shall be based on those described in Distribution of the Western Spadefoot (Spea hammondii) in the Northern Sacramento Valley of California, with Comments on Status and Survey Methodology. The results of the survey shall be submitted to the City of Elk Grove Community Development Department. Note that due to the timing requirements, the surveys would likely occur several months before commencement of construction. If the aquatic survey and the nocturnal acoustic survey are negative, further mitigation shall not be necessary. *If western spadefoot is found within the proposed work area (any area that would be temporarily or permanently disturbed) and the species is not a federally-listed species at the time of construction, the following mitigation measure shall be implemented:* • *Western spadefoot tadpoles (as many as are reasonably possible to capture) shall be captured and*			

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		relocated by a CDFW-approved biologist either to on-site avoided and fenced aquatic habitat, or to an off-site open space preserve with suitable habitat in the vicinity of the study area. If western spadefoot is observed within aquatic habitat proposed for avoidance, then the Project proponent shall either (1) relocate the tadpoles to an off-site open space preserve with suitable habitat in the vicinity of the study area, or (2) install silt fencing along the edge of the proposed impact area within 300 feet of the occupied aquatic habitat to prevent metamorphosed individuals from dispersing into the construction area. *If western spadefoot is identified within the proposed work area and the species is a federally-listed species at the time of construction, the following mitigation measure shall be implemented:* • *The Project proponent shall consult with the USFWS regarding impacts to western spadefoot associated with the Project. The Project proponent shall obtain and comply with any conditions of the appropriate take authorization from the USFWS. The conditions in the*			

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		take authorization may include, but shall not be limited to fencing off avoided habitat, worker awareness trainings, preservation, restoration, or enhancement of habitat on- or off-site to compensate for indirect and/or direct effects; purchase of habitat credits from an agency-approved mitigation/conservation bank; working with a local land trust to preserve land; or any other method acceptable to USFWS. *If western spadefoot is found adjacent to but outside of the work area, the following measures shall be implemented:* • *The Project proponent shall install exclusion fencing to prevent western spadefoot from moving into the active construction area. Installation of spadefoot exclusion fencing shall be monitored by a qualified biologist. The fencing shall be inspected and repaired, if necessary, at least weekly. The fencing may be removed following the completion of construction.* • *After the exclusion fencing is installed, a western spadefoot survey shall be conducted no more than 24 hours prior to construction in areas within 300 feet of suitable aquatic habitat. If western*			

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		spadefoot are not found, further mitigation is not necessary. If a western spadefoot is observed within the proposed impact area, a CDFW-approved biologist shall relocate the individual to suitable habitat outside of the proposed impact area prior to construction. • *If western spadefoot move into the work area at any time, work shall cease, and the Project biologist shall be notified. A CDFW-approved biologist shall relocate the individual to suitable habitat outside of the impact area.*			
4.3-6	Have a substantial adverse effect, either directly or through habitat modifications, on northwestern pond turtle.	*4.3-6* *If construction associated with any future Tentative Map would affect inundated portions of Laguna Creek during the active season of northwestern pond turtle (generally April to September), the Project proponent shall conduct a northwestern pond turtle survey to determine whether the species is using Laguna Creek. The survey shall be conducted in accordance with visual encounter survey guidance provided in Chapter 4 of Western Pond Turtle: Biology, Sampling Techniques, Inventory and Monitoring, Conservation, and Management. If northwestern pond turtles are not observed using the aquatic habitat, further mitigation is not necessary.* *If northwestern pond turtles are observed using Laguna Creek within the proposed*	City of Elk Grove Community Development Department USFWS	If construction associated with any future Tentative Map would affect inundated portions of Laguna Creek during the active season of northwestern pond turtle (generally April to September)	

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		work area and the species is not a federally listed species at the time of construction, the following measures shall be implemented: • *Project work within 325 feet of Laguna Creek shall be implemented during the turtles' active season (generally April through September). If northwestern pond turtles are documented to have left the vicinity of the Project, work within 325 feet of Laguna Creek may occur outside of this work window.* • *Prior to dewatering the work area, a qualified biologist shall prepare a northwestern pond turtle avoidance and management plan for review and approval by the City of Elk Grove Community Development Department. The plan shall include requirements for monitoring during the dewatering process to ensure turtles are not harmed; turtle capture and relocation; exclusion fencing to prevent turtle movement into the work area following dewatering; and encounter protocol should northwestern pond turtles move into the work area following dewatering.* *If northwestern pond turtles are observed using Laguna Creek within the proposed*			

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		work area and the species is a federally-listed species at the time of construction, the following mitigation measure shall be implemented: • *The Project proponent shall consult with the USFWS regarding impacts to northwestern pond turtle associated with the Project. The Project proponent shall obtain and comply with any conditions of the appropriate take authorization from the USFWS. The conditions in the take authorization may include, but shall not be limited to fencing off avoided habitat, ceasing construction around northwestern pond turtles found on-site, and allowing the turtles to leave on their own, worker awareness trainings, preservation, restoration, or enhancement of habitat on- or off-site to compensate for indirect and/or direct effects; purchase of habitat credits from an agency-approved mitigation/conservation bank; working with a local land trust to preserve land; or any other method acceptable to USFWS.* *If northwestern pond turtles are observed using Laguna Creek adjacent to but outside of the work area, the following measures shall be implemented:*			

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		• *The Project proponent shall install exclusion fencing to prevent turtles from moving into the active construction area. The fencing shall be inspected and repaired, if necessary, at least weekly. The fencing may be removed following the completion of construction.* • *After the exclusion fencing is installed, a northwestern pond turtle survey shall be conducted no more than 24 hours prior to construction in areas within 325 feet of the limits of inundated areas of Laguna Creek. If northwestern pond turtles are not found, further mitigation is not necessary. If a northwestern pond turtle is observed within the proposed impact area, a qualified biologist shall relocate the individual to suitable habitat outside of the proposed impact area prior to construction.* • *If northwestern pond turtles move into the work area at any time, work shall cease, and the Project biologist shall be notified. A qualified biologist shall relocate the individual to suitable habitat outside of the impact area.*			
4.3-7	Have a substantial adverse effect, either directly or through	*4.3-7(a)* *If ground disturbance or other construction activities associated with any future Tentative Map are proposed during the bird*	City of Elk Grove	Within 14 days prior to the beginning of construction	

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	habitat modifications, on nesting birds and raptors protected under the MBTA and CFGC.	*nesting season (February 1–August 31), a focused survey for nesting raptors and migratory bird nests shall be conducted by a qualified biologist within 14 days prior to the beginning of construction activities in order to identify active nests. In addition, preconstruction (take avoidance) burrowing owl surveys of suitable habitat shall be conducted consistent with the 2012 CDFW Staff Report on Burrowing Owl Mitigation. Non-breeding season protocol shall be used for surveys conducted when construction begins between September 1 and January 31 and breeding season protocol shall be used for surveys conducted when construction begins between February 1 and August 31. The survey(s) shall be conducted within the proposed construction area and all accessible areas within the following buffer areas:* • *0.25 mile for Swainson's hawk,* • *500 feet for tree-nesting raptors and burrowing owls, and* • *50 feet for all other species* *If active nests/burrows are not found, further mitigation is not required. Surveys must be repeated if a lapse in construction activity exceeds 14 days and construction resumes during the nesting season. If active nests/burrows are found the following measures shall be required:*	Community Development CDFW	activities, if ground disturbance or other construction activities associated with any future Tentative Map are proposed during the bird nesting season (February 1–August 31)	

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		• *Active raptor nests: Construction activities shall not take place within 0.25-mile for Swainson's hawk or within 500 feet of other raptor nest(s). The buffer(s) may be removed once a qualified biologist determines the young have fledged and/or are no longer dependent on the nest;* • *Occupied burrowing owl burrows: A minimum buffer of 164 feet shall be established and maintained around the occupied burrow throughout construction. The actual buffer size shall be determined by the qualified biologist based on the time of year and level of disturbance in accordance with guidance provided in the CDFW Staff Report on Burrowing Owl Mitigation and may be as large as 1,640 feet. Construction activities shall not take place within the buffer, and the no-disturbance buffer shall be marked on-site. The buffer may be removed once a qualified biologist determines that the burrow is no longer occupied;* • *Active tricolored blackbird nests: Construction activities shall not take place within 500 feet of active nesting colonies, and a no-disturbance buffer shall be marked on-site. The Project proponent shall*			

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		coordinate with the City of Elk Grove Community Development Department and CDFW to identify appropriate monitoring requirements; • *Active nests of other birds: Construction activities shall not take place within 100 feet of an active nest, and the no-disturbance buffer shall be marked on-site. The buffer may be removed once a qualified biologist determines the young have fledged and/or are no longer dependent on the nest.* *No-disturbance buffers for all species may be reduced based on consultation and approval by the City for Swainson's hawk, burrowing owl, and tricolored blackbird. The perimeter of protected areas on-site shall be indicated by bright orange temporary fencing. Construction activities shall be restricted as necessary to avoid disturbance of the nest until it is abandoned or a qualified biologist deems disturbance potential to be minimal. Restrictions may include establishment of exclusion zones (no ingress of personnel or equipment at a radius of 300 feet around an active raptor nest and a 50-foot radius around an active migratory bird nest) or alteration of the construction schedule. Survey results shall be provided to the City of Elk Grove*			

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		Community Development Department within 14 days of completion of all surveys.			
		4.3-7(b) The Project applicant shall implement the following measures to mitigate the potential loss of Swainson's hawk foraging habitat prior to the commencement of construction activities (e.g., grading activities, infrastructure construction) associated with any future Tentative Map: The Project applicant shall acquire conservation easements or other instruments to preserve suitable foraging habitat for Swainson's hawk. The location of the mitigation parcels, as well as the conservation instruments protecting them, shall be approved by the City. • *The Project applicant shall acquire conservation easements or other instruments to preserve suitable foraging habitat for Swainson's hawk. The location of the mitigation parcels, as well as the conservation instruments protecting them, shall be approved by the City.* • *The amount of land preserved shall be at a ratio provided in Chapter 16.130, Swainson's Hawk Mitigation Fees of the Elk Grove Municipal Code, for each acre developed at the site. In deciding whether to approve the land proposed for preservation, the City*	City of Elk Grove Community Development Department	Prior to the commencement of construction activities associated with any future Tentative Map	

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		shall consider the benefits of preserving lands in proximity to other protected lands. The preservation of land shall be secured before any site disturbance, such as clearing or grubbing, or the issuance of any permits for grading, building, or other site improvements, whichever occurs first. • *The Project applicant shall implement the following minimum conservation easement content standards, or such other requirements as may be updated by the City Council from time to time and as provided in Chapter 16.130:* ○ *The land to be preserved must be found to be suitable Swainson's hawk foraging habitat as determined by the City based on substantial evidence.* ○ *The land shall be protected through either fee title or a conservation easement ("legal agreement") acceptable to the City.* ○ *The legal agreement shall be recordable and contain an accurate legal*			

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		description of the mitigation land. ○ *The legal agreement shall prohibit any activity that in the sole discretion of the City substantially impairs or diminishes the land's capacity as suitable Swainson's hawk foraging habitat.* ○ *If the land's suitability as foraging habitat is related to existing agricultural uses on the land, the legal agreement shall protect any existing water rights necessary to maintain such agricultural uses on the land covered by the document and retain such water rights for ongoing use on the mitigation land.* ○ *Mitigation monitoring fees shall be paid to cover the costs of administering, monitoring, and enforcing the document in an amount determined by the City or a third-party receiving entity approved by the City, not to exceed 10 percent of the easement price or a different amount approved by the City Council.*			

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		○ *Interests in mitigation land shall be held in trust by an entity acceptable to the City and/or the City in perpetuity. The entity shall not sell, lease, or convey any interest in mitigation land without the prior written approval of the City.* ○ *The City shall be named a beneficiary under any legal agreement conveying the interest in the mitigation land to an entity acceptable to the City, and the City shall receive indemnification and defense, and in any legal agreement.* ○ *If any qualifying entity owning an interest in mitigation land ceases to exist, the duty to hold, administer, monitor, and enforce the interest shall be transferred to another entity acceptable to the City or to the City.* • *Before committing to the preservation of any land, the applicant shall obtain approval of the land proposed for preservation.*			

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		4.3-7(c) *If nesting burrowing owls are found during the preconstruction survey required by Mitigation Measure 4.3-7(a) and impacts to such burrowing owls and associated burrows will be avoided pursuant to that measure (such as when burrows are located off-site or within areas of the site not proposed for development), mitigation for the permanent loss of burrowing owl foraging habitat (defined as all areas of suitable habitat within 300 feet of the active burrow) shall be accomplished at a 1:1 ratio for the portion of the habitat within the development area of the Project and at a 0.5:1 ratio for portions of the foraging habitat that lie outside of the development area of the Project (such as Open Space area or an adjacent parcel), all prior to the commencement of ground disturbance activities. The mitigation provided shall be consistent with recommendations in the CDFW Staff Report on Burrowing Owl Mitigation and may be accomplished within the Swainson's hawk foraging habitat mitigation area for the Project if burrowing owls have been documented using the area, or if the qualified biologist, the City, and CDFW collectively determine that the mitigation strategy is suitable for both species.* *If nesting burrowing owls are found, during the preconstruction survey required by Mitigation Measure 4.3-7(a), that cannot be*	City of Elk Grove Community Development Department CDFW	Prior to the approval of any future grading permits, improvement plans, or building permits	

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		avoided or adequately protected with a no-disturbance buffer, an Incidental Take Permit (ITP) shall be obtained from CDFW in order to evict owls from the burrow(s). The ITP process shall include the preparation of an application which shall include, but not be limited to: a description of the project activity, an analysis of potential take of burrowing owl, an analysis of the impact of the proposed take on burrowing owl, an analysis of if the issuance of an ITP would jeopardize the continued existence of the species, proposed mitigation measures, and a monitoring plan to assess the effectiveness of the mitigation measures. Burrowing owls shall not be excluded from occupied burrows until the ITP is approved by CDFW. *If burrowing owls are evicted from burrows or occupied burrows are destroyed by project activities, the Project proponent shall mitigate for the permanent loss of nesting and foraging habitat (defined as all areas of suitable habitat within 300 feet of the active burrow at a ratio of 3:1. The Project proponent shall provide mitigation in the form of purchasing suitable mitigation credits from a CDFW-approved conservation bank, habitat restoration/enhancement on-site or off-site partnership with other agencies or non-profit groups on suitable restoration projects or other biologically suitable mechanisms pre-approved by CDFW.*			

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		In addition, if burrowing owls are evicted from burrows or occupied burrows are destroyed by Project activities, the Project proponent will mitigate for all temporary impacts (may include, but not limited to, temporary ground disturbance and vegetation removal before, or during construction) to burrowing owls and their habitats at a ratio of 0.5:1 to reduce project impacts to a less than significant level. The Project proponent shall provide mitigation in the form of purchasing suitable mitigation credits from a CDFW-approved conservation bank, habitat restoration/enhancement onsite or offsite, partnership with other agencies or non-profit groups on suitable restoration projects, or other biologically suitable mechanisms pre-approved by CDFW.			
4.3-8	Have a substantial adverse effect, either directly or through habitat modifications, on roosting bats.	*4.3-8 Prior to the commencement of construction activities associated with any future Tentative Map, a qualified biologist shall conduct a bat habitat assessment of all potential roosting habitat features, including trees and structures within the proposed impact footprint within the Project vicinity. The habitat assessment shall identify all potentially suitable roosting habitat and may be conducted up to one year prior to the start of construction. The results of the assessment shall be submitted to the City of Elk Grove Community Development Department.*	City of Elk Grove Community Development Department	Prior to the commencement of construction activities associated with any future Tentative Map	

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		• *If potential roosting habitat is identified (cavities in trees or potential roosts within structures) within the areas proposed for impact, the biologist shall survey the potential roosting habitat during the active season (generally April through October or from January through March on days with temperatures in excess of 50 degrees Fahrenheit) to determine the presence of roosting bats. The surveys are recommended to be conducted utilizing methods that are considered acceptable by bat experts after consultation with CDFW. Methods may include evening emergence surveys, acoustic surveys, inspecting potential roosting habitat with fiberoptic cameras, or a combination thereof.* • *If roosting bats are identified within any of the trees planned for removal, or if presence is assumed, the trees shall be removed outside of pup season, only on days with temperatures in excess of 50 degrees Fahrenheit. Pup season is generally during the months of May through August. Two-step tree removal shall be utilized under the supervision of the qualified biologist. Two-step tree removal involves*			

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		removal of all branches of the tree that do not provide roosting habitat on the first day, and then the next day cutting down the remaining portion of the tree. • *Additionally, all other tree removal shall be conducted from January through March on days with temperatures in excess of 50 degrees Fahrenheit to avoid potential impacts to foliage-roosting bat species.* • *If roosting bats are identified within any structures planned for removal, a bat exclusion plan shall be prepared by a qualified bat biologist describing the methods to be used to humanely exclude bats prior to disturbance. The plan shall be approved by the City of Elk Grove Community Development Department after consultation with CDFW and shall be implemented prior to the start of construction.* • *The requirements for the bat expert and City to consult with CDFW prior to approving survey methods and a bat exclusion plan shall be satisfied either where CDFW responds to requests for consultation within 30 days of the requests or where the bat expert and City have attempted to consult with CDFW but CDFW has failed to respond to the request*			

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		within 30 days of the placement of the request.			
4.3-9	Have a substantial adverse effect, either directly or through habitat modifications, on American badger.	*4.3-9 The Project applicant shall retain a qualified biologist to conduct a preconstruction survey to determine the presence or absence of badgers prior to initiation of ground-disturbing activities associated with any future Tentative Map. If badgers are not identified, further mitigation is not required. If an active badger den is identified during preconstruction surveys within or immediately adjacent to an area subject to construction, a qualified biologist shall establish a construction-free buffer of up to 300 feet around the badger den. Once the biologist has determined that the badger has vacated the burrow, the burrow can be collapsed or excavated, and ground disturbance can proceed. Should the burrow be determined to be a natal or reproductive den, and because badgers are known to use multiple burrows in a breeding burrow complex, a biological monitor shall be present on-site during construction activities in the vicinity of the burrows to ensure that the buffer is adequate to avoid direct impact to individuals or natal/reproductive den abandonment. The monitor shall be required to be present until the badger young are determined to be of an independent age and construction activities would not harm individual badgers. A written summary of the survey results shall be submitted to the City*	City of Elk Grove Community Development Department	Prior to initiation of ground-disturbing activities associated with any future Tentative Map	

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			of Elk Grove Community Development Department.			
4.3-10	Have a substantial adverse effect on any riparian habitat or other sensitive natural community, or State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.	*4.3-10(a)*	*Prior to the approval of any improvement plans, the project proponent shall submit a formal Aquatic Resources Delineation for the on- and off-site areas to the U.S. Army Corps of Engineers (USACE) for verification purposes and determination as to whether the Project activities will require a Clean Water Act (CWA) Section 404 permit. The Aquatic Resources Delineation shall be conducted in accordance with the USACE Sacramento District's Minimum Standards for Acceptance of Preliminary Aquatic Resources Delineations and the USACE Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region (Version 2.0). The Aquatic Resources Delineation shall also document the expected impact on the jurisdictional wetlands and waters that would result from the project. A copy of the USACE's determination shall be submitted to the City of Elk Grove Community Development Department.*	USACE City of Elk Grove Community Development Department	Prior to the approval of any improvement plans	
		4.3-10(b)	*If a CWA Section 404 permit is determined to be necessary, prior to the issuance of grading permits, the Project applicant shall apply for and obtain a Section 404 permit from the USACE. Waters that would be lost or disturbed shall be restored, replaced or rehabilitated on a "no-net-loss" basis. Habitat restoration, rehabilitation, and/or*	USACE Regional Water Quality Control Board (RWQCB)	If a CWA Section 404 permit is determined to be necessary, prior to the issuance of grading permits	

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		replacement shall be at a location and by methods acceptable to the USACE. In the event that a Section 404 permit is required, the Project applicant shall also apply for and obtain a Section 401 water quality certification from the Regional Water Quality Control Board (RWQCB) prior to the issuance of grading permits and adhere to the certification conditions therein. The Project applicant shall submit a Report of Waste Discharge to the Central Valley RWQCB with a request for waste discharge requirements and adhere to the waste discharge requirements.			
		4.3-10(c) *If the final Project design would result in permanent impacts to aquatic resources that meet the definition of a river or stream under the California Code of Regulations, riparian vegetation or the 100-year floodplain of a river or stream, the Project proponent shall notify CDFW of the proposed alteration pursuant to Fish and Game Code Section 1600, Lake or Streambed Alteration prior to approval of any future Tentative Maps. Minimization and avoidance measures shall be proposed as appropriate and may include preconstruction species surveys and reporting, protective fencing around avoided biological resources, worker environmental awareness training, seeding disturbed areas adjacent to open space areas with native seed, and installation of project-specific storm water BMPs. Mitigation may include*	CDFW	Prior to approval of any future Tentative Maps	

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			restoration or enhancement of resources on- or off-site, purchase of habitat credits from an agency-approved mitigation/conservation bank off-site, working with a local land trust to preserve land, or any other method acceptable to CDFW.			
4.3-12	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, or have a substantial adverse effect on the environment by converting	*4.3-12*	*Prior to ground-disturbing activities and work within the critical root zone, removal, topping, or relocation of any tree of local importance, a Tree Permit shall be obtained from the City of Elk Grove, Community Development Department, and the Project applicant shall comply with all of the conditions of the permit. As part of the approval of a Tree Permit for removal of a tree, the Project applicant shall mitigate for the loss of the trees consistent with Article IV (Mitigation for Tree Loss) of EGMC Chapter 19.12. A tree mitigation plan shall be submitted to and approved by the City Arborist. Unless an alternative mitigation is approved by the City Arborist, as provided in EGMC Section 19.12.180 (Alternative mitigation requirements), the tree mitigation plan shall include the following mitigation options to ensure mitigation for the loss of protected trees is provided at a ratio of one new inch diameter at standard height (DSH) of tree for each inch DSH lost (1:1 ratio):* • *<u>On-Site or Off-Site Replacement.</u> The plan shall specify where the tree(s) shall be planted and how the*	City of Elk Grove Community Development Department City Arborist	Prior to ground-disturbing activities and work within the critical root zone, removal, topping, or relocation of any tree of local importance	

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		tree(s) shall be monitored and maintained for a minimum of five years. The City may require the establishment of a performance bond or other surety as a way to ensure that the replacement trees survive for the minimum establishment period as provided in EGMC Section 19.12.190. The City shall allow the use of on-site trees planted under a mitigation plan as a way to meet any other on-site landscaping requirement, including parking lot shading, street landscaping, and street trees on residential lots; • *Payment of an In-Lieu Fee as Adopted by Resolution of the City Council. The Project applicant may pay an in-lieu fee for the loss of the tree(s) at a rate established by the City Council. Such monies shall be deposited in the tree preservation fund as described in EGMC Section 19.12.220; or* • *Credit for Existing Trees Smaller Than When a Permit Is Required. The Project applicant may be entitled to mitigation credit when species of trees that are listed in EGMC Section 19.12.040 (Trees of local importance) are preserved, but are smaller than the size threshold defined in EGMC Section*			

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		19.12.040 (i.e., less than six inches DSH). The City Arborist shall make the determination after reviewing the location of the tree(s), the quality of the environment (both pre- and post-project) in which the tree(s) is located, potential impacts to the tree(s) from proposed development, and other relevant factors that the City Arborist deems relevant to the long-term viability of the tree(s). If approved for credit, retained trees shall receive a credit of one inch DSH per tree for trees between two and five inches DSH. The City may require the establishment of a performance bond or other surety as a way to ensure that the tree(s) survive for the minimum establishment period as provided in EGMC Section 19.12.190.			
Chapter 4.4 –Cultural and Tribal Cultural Resources					
4.4-1	Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines, Section 15064.5.	*4.4-1 Prior to construction of any off-site improvements to the Road/Waterman Road and/or Sheldon Road/Bradshaw Road roundabout(s), a cultural resources study shall be conducted to determine if any cultural resource sites are present. The study shall be conducted by a qualified archaeologist that meets the Secretary of the Interior's Standards for Archaeology.*	City of Elk Grove Community Development Department	Prior to construction of any off-site improvements to the Road/Waterman Road and/or Sheldon Road/Bradshaw Road roundabout(s)	

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		If cultural resource site indicators are found during the study recommended above and would be impacted by the proposed improvements, the preferred treatment of the resource is protection and preservation. Protection and preservation shall be achieved in one of two ways: direct avoidance (i.e., not developing within the boundaries of the cultural resource site); or by protecting intact archaeological deposits through the placement of sufficient fill over the deposit during and after construction. *If protection and preservation are not possible, then a subsurface testing program shall be conducted to determine if the cultural resource site is eligible for inclusion on the California Register or the Elk Grove Register. The subsurface testing program shall be overseen by an archaeologist who meets the Secretary of the Interior's Standards and shall be outlined in a Subsurface Testing Program Plan for Cultural Resources. The plan shall include the following: a research design appropriate for the cultural resource site type; a discussion and rationale of the investigation's field and laboratory methods; and an identification of the planned treatment and disposition of any recovered cultural materials, including the steps that shall be followed in the event of discovery of human remains. The identified steps shall be consistent with Health and Safety Code*			

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		Section 7050.5. Following the completion of the subsurface testing program, a report shall be prepared that documents the methods of investigation, the types of analyses conducted, and a determination of the cultural resource site's eligibility for inclusion on the California Register of Historic Resources (CRHR). The report shall include completed appropriate Department of Parks and Recreation (DPR) 523 forms for the cultural resource site. *If the testing program finds that a cultural resource site eligible for listing on the CRHR would be impacted, and protection and preservation is not possible, then data recovery of the impacted locations shall be necessary. Data recovery shall be performed by a qualified archaeologist that meets the Secretary of the Interior's Standards using appropriate archaeological techniques. Data recovery shall include processing and analysis of recovered cultural materials using appropriate archaeological methods, as well as the preparation of the recovered materials for permanent disposition pursuant to the requirements of the Archaeological Resources Treatment Plan. Monitoring may also be recommended by the archaeologist, but the decision to recommend monitoring as a mitigation measure shall be dependent upon the findings of the testing program.*			

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			Proof of compliance with the aforementioned standards shall be submitted to the City of Elk Grove Community Development Department for review and approval.			
4.4-2	Cause a substantial adverse change in the significance of a unique archeological resource pursuant to CEQA Guidelines, Section 15064.5 or disturb human remains, including those interred outside of dedicated cemeteries.	*4.4-2(a)*	*If potential cultural resources, tribal cultural resources, or archaeological artifacts are discovered during grading or construction activities within the site, work shall halt immediately within 100 feet of the discovery based on the apparent distribution of the resources, the City of Elk Grove Community Development Department shall be notified, and a professional archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards in archaeology shall be retained to determine the significance of the discovery. In addition, a Native American Representative from the federally recognized Wilton Rancheria will assess the significance of the find and make recommendations for further evaluation and treatment if necessary. Examples of potential cultural materials include but are not limited to midden soils, artifacts, chipped or worked stone, baked clay, shell, or bone.* *If resources are determined to be potentially significant, the City shall require the preparation of a treatment plan and report of findings for cultural and tribal cultural resources. The City, the applicant, and a representative of Wilton Rancheria shall consult and agree to implement all measures the City deems feasible. Culturally*	City of Elk Grove Community Development Department Wilton Rancheria	During grading or construction activities	

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		appropriate treatment that preserves or restores the cultural qualities and integrity of a Tribal Cultural Resource may be, but is not limited to, processing materials for reburial, minimizing handling of cultural objects, leaving objects in place within the landscape, construction monitoring of any further activities by a tribal representative, and or returning the objects to a location within the project area where they will not be subject to future impacts. Wilton Rancheria does not consider curation of tribal cultural resources to be appropriate or respectful and requests that materials not be permanently curated, unless specifically requested by the Tribe. Additional measures may include avoidance, preservation in place, excavation, documentation, curation, data recovery, or other appropriate measures. The applicant shall be required to implement measures necessary for the protection and documentation of cultural resources.			
		4.4-2(b) *Before the start of any earthmoving activities, the Project owner shall retain a qualified scientist (e.g., geologist, biologist, paleontologist) to train all construction personnel involved with earthmoving activities, including the site superintendent, regarding the possibility of encountering fossils, the appearance and types of fossils likely to be seen during construction, and proper notification procedures should fossils*	City of Elk Grove Community Development Department	Before the start of any earthmoving activities	

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		be encountered. Training on paleontological resources shall also be provided to all other construction workers but may use videotape of the initial training and/or written materials rather than in- person training. If any paleontological resources (fossils) are discovered during grading or construction activities within the Project area, work shall be halted immediately within 50 feet of the discovery, and the City of Elk Grove Community Development Department shall be immediately notified. The Project owner will retain a qualified paleontologist to evaluate the resource and prepare a recovery plan in accordance with Society of Vertebrate Paleontology guidelines (SVP 2010). The recovery plan may include but is not limited to a field survey, construction monitoring, sampling and data recovery procedures, museum storage coordination for any specimen recovered, and a report of findings. Recommendations in the recovery plan that are determined by the City to be necessary and feasible will be implemented by the applicant before construction activities resume in the area where the paleontological resources were discovered.			
		4.4-2(c) Prior to the start of any ground disturbing activities, a qualified archaeologist meeting the United States Secretary of Interior guidelines for professional archaeologists shall be retained to develop a construction worker awareness brochure. This brochure	City of Elk Grove Community Development Department	Prior to the start of any ground disturbing activities	

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		shall be distributed to all construction personnel and supervisors who will have the potential to encounter cultural resources. Proof of compliance shall be submitted to the City of Elk Grove Community Development Department. The topics to be addressed in the Worker Environmental Awareness Program will include, at a minimum: • *Types of cultural resources expected in the project area;* • *What to do if a worker encounters a possible resource;* • *What to do if a worker encounters bones or possible bones; and* • *Penalties for removing or intentionally disturbing cultural resources, such as those identified in the Archeological Resources Protection Act.*			
		4.4-2(d) In the event of the accidental discovery or recognition of any human remains, the County Coroner and the Native American Heritage Commission shall be contacted immediately, and the City of Elk Grove Community Development Department shall be notified, and further excavation or disturbance of the find or any nearby area reasonably suspected to overlie adjacent human remains shall not occur until compliance with the provisions of CEQA Guidelines Section 15064.5(e)(1) and (2)	City of Elk Grove Community Development Department County Coroner Native American	During construction in the event of the accidental discovery or recognition of any human remains	

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		has occurred. The Guidelines specify that in the event of the discovery of human remains other than in a dedicated cemetery, no further excavation at the site or any nearby area suspected to contain human remains shall occur and the County Coroner shall be notified to determine if an investigation into the cause of death is required. If the coroner determines that the remains are Native American, then, within 24 hours, the Coroner must notify the Native American Heritage Commission, which in turn will notify the most likely descendants who may recommend treatment of the remains and any grave goods. A Native American Representative from the federally recognized Wilton Rancheria shall also be notified and make recommendations for further treatment if necessary. If the Native American Heritage Commission is unable to identify a most likely descendant or most likely descendant fails to make a recommendation within 24 hours after notification by the Native American Heritage Commission, or the landowner or his authorized agent rejects the recommendation by the most likely descendant and mediation by the Native American Heritage Commission fails to provide a measure acceptable to the landowner, then the landowner or his authorized representative shall rebury the human remains and grave goods with appropriate dignity at a location on the	Heritage Commission (NAHC) Wilton Rancheria		

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		property not subject to further disturbances. After review of the find and consultation with the most likely descendant, the authority to proceed may be accompanied by the addition of development requirements which provide for protection and preservation of the site and/or additional measures necessary to address the sensitive and unique nature of the site. Should human remains be encountered, a copy of the resulting County Coroner report noting any written consultation with the Native American Heritage Commission shall be submitted as proof of compliance to the City of Elk Grove Community Development Department. Work on the site cannot commence until after the human remains are removed from the area or, if reburial is determined to be the appropriate course of action, reburied at a location on the property not subject to further disturbance. Should human remains be encountered, a copy of the resulting County Coroner report noting any written consultation with the Native American Heritage Commission shall be submitted as proof of compliance to the City of Elk Grove Community Development Department. All treatment recommendations made by the tribe and other cultural resources specialists shall be documented in the confidential portion of the project record. *4.4-2(e) Implement Mitigation Measure 4.4-1.*			

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			See Mitigation Measure 4.4-1	See Mitigation Measure 4.4-1	
4.4-3	Cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074.	*4.4-3(a)* *Implement Mitigation Measures 4.4-2(a) through 4.4-2(e).*	See Mitigation Measures 4.4-2(a) through 4.4-2(e)	See Mitigation Measures 4.4-2(a) through 4.4-2(e)	
		4.4-3(b) *Prior to approval of any construction plans for the Project (e.g., grading, improvement plans), the City and Project applicant shall coordinate with the Wilton Rancheria to conduct a Tribal Survey of the site, which shall inform future ground-disturbing monitoring. Prior to approval of construction plans, the Project applicant shall enter into (i) an Inadvertent Discovery Treatment Plan, in substantially the form presented by Wilton Rancheria; and (ii) a Tribal Monitoring Agreement between the Project applicant and Wilton Rancheria whereby the applicant retains the services of a paid tribal monitor provided by the Wilton Rancheria to monitor certain Project activities described below, which agreement shall be to the satisfaction of the Wilton Rancheria.* *For earthwork and other ground-disturbing phases of construction, the Project applicant shall provide access to the site for a tribal monitor from Wilton Rancheria as further described herein. On-site monitoring shall be required for all construction phases that involve earthwork or ground-disturbing activities, with the exception of any*	City of Ek Grove Community Development Department Wilton Rancheria	Prior to approval of any construction plans for the Project	

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		earthwork or ground-disturbing activities in areas that have been previously disturbed or in areas that are explicitly identified by Wilton Rancheria during the Tribal Survey as excluded from the tribal monitoring requirement. The Project applicant shall provide the City Community Development Department with notice 10 business days prior to commencing any earthwork or other ground-disturbing activities subject to monitoring hereunder. Following receipt of such notice, the City Community Development Department shall contact the Wilton Rancheria tribal representative a minimum of seven business days before the Project applicant begins earthwork or other ground-disturbing activities to schedule the tribal monitor to be present on-site during such activities. If a response is not received 48 hours prior to commencement of ground-disturbing activities, construction activities shall proceed without the tribal monitor on-site. Should the tribal monitor not respond to the City's request for the presence of a monitor, or should the tribal monitor elect not to participate, the Project applicant's Construction Manager shall monitor for potential discoveries. The on-site monitoring shall end when the site earthwork and ground-disturbing activities are completed or when the tribal representatives and monitor have indicated that the site has a low potential for affecting tribal cultural resources.			

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Chapter 4.5 – Geology and Soils					
4.5-3	Be located on a geological unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse, or be located on expansive soil, as defined in Table 18-1B of the Uniform Building Code, creating substantial risks to life or property.	*4.5-3*	*In conjunction with the submittal of any improvement plans associated with future Tentative Maps or the off-site improvements, the Project applicant shall submit a design-level geotechnical engineering report produced by a California Registered Civil Engineer or Geotechnical Engineer to the City of Elk Grove Community Development Department for review and approval. The report shall include the results of a site-specific subsurface exploration, laboratory testing, and engineering analysis. The design-level report shall be performed after site configuration/layout has been established. The investigation shall include several exploratory borings and test pits throughout the site to evaluate the potential presence of undocumented fill, tilled/disturbed soil thickness, liquefaction potential, and excavation characteristics. The design-level geotechnical engineering report shall evaluate soil expansion potential and include the results of a laboratory plasticity index and expansion index testing. The report shall include the geotechnical recommendations specified in the Geotechnical Engineering Report prepared for the site by WKA, unless it is determined in the design-level report that one or more recommendations need to be revised. The report shall also address the off-site improvement areas.*	City of Elk Grove Community Development Department	In conjunction with the submittal of any improvement plans associated with future Tentative Maps or the off-site improvements	

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		The design-level geotechnical engineering report shall address, at a minimum, the following: • *Compaction specifications and subgrade preparation for on-site soils;* • *Structural foundations;* • *Grading practices;* • *Liquefaction potential; and* • *Expansive/unstable soils, including fill.* *Prior to approval of any improvement plans and issuance of building permits, the foundation and improvement plans shall incorporate design-level recommendations. Road improvements shall meet the standards provided in the City's Improvement Standards, including related to soil and base compaction. All foundation and improvement plans shall be reviewed and approved by the City of Elk Grove Community Development Department.*			
4.5-4	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	*4.5-4* *Prior to the start of on- or off-site ground-disturbing activities associated with any future Tentative Maps, the Project applicant shall inform all construction personnel involved with earthmoving activities regarding the possibility of encountering fossils, the appearance and types of fossils likely to be seen during construction, and*	City of Elk Grove Community Development Department	Prior to the start of on- or off-site ground-disturbing activities associated with any future Tentative Maps	

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		proper notification procedures should fossils be encountered. Should paleontological resources be discovered during ground-disturbing activities, work shall be immediately halted in the area within 50 feet of the find. Construction may continue in areas outside of the buffer zone. The applicant shall notify the City of Elk Grove Community Development Department and retain a qualified paleontologist to inspect the discovery. If not deemed significant, further mitigation is not necessary. If deemed significant under criteria established by the Society for Vertebrate Paleontology with respect to authenticity, completeness, preservation, and identification, the resource(s) shall then be salvaged by the qualified paleontologist and deposited in an accredited and permanent scientific institution (e.g., University of California Museum of Paleontology [UCMP] or Sierra College), where the discovery would be properly curated and preserved for the benefit of current and future generations. A report detailing the findings of the qualified paleontologist and ultimate deposition of the resource(s) shall be submitted to the City before construction activities can resume at the site where the paleontological resource(s) was discovered. The language of this mitigation measure shall be included on any future grading plans, utility plans, and improvement plans approved by the City of Elk Grove Community Development			

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			Department for the Project where excavation work would be required.			
Chapter 4.6 – Hazards and Hazardous Materials						
4.6-2	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment.	*4.6-2(a)*	*For any Tentative Map where disturbance of the area containing the on-site soil stockpiles would not occur, the stockpiles may be retained in place and mitigation is not necessary. For any Tentative Map involving disturbance in the area containing the on-site soil stockpiles, or for any future development that contemplates removal or relocation of the stockpiles, samples of the soil stockpiles shall be obtained for analysis of contaminants of concern and comparison with applicable regulatory screening levels (i.e., Environmental Screening Levels, California Human Health Screening Levels, Regional Screening Levels, etc.). If soil contaminants are not found, further action is not required. However, where the soil contaminant concentrations exceed the applicable regulatory screening levels, the impacted soil stockpiles shall be excavated prior to any grading activities in the vicinity and properly disposed of off-site by a licensed professional at a permitted landfill facility to the satisfaction of the City of Elk Grove Community Development Department and the Sacramento County Environmental Management Department (EMD).*	City of Elk Grove Community Development Department Sacramento County Environmental Management District (EMD)	Prior to removal or relocation of on-site soil stockpiles	
		4.6-2(b)	*If indicators of apparent soil contamination (soil staining, odors, debris fill material, etc.)*	City of Elk Grove	During construction activities associated	

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		are encountered on-site during construction activities associated with any future Tentative Map, the impacted area(s) shall be isolated from surrounding, non-impacted areas. A State-licensed engineering geologist shall obtain samples of the potentially impacted soil for analysis of the contaminants of concern in accordance with applicable U.S. Environmental Protection Agency (USEPA) Methods and comparison with applicable regulatory screening levels (i.e., Environmental Screening Levels, California Human Health Screening Levels, Regional Screening Levels, etc.). The soil sampling analysis shall be submitted for review and approval to the City of Elk Grove Community Development Department. Where the soil contaminant concentrations exceed the applicable regulatory screening levels, the impacted soil shall be excavated and disposed of off-site at a licensed landfill facility to the satisfaction of the Sacramento County Environmental Management Department.	Community Development Department Sacramento County EMD	with any future Tentative Map, if indicators of apparent soil contamination (soil staining, odors, debris fill material, etc.) are encountered on-site	
		4.6-2(c) The Project applicant shall hire a licensed well contractor to obtain a well abandonment permit from the Sacramento County EMD for all on-site wells, and properly abandon the on-site wells prior to approval of any future Tentative Maps, pursuant to Department of Water Resources Bulletin 74-81 (Water Well Standards, Part III), for review and approval by the Sacramento County EMD. In addition,	Sacramento County EMD City of Elk Grove Community Development Department	Prior to approval of any future Tentative Maps and prior to Improvement Plan approval	

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		prior to Improvement Plan approval, the Project applicant shall ensure that any on-site septic systems are abandoned in compliance with applicable Sacramento County EMD standards. Verification of abandonment and/or water quality testing shall be ensured by the City of Elk Grove Community Development Department.			
		4.6-2(d) Prior to approval of any future Tentative Maps, a surficial soil sample laboratory analysis shall be conducted on the areas of the site proposed for development as part of a Phase II ESA. Once the soils are collected, the soils shall be tested for organochlorine pesticides (OCPs), lead, and asbestos. If soil contaminates are not found, further action is not required; however, if OCPs, lead, or asbestos is found to be higher than the allowable thresholds, the Phase II ESA shall include the appropriate mitigation including, but not limited to, soil remediation to an acceptable total threshold limit concentration (TTLC) level per applicable State and federal regulations by excavation of the contaminated soil, and subsequent transportation and disposal off-site at an appropriate Class I or Class II facility permitted by DTSC; or by properly capping the contaminated soil, in compliance with DTSC regulations (e.g., placing soils underneath project roadways, etc.). All recommended mitigation measures shall be implemented by the Project applicant,	City of Elk Grove Community Development Department	Prior to approval of any future Tentative Maps	

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		subject to review and approval by the City of Elk Grove Community Development Department.			
		4.6-2(e) Prior to issuance of a demolition permit by the City for any on-site structures, the Project applicant shall provide a site assessment that determines whether any structures to be demolished contain lead-based paint (LBP) or asbestos. If structures do not contain LBP or asbestos, further mitigation is not required; however, if LBP is found, all loose and peeling paint shall be removed and disposed of by a licensed and certified lead paint removal contractor, in accordance with California Air Resources Board recommendations and OSHA requirements. If asbestos is found, all construction activities shall comply with all requirements and regulations promulgated through the Sacramento Metropolitan Air Quality Management District (SMAQMD) Rule 902. The demolition contractor shall be informed that all paint on the buildings shall be considered as containing lead and/or asbestos. The contractor shall follow all work practice standards set forth in the Asbestos National Emission Standards for Hazardous Air Pollutants (Asbestos NESHAP, 40 CFR, Part 61, Subpart M) regulations, as well as Section V, Chapter 3 of the OSHA Technical Manual. Work practice standards generally include appropriate precautions to protect construction workers and the surrounding	City Engineer	Prior to issuance of a demolition permit by the City for any on-site structures	

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		community, and appropriate disposal methods for construction waste containing lead paint or asbestos in accordance with federal, State, and local regulations subject to approval by the City Engineer.			
		4.6-2(f) Prior to approval of the first Tentative Map associated with the Project, a Phase I ESA shall be prepared for the off-site improvement areas and submitted to the City for review and approval. The Phase I ESA shall be prepared by a licensed contractor with the purpose of observing and assessing the conditions encountered at the proposed roadway and utility infrastructure improvement areas and providing conclusions and recommendations relative to any hazardous conditions or materials identified on-site. All recommendations set forth in the Phase I ESA shall be required as a condition of approval on the Tentative Map and appropriately incorporated into the off-site improvement areas of the Project, subject to review and approval by the City of Elk Grove Community Development Department. If the Phase I ESA identifies a Recognized Environmental Condition (REC) requiring a Phase II ESA, a Phase II ESA shall be prepared and submitted to the City of Elk Grove Community Development Department for review and approval to confirm or rule out the presence of potential hazardous substances associated with the identified REC. If the Phase II ESA does not	City of Elk Grove Community Development Department	Prior to approval of the first Tentative Map associated with the Project	

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			identify the presence of hazardous substances, further mitigation is not necessary. If the Phase II ESA does identify the presence of hazardous substances, the Phase II ESA shall include the appropriate means of remediation sufficient to reduce associated risks to an acceptable level pursuant to applicable City, State, and federal regulations, as determined by a licensed contractor. Remediation could include, but would not be limited to, excavation of contaminated soil and subsequent transportation and disposal off-site or properly capping contaminated soil. All recommendations set forth in the Phase II ESA shall be required as a condition of approval on the Tentative Map and implemented by the Project applicant, subject to review and approval by the City of Elk Grove Community Development Department.			
Chapter 4.7 – Hydrology and Water Quality						
4.7-1	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality during construction.	*4.7-1*	*Prior to issuance of grading permits, the contractor shall prepare a Storm Water Pollution Prevention Plan (SWPPP) for review and approval by the State Water Resources Control Board (SWRCB). The developer shall file the Notice of Intent (NOI) and associated fee to the SWRCB. The SWPPP shall serve as the framework for identification, assignment, and implementation of BMPs. The contractor shall implement BMPs to reduce pollutants in stormwater discharges to the maximum*	SWRCB City Engineer	Prior to issuance of grading permits	

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			extent practicable. Construction (temporary) BMPs for the Project may include, but are not limited to: fiber rolls, straw bale barrier, straw wattles, storm drain inlet protection, velocity dissipation devices, silt fences, wind erosion control, stabilized construction entrance, hydroseeding, revegetation techniques, and dust control measures. The SWPPP shall be submitted to the City Engineer for review and approval and shall remain on the site during all phases of construction. Following implementation of the SWPPP, the contractor shall subsequently demonstrate the SWPPP's effectiveness and provide for necessary and appropriate revisions, modifications, and improvements to reduce pollutants in stormwater discharges to the maximum extent practicable.			
4.7-2	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality during operations.	*4.7-2(a)*	*Prior to approval of final Project improvement plans, the Project applicant shall submit a detailed Best Management Practice (BMP) and water quality maintenance plan to the City Community Development Department for review and approval. The BMP and water quality maintenance plan shall meet the standards of the City's NPDES Permit (No. CAS0085324), the California Stormwater Quality Association (CASQA) Stormwater BMP Handbook for New Development and Redevelopment, and the Stormwater Quality Design Manual for the Sacramento region. Site design measures, source control*	City of Elk Grove Community Development Department	Prior to approval of final Project improvement plans	

MITIGATION MONITORING AND REPORTING PROGRAM Summer Villas Special Planning Area Project						
Impact Number	**Impact**	**Mitigation Measures**		**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
			measures, hydromodification management, and Low Impact Development (LID) standards, as necessary, shall be incorporated into the design and shown on the improvement plans.			
		4.7-2(b)	*Prior to approval of final Project improvement plans, the Project applicant shall submit a maintenance covenant to the City Community Development Department for review and approval. The maintenance covenant shall be recorded against the title to the site in the Office of the Sacramento County Recorder and shall bind any and all subsequent owners of the property to ensure the long-term maintenance of stormwater quality measures.*	City of Elk Grove Community Development Department	Prior to approval of final Project improvement plans	
4.7-4	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; or create or contribute runoff water which would exceed the capacity of existing or	*4.7-4*	*In conjunction with submittal of any development applications for future on-site development or any off-site roadway improvements related to the Project, such as roundabout widening, the Project applicant shall submit, for review and approval, a design-level drainage report to the City of Elk Grove Community Development Department. The report shall be prepared by a Registered Civil Engineer and shall, at a minimum, include: written text addressing existing conditions; watershed maps; changes in flows and patterns affected by the proposed off- and on-site improvements; and all appropriate calculations, including sizing and location. The report shall include an evaluation of the drainage system design*	City of Elk Grove Community Development Department	In conjunction with submittal of any development applications for future on-site development or any off-site roadway improvements related to the Project	

MITIGATION MONITORING AND REPORTING PROGRAM Summer Villas Special Planning Area Project						
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	planned stormwater drainage systems or provide substantial additional sources of polluted runoff.		*in accordance with all applicable design parameters and requirements set forth by the City of Elk Grove, including, but not limited to, the inclusion of appropriate stormwater quality and LID features; conveyance and attenuation infrastructure sufficient to ensure post-project peak flows are equal to or less than pre-project peak flows; and the ability to accommodate post-development flows (inclusive of off-site flows) in the 100-year, 24-hour storm event, unless a different design storm is specified by the City. Design-level recommendations provided in the drainage report shall be included in the improvement plans prior to their approval by the City of Elk Grove Community Development Department.*			
4.7-5	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows, or in flood hazard, tsunami, or seiche zone, risk release of pollutants due to project inundation.	*4.7-5(a)*	*Prior to issuance of any grading permits associated with the Project, the Project contractor shall submit improvement plans to the City of Elk Grove Community Development Department and City Engineer for review and approval that demonstrate that all residential development and development associated with the private community recreation center/clubhouse would occur outside of the FEMA mapped SFHA. Benchmark elevation and location shall be shown on the improvement plans to the satisfaction of the City Engineer.*	City of Elk Grove Community Development Department City Engineer	Prior to issuance of any grading permits associated with the Project	
		4.7-5(b)	*Prior to approval of any improvement plans for the pedestrian bridge across Laguna Creek, off-site improvements to the Sheldon*	City of Elk Grove Community	Prior to approval of any improvement plans for the	

MITIGATION MONITORING AND REPORTING PROGRAM Summer Villas Special Planning Area Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		Road/Bradshaw Road intersection, and on-site storm drain system improvements, the improvement plans shall demonstrate, to the satisfaction of the City Engineer, that the improvements would be designed to avoid the FEMA mapped SFHA. Benchmark elevation and location shall be shown on the improvement plans to the satisfaction of the City Engineer. *If placement of the vertical supports or other components of the pedestrian bridge or any components of the storm drain system or off-site Sheldon Road/Bradshaw Road intersection improvements would occur within the SFHA, the improvement plans shall demonstrate that the improvements would be designed in compliance with Section 16.50.060 of the EGMC, subject to review and approval by the City of Elk Grove Community Development Department and City Engineer. In addition, the applicant shall provide calculations certified by a California registered civil engineer or licensed land surveyor to the City Engineer demonstrating that the improvements will not result in any increase in the BFE.* *If any of the improvements would result in a modification to the FEMA mapped SFHA, the applicant shall obtain from FEMA, a Conditional Letter of Map Revision (CLOMR). A copy of the letter shall be provided to the Elk Grove Community*	Development Department City Engineer	pedestrian bridge across Laguna Creek, off-site improvements to the Sheldon Road/Bradshaw Road intersection, and on-site storm drain system improvements	

MITIGATION MONITORING AND REPORTING PROGRAM Summer Villas Special Planning Area Project						
Impact Number	**Impact**	**Mitigation Measures**		**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
			Development Department and City Engineer. A Letter of Map Revision (LOMR) from FEMA shall be provided to the City Engineer prior to acceptance of grading permits as complete.			
Chapter 4.9 – Noise						
4.9-1	Generation of a substantial temporary increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	*4.9-1(a)*	*Prior to the approval of grading and/or building permits, or any permit that results in the use of construction equipment, the following requirements shall be noted on Improvement Plans, subject to review and approval of the City of Elk Grove Community Development Department:* • *Construction activities (excluding activities that would result in a safety concern to the public or construction workers) shall be limited to between the hours of 7:00 AM and 7:00 PM, daily, when located in close proximity to residential uses;* • *All construction equipment powered by internal-combustion engines shall be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with the manufacturer's recommendations. Equipment engine shrouds shall be closed during equipment operation;* • *When not in use, motorized*	City of Elk Grove Community Development Department:	Prior to the approval of grading and/or building permits, or any permit that results in the use of construction equipment	

MITIGATION MONITORING AND REPORTING PROGRAM Summer Villas Special Planning Area Project						
Impact Number	**Impact**	**Mitigation Measures**		**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
			construction equipment shall not be left idling for more than five minutes; • *All stationary noise-generating construction equipment, such as generators or air compressors, are to be located as far as practical from existing residences. In addition, the Project contractor shall place such stationary construction equipment so that emitted noise is directed away from sensitive receptors nearest to the site; and* • *The construction contractor shall, to the maximum extent practical, locate on-site equipment staging areas to maximize the distance between construction-related noise sources and noise-sensitive receptors nearest to the site during all Project construction.*			
		4.9-1(b)	*Prior to the approval of grading permits, or permits that would result in the use of construction equipment in an off-site construction area, the Project shall incorporate eight-foot-tall temporary sound barriers along the boundary of the off-site construction area adjacent to the existing sensitive receptors.* *The sound barrier fencing shall consist of 0.5-inch plywood or minimum Sound*	City of Elk Grove Community Development Department	Prior to the approval of grading permits, or permits that would result in the use of construction equipment in an off-site construction area	

MITIGATION MONITORING AND REPORTING PROGRAM Summer Villas Special Planning Area Project						
Impact Number	**Impact**	**Mitigation Measures**		**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
			Transmission Class (STC) 27 sound curtains placed to shield nearby sensitive receptors. The plywood barrier shall be free from gaps, openings, or penetrations to ensure maximum performance. The requirements of the temporary sound barriers shall be noted on Improvement Plans, subject to review and approval of the City of Elk Grove Community Development Department.			
Chapter 4.11 – Transportation						
4.11-1	Conflict with a program, plan, ordinance, or policy, except LOS, addressing the circulation system during construction activities.	*4.11-1*	*The Improvement Plans shall include a striping and signing plan and shall include all on- and off-site traffic control devices. Prior to the commencement of construction, a construction signing and traffic control plan shall be provided to the City of Elk Grove Community Development Department for review and approval. The construction signing and traffic control plan shall include (but not be limited to) items such as:* • *Estimate of the number and size of trucks per day entering and leaving the site;* • *Identification of arrival/departure times that would minimize traffic impacts;* • *Approved truck circulation patterns;* • *Locations of staging areas;* • *Locations of employee parking and methods to encourage carpooling*	City of Elk Grove Community Development Department	Prior to Improvement Plan approval and prior to the commencement of construction	

MITIGATION MONITORING AND REPORTING PROGRAM Summer Villas Special Planning Area Project					
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		and use of alternative transportation; • *Methods for partial/complete street closures (e.g., timing, signage, location and duration restrictions);* • *Criteria for use of flaggers and other traffic controls;* • *Preservation of safe and convenient passage for bicyclists and pedestrians through/around construction areas;* • *Monitoring for roadbed damage and timing for completing repairs;* • *Limitations on construction activity during peak/holiday weekends and special events;* • *Preservation of emergency vehicle access;* • *Removing traffic obstructions during emergency evacuation events; and* • *Providing a point of contact for City residents and guests to obtain construction information, have questions answered, and convey complaints.* *The construction signing and traffic control plan shall be developed such that the following minimum set of performance standards is achieved throughout Project construction. It is anticipated that additional performance standards would be developed*			

MITIGATION MONITORING AND REPORTING PROGRAM Summer Villas Special Planning Area Project						
Impact Number	**Impact**	**Mitigation Measures**		**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		once details of Project construction are better known. • *All construction employees shall park in designated lots owned by the Project applicant or on private lots otherwise arranged for by the Project applicant.* • *Roadways shall be maintained clear of debris (e.g., rocks) that could otherwise impede travel and impact public safety.*				
4.11-2	Conflict with a program, plan, ordinance, or policy, except LOS, addressing roadway bicycle and pedestrian facilities during operations.	*4.11-2*	*As part of approval of subsequent development plans, the City shall condition the future Tentative Maps to include the following pedestrian and bicycle facility infrastructure:* • *The Project shall construct Class II bicycle facilities along the Project frontage on Sheldon Road between Waterman Road and Bradshaw Road.* • *The Project shall construct a Class I multi-use path along the Project frontage on Sheldon Road between Waterman Road and Bradshaw Road.* • *The Project shall contribute to the planned development of the Class I multi-use path along Waterman Road between Bond Road and Calvine Road and along Sheldon*	City of Elk Grove Community Development Department	Prior to approval of future tentative maps	

MITIGATION MONITORING AND REPORTING PROGRAM Summer Villas Special Planning Area Project						
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			Road between Elk Grove Florin and Waterman Road. *Completing gaps in the bicycle system could be addressed through the City's Active Transportation impact fee program or, alternatively, through a standalone in-lieu fee analysis to determine the Project's responsibility for funding system improvements in the surrounding area.*			
4.11-3	Conflict with a program, plan, ordinance, or policy, except LOS, addressing transit facilities and services during operations.	*4.11-3(a)* *4.11-3(b)*	*Implement Mitigation Measure 4.11-4.* *Any subsequent Tentative Subdivision Map shall be conditioned to construct one or more bus stops with shelters within the Project for access to transit services. Such facilities shall be constructed as part of the corresponding civil improvement plans.* *The Project applicant shall pay the City's Capital Facilities Fee for Transit, which shall fund new transit shelters, a portion of the cost for extension of Light Rail/Bus Rapid Transit to Elk Grove, and other transit improvements in the community and at the site. The fee shall be paid, consistent with the provisions of the adopted Nexus Study, in conjunction with building permit issuance or final occupancy, consistent with State law. Any credits or reimbursement eligible to the Project as a result of construction of these facilities shall be provided consistent with*	See Mitigation Measure 4.11-4 City of Elk Grove Community Development Department	See Mitigation Measure 4.11-4 In conjunction with building permit issuance or final occupancy	

MITIGATION MONITORING AND REPORTING PROGRAM Summer Villas Special Planning Area Project						
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			the Nexus Study and applicable City policies.			
4.11-4	Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).	*4.11-4*	*Prior to the recordation of the first Final Map, the property owner(s) shall: (1) approve (a) the formation of a new or annexation into an existing community facilities district (CFD) and (b) an annual CFD special tax; or (2) deposit a sum money, as determined by the City, to fund the Project's fair share portion of the costs of providing pedestrian and bicycle facility improvements, transit services and infrastructure, and community based travel planning (CBTP) and assistance. The funds may go towards education services, improvement or extension of transit services or additional on-demand transit, or physical improvement and maintenance for pedestrian and bicycle infrastructure and programs. The CFD funds may be used to fund and implement necessary improvements to transit stop amenities (i.e., shelters) near the Project to ensure transit stops are adequate to accommodate new transit riders generated by the Project. Proof of compliance shall be submitted to the City of Elk Grove Community Development Department for review and approval.* *Any costs for the formation of the new or annexation into an existing CFD, and approval of such annual CFD special taxes, or administration of the sum of money deposited to fund the City's costs of*	City of Elk Grove Community Development Department	Prior to the recordation of the first Final Map	

MITIGATION MONITORING AND REPORTING PROGRAM Summer Villas Special Planning Area Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		providing pedestrian and bicycle facility improvements, transit services, or CBTP, shall be paid from the annual CFD special taxes or the sum of money deposited with the City. If the property owner(s) fails to approve an annual CFD special tax or deposit a sum of money as provided for herein for such purposes for the City, no building permits shall be issued and no Final Map shall be recorded.			

Appendix A

Memorandum

To: Bryan Wilson, Gyan Kalwani, and Matt Keasling

From: Amy Lapin and Emilio Balingit, Economic & Planning Systems, Inc.

Subject: Development Feasibility Analysis of Summer Villas and Comparison Sites in the Rural Area of Elk Grove; EPS #262053

Date: July 30, 2026

Introduction

This memorandum details the results of a development feasibility analysis for the proposed Summer Villas development (Project) in the City of Elk Grove (City). The Project requires a General Plan Amendment (GPA) and rezone of approximately 116 acres of land in southeastern Elk Grove to permit up to 499 active-adult age-restricted dwelling units. The Project would also allow a private clubhouse and recreation center, private parks, and open space along Laguna Creek and Waterman Road.

The Project is located at the intersection of Waterman Road and Sheldon Road in the Sheldon/Rural Area (Rural Area) of the City of Elk Grove (City), as shown in **Figure 1**. The General Plan designates the Project site and much of the surrounding parcels as Rural Residential. The area to the east and west of the project is largely rural and agricultural in nature and permits limited residential development (minimum lot sizes of 1, 2, or 5 acres). However, the Project is adjacent to an area of the City zoned for low-density residential. The Elliott Springs Special Planning Area (Elliott Springs SPA), located to the southwest of the Project at the intersection of Waterman Road and Bond Road, is approved and includes both standard single-family homes and an age-restricted component.[1] [2]

The proposed GPA and rezone would change the Project site's designation from Rural Residential to a designation permitting active-adult age-restricted development at urban densities, representing a departure from the existing rural land use designation. There are concerns that approval of this request could lead to further development at similar

[1] City of Elk Grove, Resolution No. 2025-143, adopting an Addendum to the Silverado Village Environmental Impact Report and approving the Elliott Springs Village 3 Project (PLNG24-051), July 23, 2025, https://elkgrove.gov/sites/default/files/city-files/City%20Government/City%20Clerk/Resolutions/2025/07-23-25-8-2-2025-143.pdf [accessed July 2026].

[2] City of Elk Grove, Ordinance No. 17-2025, approving the Second Amended and Restated Development Agreement for Elliott Springs (formerly Silverado Village) (EG-11-046), August 13, 2025, https://elkgrove.gov/sites/default/files/city-files/City%20Government/City%20Clerk/city-council-2025/Attachments/08-13-25-7-6.pdf [accessed July 2026].

densities near the Project, altering the rural nature of the community. Accordingly, this analysis first assesses the financial feasibility of the Project as proposed, then tests whether development at similar densities would be financially feasible on five other potential development sites in the Rural Area (referred to as the Comparison Sites, the location of each site is shown in **Figure 6** later in this memorandum), in order to evaluate the potential for the Project to set a precedent for further development in the area.

To conduct the analysis, EPS relied on standard assumptions for residential construction, site development, and financing costs, which are informed by interviews with production homebuilders and third-party cost estimating sources. Additionally, EPS incorporated cost estimates prepared by engineering firm Wood Rodgers, Inc. for offsite water and sewer extensions required to serve the Project. Lastly, home sale prices and characteristics of the proposed homes (square footage, garage size, etc.) were provided by the Project applicant. It is important to note that these costs and revenues are planning-level estimates and that the true cost of infrastructure and residential construction for the Project may differ from these estimates. However, these costs are applied to both the Project feasibility assessment and the feasibility assessments of the Comparison Sites – as such, the feasibility assessment and resulting residual land values are best viewed as relative, order-of-magnitude assessments rather than true assessments of market value.

Figure 1. Project Context and City of Elk Grove General Plan Land Use Designations

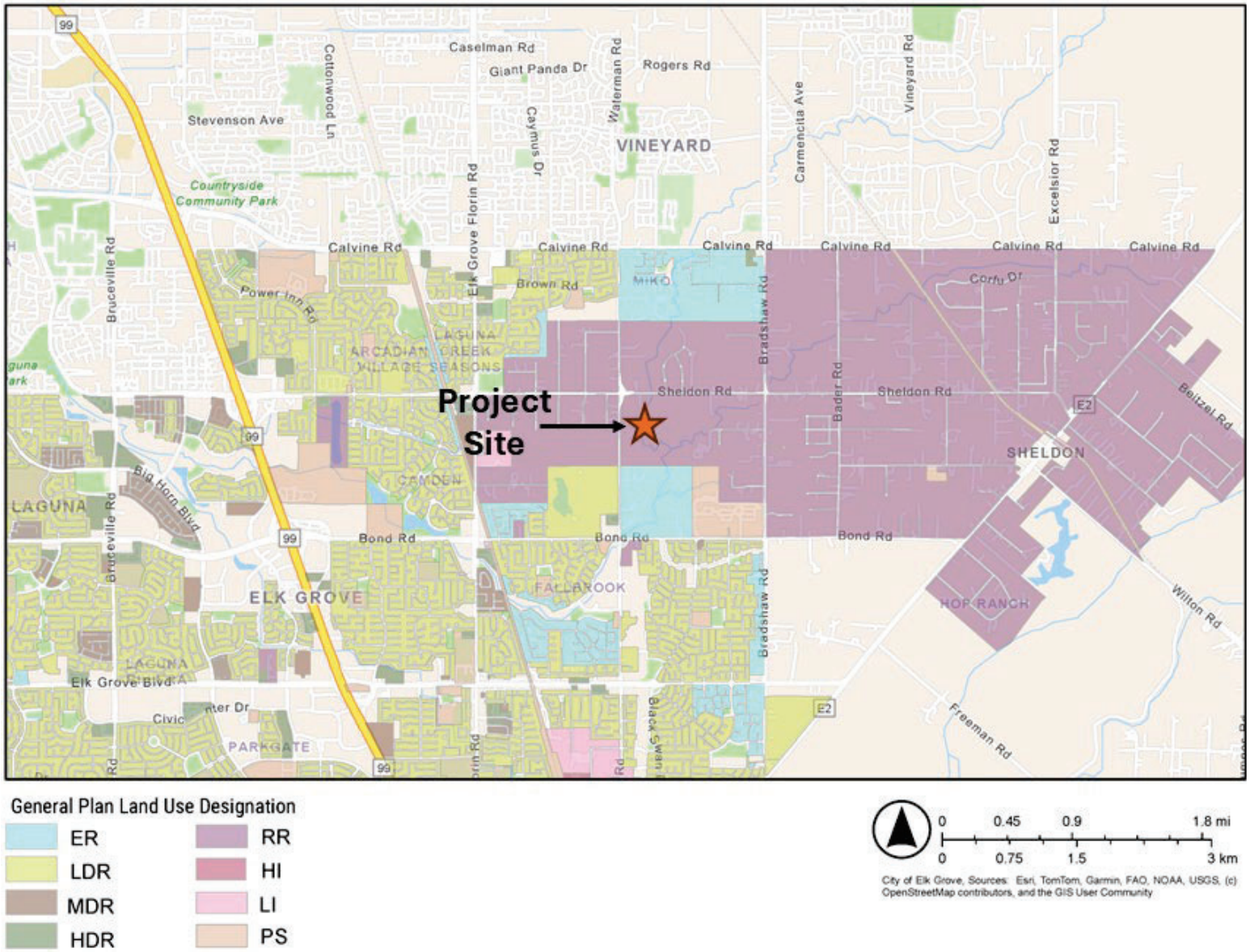


*Figure not OCR Compatible.

Key Findings

This analysis evaluated the financial feasibility of the Project, as well as the potential for similar development on other parcels in the Rural Area. **Table 1** summarizes the feasibility findings for the Project and each comparison site. The feasibility analysis results are based on the specific land use assumptions and conservative cost and revenue inputs described in further detail in the ***Feasibility Analysis*** subsection below – changes to these assumptions and inputs could change the results of the assessment.

- **Market demand for active-adult housing in the region is strong and growing**. The 55+ population in the Sacramento MSA has grown significantly faster than the rest of the population over the past 15 years, and demand indicators, including high occupancy rates and increasing quarterly absorption in Sacramento County, point to continued need for new supply.
- **The Project is financially feasible, though by a modest margin**. Its estimated RLV of approximately $190,000 per acre falls within the range of comparable undeveloped land sales in the Sacramento region, supporting the Project's viability at its proposed scale and location.
- **By contrast, none of the five Comparison Sites in the Rural Area are estimated to be financially feasible, each returning a negative RLV**. Their smaller size limits the sales revenue available to recoup fixed costs, and their greater distance from existing utility connections increases the cost of the offsite infrastructure required to serve them.
- **These findings indicate that the Project's feasibility is specific to its scale and location and would not be expected to extend to other parcels in the area.** Even under assumptions that allowed the Comparison Sites to tie into the sewer line the Project would construct, their smaller size and distance from existing infrastructure still result in negative RLVs.

Memorandum Organization

After this **Introduction** section, the remainder of the memorandum is organized as follows:

- **Key Findings** section provides a summary of the results of the market assessment and feasibility analyses
- **Residential Market Overview** section details the market support for active-adult units in the Sacramento Region and the City of Elk Grove
- **Project Feasibility Analyses** section describes the methodology for performing the feasibility assessments and further discussion of the results.

The following Appendices are also provided for further detail:

- **Appendix A** provides the detailed feasibility assessments for both the Project and Comparison Sites.
- **Appendix B** provides supporting detail for the feasibility assessments, including cost and revenue assumptions and methodology for estimating development potential on the Comparison Sites.

Table 1. Feasibility Assessment Summary of Project and Comparison Sites

Site No.	Site Description	Site Acres	Total Units	Infrastructure Costs per Unit	Residual Land Value (RLV) [2]	RLV/ Acre	Feasibility Assessment [1]
Project	**Summer Villas**	**71.3**	**499**	**$12,453**	**$13,528,952**	**$189,751**	🟡
1	Country Hill Drive	39.8	265	$23,449	($16,715,582)	($419,512)	🔴
2	Bradshaw Road	34.2	228	$35,340	($130,921)	($3,827)	🔴
3	Bader & Sheldon South	29.6	197	$61,339	($5,968,193)	($201,655)	🔴
4	Bader & Sheldon North	35.6	236	$56,560	($6,176,810)	($173,659)	🔴
5	Calvine Road	19.4	129	$103,512	($12,239,161)	($630,547)	🔴

Source: Summer Villas; Wood Rodgers, Inc.; EPS.

[1] Static residual land value feasibility analysis benchmarks generally reflect the indicators shown below.
- 🟢 **Likely to be Feasible**: RLV/Acre greater than $250,000
- 🟡 **May be Feasible**: RLV/Acre between $100,000 and $250,000
- 🔴 **Likely to be Infeasible**: RLV/Acre less than $100,000

[2] Residual Land Value (RLV) is the maximum price a developer can pay for land while still achieving a target profit, calculated by subtracting all development costs (construction, fees, financing, and profit) from the projected development value.

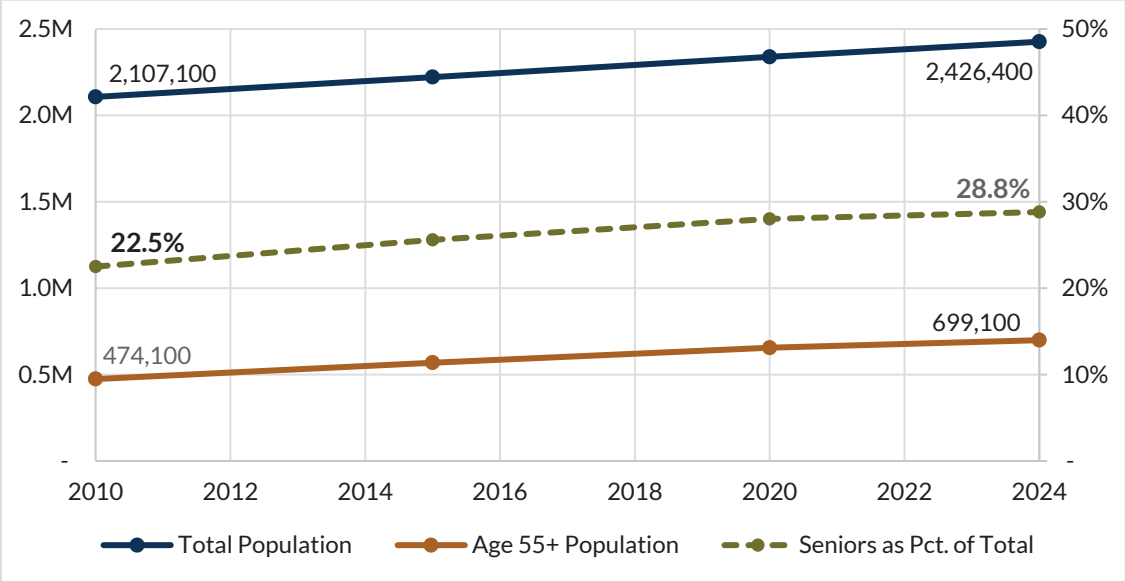
Residential Market Overview

Socioeconomic Overview

Regional Population Growth

The Sacramento region's population is growing, and an increasingly larger share qualifies for active adult housing.[3] Since 2010, the Sacramento MSA's population grew by 319,000, while the 55+ population grew by 225,000, representing 70 percent of the total growth. Seniors comprised 22 percent of the regional's population in 2010 and grew to a 29 percent share in 2024, per the U.S. Census American Community Survey.

Figure 2. Total and 55+ Population (Sacramento-Roseville-Folsom MSA)



Source: U.S. Census American Community Survey 5-Year Estimates.

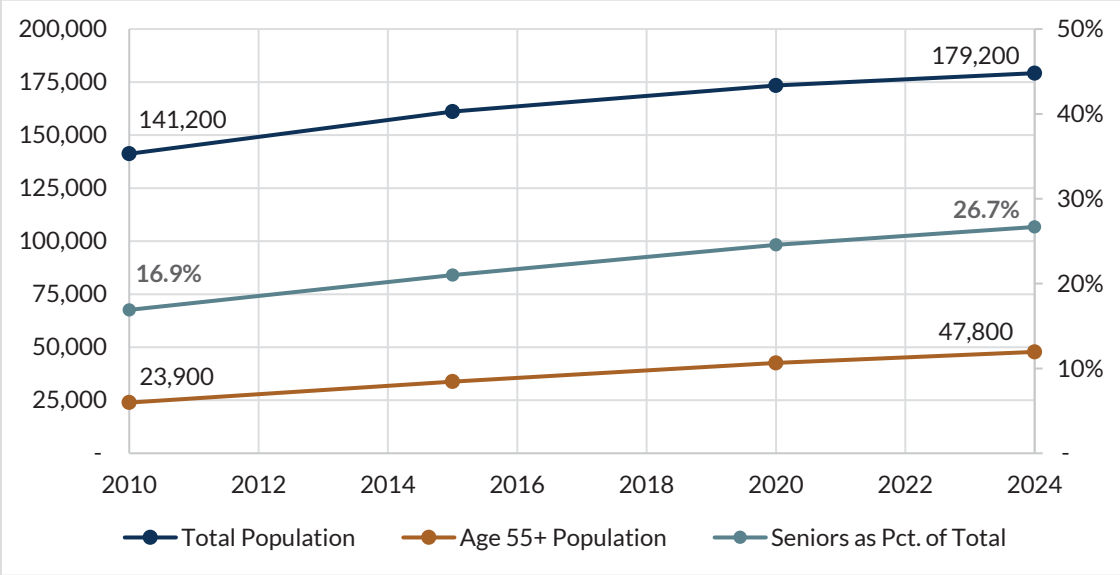
The Sacramento metropolitan area (Sacramento-Roseville-Folsom MSA) is the top target of people moving from the City of San Francisco—further, Elk Grove was among the state's ten fastest growing cities in 2025 by population.[4,5] Similar to the rest of the region, much of the City's growth has been in the 55+ population, which doubled between 2010 and 2024.

[3] Defined as residents aged 55 and older.

[4] Redfin, *"Sacramento Housing Market,"* accessed May 26, 2026, https://www.redfin.com/city/16409/CA/Sacramento/housing-market#migration [accessed July 2026].

[5] Per the California Department of Finance, as reported by: Abridged, *"Sacramento Region Has Some of the Highest Population Growth in California, New Data Shows,"* May 1, 2026, https://www.abridged.org/news/sacramento-region-growing-new-state-data/ [accessed July 2026].

Figure 3. Total and Age 55+ Population (City of Elk Grove)



Demand for Active Adult Housing

Demand indicators are strong for age-restricted communities nationally. Stabilized properties averaged over 95 percent occupancy in 2025, with all properties averaging 93 percent.[6] As the senior population has grown, so has its influence on the housing market. In 2010, the median age of a homebuyer was 39; at the end of 2025, the median homebuyer age had increased to 59.[7] The rising median age of homebuyers reflects the growing size of the senior population, along with other factors such as home price escalation, home equity accumulation among existing owners, interest rates, and job market conditions, several of which accelerated during the pandemic.[8]

Over three quarters of age-55+ households in the Sacramento MSA are homeowners (**Figure 2**), and they occupy 55 percent of the region's owner-occupied homes (**Figure 3**; 314,600 of 572,800 owner-occupied homes).

[6] Includes properties that have been open for under two years, per: National Investment Center for Seniors Housing & Care (NIC), *"Active Adult Rental Communities: Data Dive,"* June 18, 2025, https://www.nic.org/blog/active-adult-rental-communities-data-dive/ [accessed July 2026].

[7] National Association of Realtors, "2025 Profile of Home Buyers and Sellers," November 4, 2025, https://www.nar.realtor/press-releases/first-time-home-buyer-share-falls-to-historic-low-of-21-median-age-rises-to-40 [accessed July 2026].

[8] Jackson, Anna-Louise. 2026. America's first-time homebuyer is now 40 years old. A shocking new report explains why. FastCompany. Available at: https://www.fastcompany.com/91561247/americas-first-time-homebuyer-40-years-old-a-shocking-new-report-explains-why . [accessed July 2026].

Figure 4. Housing Tenure by Age of Householder (Sacramento MSA)

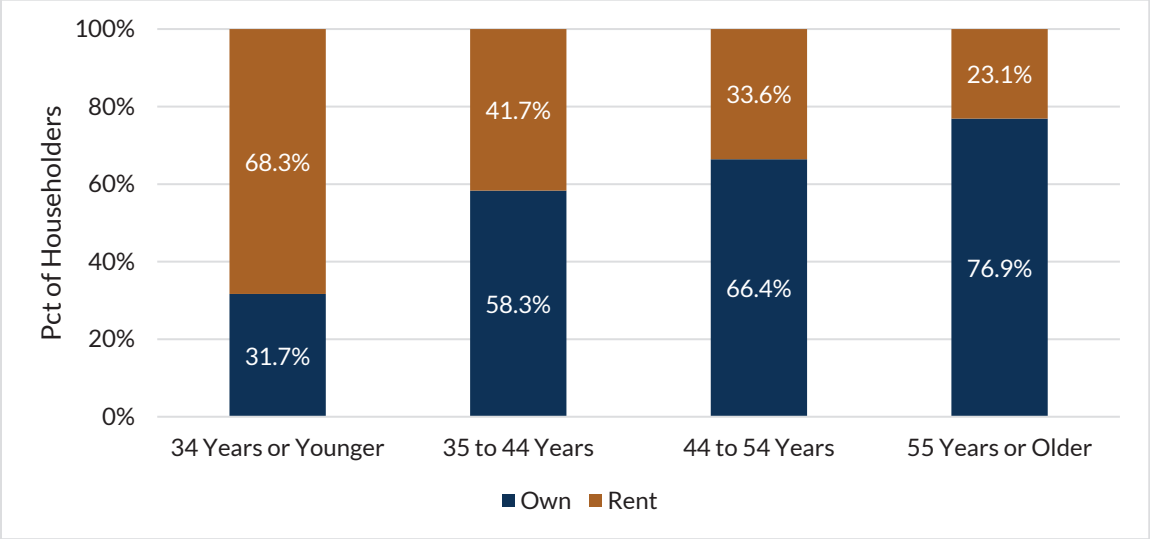
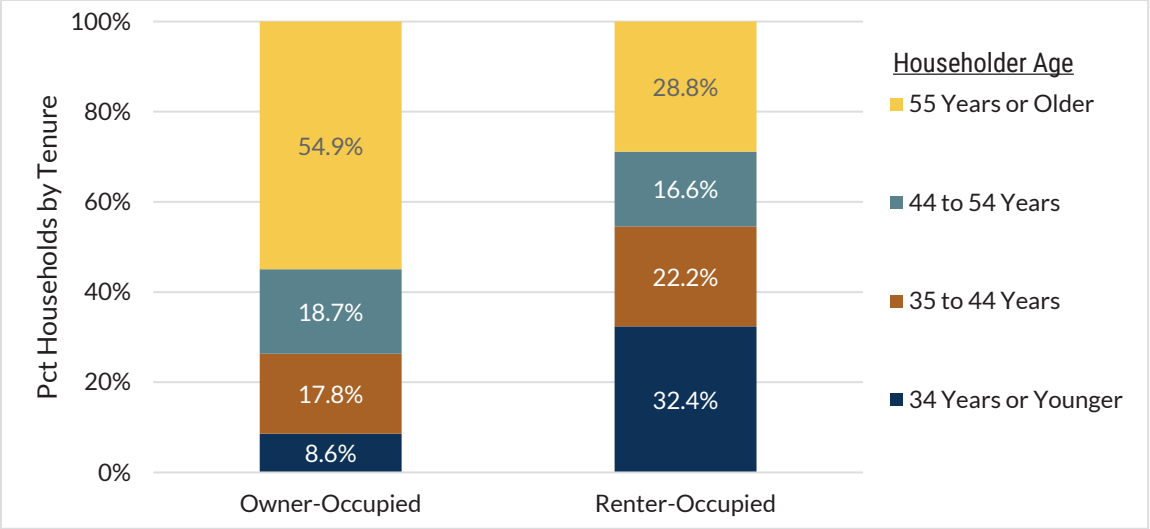
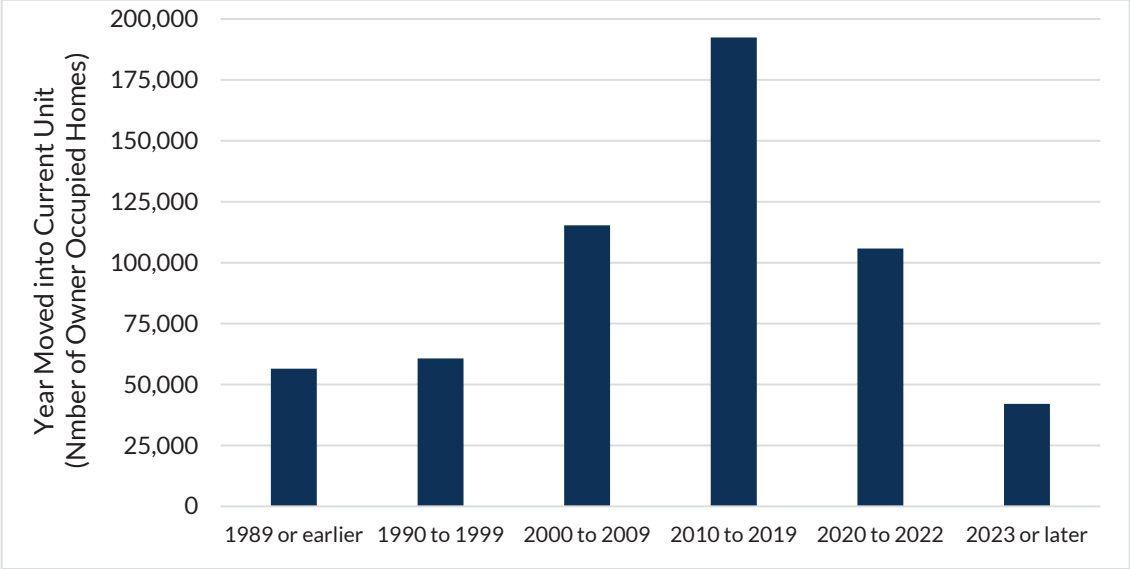


Figure 5. Share of Total Owner/Renter Households by Age of Householder (Sacramento MSA)



Of the 572,800 Sacramento MSA households who own their home, 40 percent have been there since at least 2009. From 2009 to current day, home values in the Sacramento MSA have grown at twice the rate of inflation. Based on the Zillow Home Value Index, Sacramento MSA homes are worth 121 percent of their mid-2009 value (as of May 2026), while the Western Region Consumer Price Index is up 59 percent since then. Many of these homeowners are likely well-positioned to leverage their existing home equity toward a new home purchase.

Figure 6. Year Householder Moved Into Current Unit (Sacramento MSA)



Competitive Supply

Regional Age-Restricted Housing Market Activity

Over the past year (April 2025 through March 2026), 302 new age-restricted homes across 4 different subdivisions sold in Sacramento County, according to data from the Gregory Group. As shown in **Table 2**, Folsom and Rancho Cordova accounted for the majority of these sales, with Elk Grove accounting for 65 sales. Since the second quarter of 2025, the number of homes sold in Sacramento County has increased in each quarter, from 54 in 2025 Q2 to 108 in 2026 Q1.

These homes typically average around 2,000 square feet on 5,000 square-foot lots and sell for an average of $628,000. Of the sales captured in the Gregory Group data, unit sizes ranged from roughly 1,300 to 2,979 square feet. Sale prices ranged from $407,000 for the smallest unit, in the Four Seasons development in Rancho Cordova, to a high of $906,000 recorded for a 2,440-square-foot unit in Folsom Ranch. See **Table 2** below for more detail on recent, average sales for age-restricted homes in Sacramento County.

Table 2. Recent Sales of Age-Restricted Homes in Sacramento County (2025 Q2 – 2026 Q1)

Location	Averages				Total Units Sold
	Lot Size	Home Size	Base Price	Price PSF	
12-Month Period Ending March 30, 2026					
Folsom	4,758	1,865	$728,095	$393	132
Galt	5,000	1,796	$545,377	$305	22
Elk Grove	5,346	2,288	$682,523	$301	65
Rancho Cordova	4,916	1,960	$559,566	$290	83
Total/Average	**5,005**	**1,977**	**$628,890**	**$322**	**302**
2026 Q1					
Folsom	4,758	1,865	$728,395	$393	37
Galt	5,000	1,796	$546,719	$306	8
Elk Grove	5,384	2,267	$680,999	$304	24
Rancho Cordova	4,916	1,960	$515,276	$268	39
Total/Average	**5,015**	**1,972**	**$617,847**	**$318**	**108**
2025 Q4					
Folsom	4,758	1,865	$727,995	$393	37
Galt	5,000	1,796	$546,719	$306	5
Elk Grove	5,384	2,267	$680,454	$304	17
Rancho Cordova	4,916	1,960	$548,061	$284	14
Total/Average	**5,015**	**1,972**	**$625,807**	**$322**	**73**
2025 Q3					
Folsom	4,758	1,865	$727,995	$393	32
Galt	5,000	1,796	$546,719	$306	3
Elk Grove	5,305	2,311	$684,499	$299	13
Rancho Cordova	4,916	1,960	$577,440	$299	19
Total/Average	**4,995**	**1,983**	**$634,163**	**$324**	**67**
2025 Q2					
Folsom	4,758	1,865	$727,995	$393	26
Galt	5,000	1,796	$541,353	$303	6
Elk Grove	5,305	2,311	$684,499	$299	11
Rancho Cordova	4,916	1,960	$597,489	$311	11
Total/Average	**4,995**	**1,983**	**$637,834**	**$326**	**54**

Source: The Gregory Group; EPS.

Elk Grove Active Adult Communities

The City's most recent age-restricted developments are Esplanade at Madeira Ranch (construction began in 2024; 639 total units), Del Webb Glenbrooke (construction began in 2007; 631 units), and Heritage Lakeside (construction began in 2001; 269 units). Of these three projects, only Esplanade is unfinished. As of June 2026, approximately 156 of the 290 planned units at Esplanade had sold. At the current sales rate of approximately 15 homes per quarter, homes in Esplanade will likely be sold out by the end of 2028 at the latest.

In addition, Elliott Springs Village 3, an age-restricted village within the Elliott Springs SPA, consists of 282 active-adult patio homes and up to 110 units of independent living, assisted living, or memory care; as of this writing, no sales timeline for these age-restricted units has been announced.

Of the 1,506 total units in the three projects, the average list price for those active on the market (new homes and resales, current as of May 26, 2026) is $642,000. Units currently on the market range from about 1,260 to 2,980 square feet, with an average size of about 1,900 square feet.

List prices per square foot range from $293 to $398, roughly comparable to new construction active-adult sales in Galt, Rancho Cordova, and Folsom, which range from $284 to $393 per square foot. See **Table 3** below for a summary of the active market for age-restricted units in Elk Grove.

Table 3. Active Listings of Age-Restricted Homes in Elk Grove (as of May 26, 2026)

Item	Del Webb Glenbrooke	Esplanade at Madeira Ranch	Heritage Lakeside	Total/Average
Location	Southern/ Central Elk Grove	Southern Elk Grove	Laguna West	
Construction Start	2007	2024	2001	**2011**
Units at Buildout	639	291	269	**1,199**
Unit Size (sq ft)				
Range	1,257 - 2,252	1,522 - 2,979	1,694 - 2,713	**1,257-2,979**
Average	1,627	2,035	2,204	**1,907**
List Price per Unit				
Range	$500 - $700k	$520 - $950k	$565k - $1M	**$500k - $1M**
Average	$572,000	$660,000	$782,000	**$642,000**
List Price per Square Foot				
Range	$337 - $400	$293 - $358	$333 - $368	**$260 - $400**
Average	$357	$328	$351	**$345**

Source: Witham Real Estate; Taylor Morrison; Zillow; EPS.

Absorption and Pricing

As shown in **Table 2**, the average active adult home in the Sacramento region developed over the past year was approximately 2,000 square feet with a sales price of approximately $630,000, or about $320 per square foot. In Elk Grove, one development, Esplanade at Madeira Ranch, is currently selling new construction active-adult homes. EPS also examined resale listings at two other completed developments as shown in **Table 3**: Glenbrooke by Del Webb and Heritage Lakeside by Lennar, initiated in 2007 and 2001 respectively. Notably, the per square foot sales price at the older developments is higher than the new construction development at Esplanade at Madeira Ranch. While this price

distinction could reflect differences in home quality between the developments, it also suggests that there is still unmet demand for active-adult developments in Elk Grove, as buyers appear willing to pay a premium for older product rather than wait for, or forgo, active-adult housing altogether.

Feasibility Analysis

This section of the memorandum describes EPS's analysis of the Project's financial feasibility, as examined by a "static" pro forma. This pro forma compares the costs to develop the Project with the revenues (via home sales) that the developer would expect to receive from it. The results of this analysis allow EPS to estimate a residual land value (RLV), which is the highest land cost that would still allow the Project to be feasible given the assumptions in the pro forma. For the purposes of this analysis, EPS placed each site (the Project site and the five Comparison Sites) into one of three feasibility categories based on the RLV:

- **Likely to be Feasible**: RLV/Acre greater than $250,000
- **May be Feasible**: RLV/Acre between $100,000 and $250,000
- **Likely to be Infeasible**: RLV/Acre less than $100,000

The higher the RLV, the more likely a project is to be feasible. Additionally, this analysis also considers the RLV per-acre as a benchmark. If a given project's RLV per acre is higher than the prevailing per-acre price for similar land, the site is more likely to develop. In the Sacramento region, typical unfinished land values for single-family residential development range from $130,000 to approximately $400,000 per acre.[9] When projects are not feasible, the pro forma analysis may return either very low or negative RLV.

As shown in **Table 1**, the Project site has an RLV of approximately $190,000 per acre, near the upper end of the "May be Feasible" range. No other site examined had a positive RLV. This dynamic is driven by two interrelated factors: 1) offsite infrastructure costs and 2) overall development capacity, which is driven by parcel size.

As both the Project site and the Comparison Sites are in the Rural Area, they lack access to municipal water and sewer service and instead are served by wells and septic systems. While these systems may function for very low density rural residential uses typical of the Rural Area, higher-intensity development such as that proposed by the Project requires connection to municipal water supplies and sewer service. For much of the Rural Area, this extension of utility infrastructure poses a significant financial challenge.

While the Project site also requires offsite infrastructure investments, the large area relative to the other potentially developable parcels examined results in a much larger

[9]Unfinished lots do not have utilities at the site. Prices for land that is zoned for residential development are generally higher. See **Table B-18** for a summary of residential land sales in the Sacramento region.

development capacity. The Project's 71 developable acres can contain up to 499 dwelling units, while no other site can hold more than 265 units. Even if offsite infrastructure costs for the Comparison Sites were the same as the costs for the Project site, the lower number of units on the Comparison Sites results in a much higher infrastructure cost per unit.

As shown in **Table 1**, the Project would require approximately $12,500 in offsite infrastructure costs per unit, while the other Comparison Sites would require between $23,450 and $103,500 per unit.

In addition to the smaller size of the Comparison Sites increasing the infrastructure cost per-unit, many of the sites would require more extensive offsite infrastructure construction to connect to municipal water and sewer service. As described in the Summer Villas EIR (page 3-16), a potential sewer tie-in exists at the intersection of Sheldon Road and Elk Grove Florin road to the west of the Project.[10]

As shown in **Figure 6**, the Project site is the second closest site to the municipal sewer tie-in at Sheldon Road, while other Comparison Sites would require much longer offsite sewer runs to reach a connection point, even if the connection point is at the Project's frontage with Sheldon Road. Similarly, the Summer Villas EIR (Page 3-18) describes existing potable water mains running east-west along Bond Road and Calvine Road.[11] In order to connect to potable water service, the Comparison Sites would also have to create loops to connect those mains along Bond and Calvine Roads, while the Project benefits from an existing main under Waterman Road at the southern edge of the parcel.

[10] Draft Environmental Impact Report for Summer Villas Special Planning Area Project. Prepared by Raney Environmental for the City of Elk Grove. October 2025. Available at: https://elkgrove.gov/sites/default/files/city-files/archive/departments/planning/environmental-review/archive-summer-villas-spa-draft-eir.pdf . [Accessed July 2025].

[11] Ibid.

Figure 7. Project and Comparison Sites Location

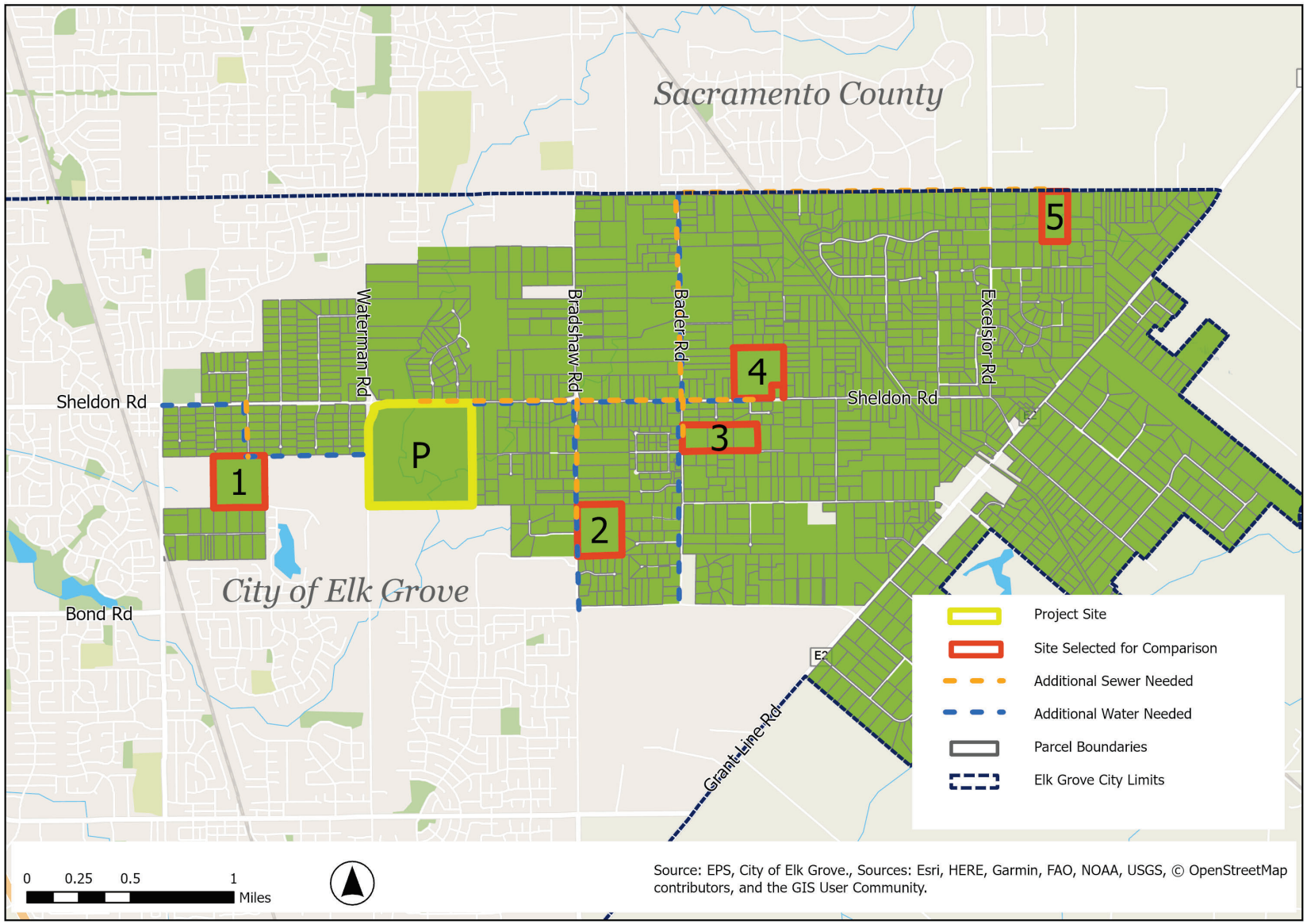


*Figure not OCR Compatible.

Pro Forma Assumptions

In order to estimate the costs and revenues associated with the development of the Project site, EPS used the following assumptions:

- Project land use assumptions of 499 active-adult units on 71.3 net acres (density of 7.0 units per acre) were obtained from the October 2025 Summer Villas SPA provided by the Project applicant.
- The composition of units by unit type (large-lot detached, small-lot detached, and attached duets) was provided by the applicant.
- Estimated sales prices were initially provided by the applicant, then corroborated against market research from the Gregory Group (see **Table 2** and **Table 3**) and revised where warranted, before being converted to per-square-foot sales prices. EPS assumes that only interior square footage is applied to the total per-square-foot sales revenue, while garage square footage is excluded from these sales revenues. **See Table B-2**.
- Direct hard construction costs, soft costs, financing costs, and builder fees were estimated by EPS, based on interviews with production home builders and third-party cost estimating sources. **See Table B-2**.
- Offsite infrastructure costs for the Project prepared by Wood Rodgers. See **Table B-7**. This information was also used to estimate unit prices and quantities for the Comparison Sites.
- Clubhouse size, floor-area-ratio, and parking ratios were estimated based on EPS review of clubhouses at similar active-adult developments in the Sacramento Area. **See Table B-4**.
- Building permit processing and development impact fee estimates were prepared by EPS from publicly-available fee data provided by the City and various agencies that would serve the Project. See **Table B-8** through **Table B-17**.

For the pro forma analysis of each Comparison Site, EPS developed similar residential and clubhouse land use programs at similar densities to the Project and applied the same per-square-foot sales prices and construction costs used for the Project, adjusted only for differences in unit counts, clubhouse size, and offsite infrastructure costs, as described below.

Offsite Infrastructure Assumptions

Because offsite infrastructures costs are a significant portion of overall costs for the Project, EPS estimated offsite infrastructure costs for the Comparison Sites. These estimates are shown in detail in **Table B-5**. Using the offsite infrastructure cost estimates prepared by Wood Rodgers, Inc. for the Project, EPS scaled these costs proportionately based on the estimated linear feet of sewer and water line that would need to be

constructed to serve the Comparison Sites. However, some costs, such as the sewer lift station and traffic control, are assumed to be identical for each project. These cost assumptions are shown in **Table B-6**. While this method of preparing cost estimates for the Comparison Sites is intended to provide an order-of-magnitude approximation rather than a precise estimate, EPS' methodology and results were reviewed by Wood Rodgers, Inc., who indicated that the EPS methodology for estimating off-site infrastructure routes does not take into account the actual capacity of the existing infrastructure at the proposed tie-in locations for the Comparison Sites and thus the cost estimates likely represent a conservative, low-end approximation of the true infrastructure costs for the Comparison Sites.

For the purposes of estimating linear feet of sewer line, EPS assumed that development on the Comparison Sites could tie into a sewer line that would be constructed by the Summer Villas Project, while water lines would have to loop into water mains at Bond and Calvine Roads. Using the unit prices provided by Wood Rodgers, Inc. and scaling certain costs according to the linear feet of water and sewer line required, EPS then estimated the total cost for each site.

Project Feasibility Analysis Results

As shown in **Table A-1**, the estimated revenues from home sales exceed the total development costs by approximately $13.5 million – this is the calculated RLV for the project. Dividing by the Project's 71.3 acres results in a RLV of approximately $190,000 per acre. Comparable sales of undeveloped land in the Sacramento Region ranged from $130,000 to $394,000, placing the Project's RLV within, but below the midpoint, of this range.

Feasibility Analysis of Surrounding Rural Parcels

To test the feasibility of further development in the Rural Area, EPS identified other parcels in the Rural Area that could potentially develop into residential development projects with similar densities to the proposed Project. EPS used parcel data from the Sacramento County Assessor (via ParcelQuest, a third-party database compiled from public County records) to identify parcels with the following characteristics:

- Greater than 20 acres of developable area. Utility easements, such as the electrical transmission lines running adjacent to Waterman Road, and natural constraints, such as Laguna Creek, were considered to restrict developable area.
- Direct access to a public road (i.e., not requiring access through an adjacent parcel or private roadway).
- No more than one existing dwelling unit.
- A County Assessor-assigned land use of one of the following:
    - Rural homesite;
    - Single-family home;
    - Agricultural; or
    - Vacant land
- Potential for assemblage of adjacent parcels to create 20 or more developable acres was also considered if all parcels were owned by the same owner and all parcels met the criteria above (only one access to public roadway required).

EPS then selected five parcels meeting these criteria to test the feasibility of development similar to Summer Villas on these Comparison Sites, which are shown in **Table B-3**. Although one parcel (Parcel 5 along Calvine Road) is smaller than 20 acres, this parcel was selected due to its proximity to a water main in Calvine Road, which reduced its offsite water infrastructure costs compared to other sites. The five sites selected are representative sites and do not represent the full list of parcels in the Rural Area that fit these criteria – other parcels in the Rural Area meet the criteria listed above, but not all sites were tested as they would yield similar results to the sites selected.

In order to create development programs for feasibility testing on these parcels, EPS used development assumptions shown in **Table B-4**. The overall densities and breakdown of units by type are identical to Summer Villas, although the overall number of units scales with parcel size and developable area. The clubhouse size for each Comparison Site was scaled using a ratio of 60 square feet per unit, calculated from the EPS review of clubhouse sizes in other residential subdivisions throughout the Sacramento region.

Based on these development assumptions and the cost and revenue assumptions described previously, none of the Comparison Sites are shown to be feasible, with all Comparison Sites returning negative RLVs.

Conclusions

The feasibility analysis demonstrates that the Project is feasible, though with a modest margin, with an estimated RLV of approximately $190,000 per acre, comparable to sales of other undeveloped land in the Sacramento Region, which ranged from $130,000 to $394,000 per acre. In contrast, none of the five Comparison Sites tested in the Rural Area were shown to be feasible, with all returning negative RLVs. This difference is driven by two key factors: developable acreage and proximity to infrastructure. First, the Project's larger developable area, which spreads offsite infrastructure costs across more units, reduces per-unit infrastructure costs to acceptable levels. Second, its proximity to urban infrastructure including existing sewer and water relative to other parcels in the Rural Area which results in reduced service costs. Together these factors result in the Project's positive RLV while development on the Comparison Sites is rendered infeasible.

These findings indicate that the economics supporting the Project's feasibility are specific to its particular scale and location: because the Comparison Sites are smaller and farther from existing utility connections, they remain financially infeasible under the assumptions tested, and Project approval alone would not be expected to make similar development financially viable elsewhere in the Rural Area.

Separately, any future development in the area would remain subject to its own regulatory approvals, including a General Plan or Rural Area Community Plan Amendment to connect to water or sewer service, a separate City application, CEQA review, and public hearings before City decisionmakers.

Economic & Planning Systems, Inc.
The Economics of Land Use

Appendices

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Feasibility Analysis Pro-Forma

Appendix B
Supporting Tables

Economic & Planning Systems, Inc.
The Economics of Land Use

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Feasibility Analysis Pro-Forma

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Table A-1
Elk Grove Summer Villas
Financial Feasibility Analysis
Feasibility Analysis Pro Forma: Summer Villas Project

Item		Summer Villas
DEVELOPMENT PROGRAM ASSUMPTIONS [1]		
Site Acres	71.30	-
AA Single-Family Detached (60x115)		
No. of Units		160
Avg. Unit Sq. Ft.		2,300
Avg. Garage Sq. Ft.		450
Gross Building Sq. Ft. [2]		440,000
Net Saleable Sq. Ft. [2]		368,000
AA Single-Family Detached (50x110)		
No. of Units		140
Avg. Unit Sq. Ft.		1,900
Avg. Garage Sq. Ft.		450
Gross Building Sq. Ft. [2]		329,000
Net Saleable Sq. Ft. [2]		266,000
AA Single-Family Townhome		
No. of Units/Sq. Ft.		199
Avg. Unit Sq. Ft.		1,500
Avg. Garage Sq. Ft.		400
Gross Building Sq. Ft. [2]		378,100
Net Saleable Sq. Ft. [2]		298,500
Clubhouse		
Bldg Sq. Ft.		30,000
Parking Spaces		188
REVENUE ASSUMPTIONS [3]		
AA Single-Family Detached (60x115) Sales		
Total Potential Sales Revenue		$106,720,000
Less Marketing/Commissions	4.0%	($4,268,800)
Net Total For-Sale Revenue		**$102,451,200**
AA Single-Family Detached (50x110) Sales		
Total Potential Sales Revenue		$85,120,000
Less Marketing/Commissions	4.0%	($3,404,800)
Net Total For-Sale Revenue		**$81,715,200**
AA Single-Family Townhome Sales		
Total Potential Sales Revenue		$110,445,000
Less Marketing/Commissions	4.0%	($4,417,800)
Net Total For-Sale Revenue		**$106,027,200**
TOTAL ESTIMATED REVENUE		**$290,193,600**

Table A-1
Elk Grove Summer Villas
Financial Feasibility Analysis
Feasibility Analysis Pro Forma: Summer Villas Project

Item		Summer Villas
COST ASSUMPTIONS [3]		
Direct Building Construction Costs		
AA Single-Family Detached (60x115)		$52,800,000
AA Single-Family Detached (50x110)		$39,480,000
AA Single-Family Townhome		$56,715,000
Clubhouse		$4,500,000
Total Direct Building Construction Costs		**$153,495,000**
General Site Work		$31,057,613
Existing Building Demolition		-
Parking Construction		
Surface Spaces (Clubhouse)		$1,312,500
Offsite Infrastructure Costs [4]		$10,551,800
Total Direct Construction Costs		**$196,416,913**
Other Costs		
Soft Costs (10% Total Direct Costs)	10.0%	**$19,641,691**
Entitlements (General Plan Amendment + EIR)		**$2,000,000**
Building and Development Impact Fees		
AA Single-Family Detached (60x115)		$10,477,352
AA Single-Family Detached (50x110)		$9,067,549
AA Single-Family Townhome		$11,873,089
Clubhouse		$720,929
Total Building & Development Impact Fees		**$32,138,920**
Financing		
Interest (7.0%, 50% LTC, 50% Outstanding)		$4,343,457
Fees (2.0% of loan amount)		$2,481,975
Total Financing Costs		**$6,825,432**
Total Other Costs		**$60,606,043**
Builder Fee (10% Total Direct Costs)	10.0%	**$19,641,691**
TOTAL ESTIMATED COSTS		**$276,664,648**
RESIDUAL LAND VALUE		**$13,528,952**
Per Acre		$189,751
As a % of Value		**4.7%**

Source: Summer Villas; Wood Rodgers, Inc.; EPS.

[1] See Table B-1 for details.
[2] Gross building area includes garage square footage, while net sellable area only includes habitable square footage.
[3] See Table B-2 for further details on revenue and cost assumptions.
[4] Includes 30% cost contingency. See Table B-5 for details.

Table A-2
Elk Grove Summer Villas
Financial Feasibility Analysis
Feasibility Analysis Pro Forma: Comparison Site 1

Item		Site 1 Country Hill Drive
DEVELOPMENT PROGRAM ASSUMPTIONS [1]		
Site Acres	39.85	-
Single-Family Detached		
No. of Units		85
Avg. Unit Sq. Ft.		2,300
Avg. Garage Sq. Ft.		450
Gross Building Sq. Ft. [2]		233,750
Net Saleable Sq. Ft. [2]		195,500
Single-Family Detached		
No. of Units		74
Avg. Unit Sq. Ft.		1,900
Avg. Garage Sq. Ft.		450
Gross Building Sq. Ft. [2]		173,900
Net Saleable Sq. Ft. [2]		140,600
Single-Family Townhome		
No. of Units/Sq. Ft.		106
Avg. Unit Sq. Ft.		1,500
Avg. Garage Sq. Ft.		400
Gross Building Sq. Ft. [2]		201,400
Net Saleable Sq. Ft. [2]		159,000
Clubhouse		
Bldg Sq. Ft.		15,000
Parking Spaces		94
REVENUE ASSUMPTIONS [3]		
Single-Family Detached Sales		
Total Potential Sales Revenue		$56,695,000
Less Marketing/Commissions	4.0%	($2,267,800)
Net Total For-Sale Revenue		**$54,427,200**
Single-Family Detached Sales		
Total Potential Sales Revenue		$44,992,000
Less Marketing/Commissions	4.0%	($1,799,680)
Net Total For-Sale Revenue		**$43,192,320**
Single-Family Townhome Sales		
Total Potential Sales Revenue		$58,830,000
Less Marketing/Commissions	4.0%	($2,353,200)
Net Total For-Sale Revenue		**$56,476,800**
TOTAL ESTIMATED REVENUE		**$154,096,320**

Table A-2
Elk Grove Summer Villas
Financial Feasibility Analysis
Feasibility Analysis Pro Forma: Comparison Site 1

Item		Site 1 Country Hill Drive
COST ASSUMPTIONS [3]		
Direct Building Construction Costs		
Single-Family Detached		$28,050,000
AA Single-Family Detached (50x110)		$20,868,000
Single-Family Townhome		$30,210,000
Clubhouse		$2,250,000
Total Direct Building Construction Costs		**$81,378,000**
General Site Work [3]		$34,713,215
Existing Building Demolition		-
Parking Construction		
Surface Spaces (Clubhouse)		$656,250
Offsite Infrastructure Costs [4]		$6,214,100
Total Direct Construction Costs		**$122,961,565**
Other Costs		
Soft Costs (10% Total Direct Costs)	10.0%	**$12,296,157**
Entitlements (General Plan Amendment + EIR)		**$2,000,000**
Building and Development Impact Fees		
Single-Family Detached		$5,566,093
Single-Family Detached		$4,792,847
Single-Family Townhome		$6,324,359
Clubhouse		$385,738
Total Building & Development Impact Fees		**$17,069,038**
Financing		
Interest (7.0%, 50% LTC, 50% Outstanding)		$2,665,718
Fees (2.0% of loan amount)		$1,523,268
Total Financing Costs		**$4,188,986**
Total Other Costs		**$35,554,181**
Builder Fee (10% Total Direct Costs)	10.0%	**$12,296,157**
TOTAL ESTIMATED COSTS		**$170,811,902**
RESIDUAL LAND VALUE		**($16,715,582)**
Per Acre		($419,512)
As a % of Value		**(10.8%)**

Source: Summer Villas; Wood Rodgers, Inc.; EPS.

[1] See Table B-1 for details.
[2] Gross building area includes garage square footage, while net sellable area only includes habitable square footage.
[3] See Table B-2 for further details on revenue and cost assumptions.
[4] Includes 30% cost contingency. See Table B-5 for details.

Table A-3
Elk Grove Summer Villas
Financial Feasibility Analysis
Feasibility Analysis Pro Forma: Comparison Site 2

Item		Site 2 Bradshaw Road
DEVELOPMENT PROGRAM ASSUMPTIONS [1]		
Site Acres	34.21	-
Single-Family Detached		
No. of Units		73
Avg. Unit Sq. Ft.		2,300
Avg. Garage Sq. Ft.		450
Gross Building Sq. Ft. [2]		200,750
Net Saleable Sq. Ft. [2]		167,900
Single-Family Detached		
No. of Units		64
Avg. Unit Sq. Ft.		1,900
Avg. Garage Sq. Ft.		450
Gross Building Sq. Ft. [2]		150,400
Net Saleable Sq. Ft. [2]		121,600
Single-Family Townhome		
No. of Units/Sq. Ft.		91
Avg. Unit Sq. Ft.		1,500
Avg. Garage Sq. Ft.		400
Gross Building Sq. Ft. [2]		172,900
Net Saleable Sq. Ft. [2]		136,500
Clubhouse		
Bldg Sq. Ft.		15,000
Parking Spaces		94
REVENUE ASSUMPTIONS [3]		
Single-Family Detached Sales		
Total Potential Sales Revenue		$48,691,000
Less Marketing/Commissions	4.0%	($1,947,640)
Net Total For-Sale Revenue		**$46,743,360**
Single-Family Detached Sales		
Total Potential Sales Revenue		$38,912,000
Less Marketing/Commissions	4.0%	($1,556,480)
Net Total For-Sale Revenue		**$37,355,520**
Single-Family Townhome Sales		
Total Potential Sales Revenue		$50,505,000
Less Marketing/Commissions	4.0%	($2,020,200)
Net Total For-Sale Revenue		**$48,484,800**
TOTAL ESTIMATED REVENUE		**$132,583,680**

Table A-3
Elk Grove Summer Villas
Financial Feasibility Analysis
Feasibility Analysis Pro Forma: Comparison Site 2

Item		Site 2 Bradshaw Road
COST ASSUMPTIONS [3]		
Direct Building Construction Costs		
Single-Family Detached		$24,090,000
AA Single-Family Detached (50x110)		$18,048,000
Single-Family Townhome		$25,935,000
Clubhouse		$2,250,000
Total Direct Building Construction Costs		**$70,323,000**
General Site Work		$14,902,298
Existing Building Demolition		-
Parking Construction		
Surface Spaces (Clubhouse)		$656,250
Offsite Infrastructure Costs [4]		$8,057,600
Total Direct Construction Costs		**$93,939,148**
Other Costs		
Soft Costs (10% Total Direct Costs)	10.0%	**$9,393,915**
Entitlements (General Plan Amendment + EIR)		**$2,000,000**
Building and Development Impact Fees		
Single-Family Detached		$4,780,292
Single-Family Detached		$4,145,165
Single-Family Townhome		$5,429,402
Clubhouse		$385,738
Total Building & Development Impact Fees		**$14,740,598**
Financing		
Interest (7.0%, 50% LTC, 50% Outstanding)		$2,066,289
Fees (2.0% of loan amount)		$1,180,737
Total Financing Costs		**$3,247,026**
Total Other Costs		**$29,381,539**
Builder Fee (10% Total Direct Costs)	10.0%	**$9,393,915**
TOTAL ESTIMATED COSTS		**$132,714,601**
RESIDUAL LAND VALUE		**($130,921)**
Per Acre		($3,827)
As a % of Value		**(0.1%)**

Source: Summer Villas; Wood Rodgers, Inc.; EPS.

[1] See Table B-1 for details.
[2] Gross building area includes garage square footage, while net sellable area only includes habitable square footage.
[3] See Table B-2 for further details on revenue and cost assumptions.
[4] Includes 30% cost contingency. See Table B-5 for details.

Table A-4
Elk Grove Summer Villas
Financial Feasibility Analysis
Feasibility Analysis Pro Forma: Comparison Site 3

Item		Site 3 Bader & Sheldon South
DEVELOPMENT PROGRAM ASSUMPTIONS [1]		
Site Acres	29.60	-
Single-Family Detached		
No. of Units		63
Avg. Unit Sq. Ft.		2,300
Avg. Garage Sq. Ft.		450
Gross Building Sq. Ft. [2]		173,250
Net Saleable Sq. Ft. [2]		144,900
Single-Family Detached		
No. of Units		55
Avg. Unit Sq. Ft.		1,900
Avg. Garage Sq. Ft.		450
Gross Building Sq. Ft. [2]		129,250
Net Saleable Sq. Ft. [2]		104,500
Single-Family Townhome		
No. of Units/Sq. Ft.		79
Avg. Unit Sq. Ft.		1,500
Avg. Garage Sq. Ft.		400
Gross Building Sq. Ft. [2]		150,100
Net Saleable Sq. Ft. [2]		118,500
Clubhouse		
Bldg Sq. Ft.		10,000
Parking Spaces		63
REVENUE ASSUMPTIONS [3]		
Single-Family Detached Sales		
Total Potential Sales Revenue		$42,021,000
Less Marketing/Commissions	4.0%	($1,680,840)
Net Total For-Sale Revenue		**$40,340,160**
Single-Family Detached Sales		
Total Potential Sales Revenue		$33,440,000
Less Marketing/Commissions	4.0%	($1,337,600)
Net Total For-Sale Revenue		**$32,102,400**
Single-Family Townhome Sales		
Total Potential Sales Revenue		$43,845,000
Less Marketing/Commissions	4.0%	($1,753,800)
Net Total For-Sale Revenue		**$42,091,200**
TOTAL ESTIMATED REVENUE		**$114,533,760**

Table A-4
Elk Grove Summer Villas
Financial Feasibility Analysis
Feasibility Analysis Pro Forma: Comparison Site 3

Item		Site 3 Bader & Sheldon South
COST ASSUMPTIONS [3]		
Direct Building Construction Costs		
Single-Family Detached		$20,790,000
AA Single-Family Detached (50x110)		$15,510,000
Single-Family Townhome		$22,515,000
Clubhouse		$1,500,000
Total Direct Building Construction Costs		**$60,315,000**
General Site Work		$12,892,025
Existing Building Demolition		$8,909
Parking Construction		
Surface Spaces (Clubhouse)		$437,500
Offsite Infrastructure Costs [4]		$12,083,800
Total Direct Construction Costs		**$85,737,234**
Other Costs		
Soft Costs (10% Total Direct Costs)	10.0%	**$8,573,723**
Entitlements (General Plan Amendment + EIR)		**$2,000,000**
Building and Development Impact Fees		
Single-Family Detached		$4,125,457
Single-Family Detached		$3,562,252
Single-Family Townhome		$4,713,437
Clubhouse		$274,008
Total Building & Development Impact Fees		**$12,675,154**
Financing		
Interest (7.0%, 50% LTC, 50% Outstanding)		$1,872,257
Fees (2.0% of loan amount)		$1,069,861
Total Financing Costs		**$2,942,118**
Total Other Costs		**$26,190,996**
Builder Fee (10% Total Direct Costs)	10.0%	**$8,573,723**
TOTAL ESTIMATED COSTS		**$120,501,953**
RESIDUAL LAND VALUE		**($5,968,193)**
Per Acre		($201,655)
As a % of Value		**(5.2%)**

Source: Summer Villas; Wood Rodgers, Inc.; EPS.

[1] See Table B-1 for details.
[2] Gross building area includes garage square footage, while net sellable area only includes habitable square footage.
[3] See Table B-2 for further details on revenue and cost assumptions.
[4] Includes 30% cost contingency. See Table B-5 for details.

Table A-5
Elk Grove Summer Villas
Financial Feasibility Analysis
Feasibility Analysis Pro Forma: Comparison Site 4

Item		Site 4 Bader & Sheldon North
DEVELOPMENT PROGRAM ASSUMPTIONS [1]		
Site Acres	35.57	-
Single-Family Detached		
No. of Units		76
Avg. Unit Sq. Ft.		2,300
Avg. Garage Sq. Ft.		450
Gross Building Sq. Ft. [2]		209,000
Net Saleable Sq. Ft. [2]		174,800
Single-Family Detached		
No. of Units		66
Avg. Unit Sq. Ft.		1,900
Avg. Garage Sq. Ft.		450
Gross Building Sq. Ft. [2]		155,100
Net Saleable Sq. Ft. [2]		125,400
Single-Family Townhome		
No. of Units/Sq. Ft.		94
Avg. Unit Sq. Ft.		1,500
Avg. Garage Sq. Ft.		400
Gross Building Sq. Ft. [2]		178,600
Net Saleable Sq. Ft. [2]		141,000
Clubhouse		
Bldg Sq. Ft.		15,000
Parking Spaces		94
REVENUE ASSUMPTIONS [3]		
Single-Family Detached Sales		
Total Potential Sales Revenue		$50,692,000
Less Marketing/Commissions	4.0%	($2,027,680)
Net Total For-Sale Revenue		**$48,664,320**
Single-Family Detached Sales		
Total Potential Sales Revenue		$40,128,000
Less Marketing/Commissions	4.0%	($1,605,120)
Net Total For-Sale Revenue		**$38,522,880**
Single-Family Townhome Sales		
Total Potential Sales Revenue		$52,170,000
Less Marketing/Commissions	4.0%	($2,086,800)
Net Total For-Sale Revenue		**$50,083,200**
TOTAL ESTIMATED REVENUE		**$137,270,400**

Table A-5
Elk Grove Summer Villas
Financial Feasibility Analysis
Feasibility Analysis Pro Forma: Comparison Site 4

Item		Site 4 Bader & Sheldon North
COST ASSUMPTIONS [3]		
Direct Building Construction Costs		
Single-Family Detached		$25,080,000
AA Single-Family Detached (50x110)		$18,612,000
Single-Family Townhome		$26,790,000
Clubhouse		$2,250,000
Total Direct Building Construction Costs		**$72,732,000**
General Site Work		$15,493,689
Existing Building Demolition		$11,178
Parking Construction		
Surface Spaces (Clubhouse)		$656,250
Offsite Infrastructure Costs [4]		$13,348,200
Total Direct Construction Costs		**$102,241,317**
Other Costs		
Soft Costs (10% Total Direct Costs)	10.0%	**$10,224,132**
Entitlements (General Plan Amendment + EIR)		**$2,000,000**
Building and Development Impact Fees		
Single-Family Detached		$4,976,742
Single-Family Detached		$4,274,702
Single-Family Townhome		$5,608,394
Clubhouse		$385,738
Total Building & Development Impact Fees		**$15,245,576**
Financing		
Interest (7.0%, 50% LTC, 50% Outstanding)		$2,234,943
Fees (2.0% of loan amount)		$1,277,110
Total Financing Costs		**$3,512,053**
Total Other Costs		**$30,981,761**
Builder Fee (10% Total Direct Costs)	10.0%	**$10,224,132**
TOTAL ESTIMATED COSTS		**$143,447,210**
RESIDUAL LAND VALUE		**($6,176,810)**
Per Acre		($173,659)
As a % of Value		**(4.5%)**

Source: Summer Villas; Wood Rodgers, Inc.; EPS.

[1] See Table B-1 for details.
[2] Gross building area includes garage square footage, while net sellable area only includes habitable square footage.
[3] See Table B-2 for further details on revenue and cost assumptions.
[4] Includes 30% cost contingency. See Table B-5 for details.

Table A-6
Elk Grove Summer Villas
Financial Feasibility Analysis
Feasibility Analysis Pro Forma: Comparison Site 5

Item		Site 5 Calvine Road
DEVELOPMENT PROGRAM ASSUMPTIONS [1]		
Site Acres	19.41	-
Single-Family Detached		
No. of Units		41
Avg. Unit Sq. Ft.		2,300
Avg. Garage Sq. Ft.		450
Gross Building Sq. Ft. [2]		112,750
Net Saleable Sq. Ft. [2]		94,300
Single-Family Detached		
No. of Units		36
Avg. Unit Sq. Ft.		1,900
Avg. Garage Sq. Ft.		450
Gross Building Sq. Ft. [2]		84,600
Net Saleable Sq. Ft. [2]		68,400
Single-Family Townhome		
No. of Units/Sq. Ft.		52
Avg. Unit Sq. Ft.		1,500
Avg. Garage Sq. Ft.		400
Gross Building Sq. Ft. [2]		98,800
Net Saleable Sq. Ft. [2]		78,000
Clubhouse		
Bldg Sq. Ft.		10,000
Parking Spaces		63
REVENUE ASSUMPTIONS [3]		
Single-Family Detached Sales		
Total Potential Sales Revenue		$27,347,000
Less Marketing/Commissions	4.0%	($1,093,880)
Net Total For-Sale Revenue		**$26,253,120**
Single-Family Detached Sales		
Total Potential Sales Revenue		$21,888,000
Less Marketing/Commissions	4.0%	($875,520)
Net Total For-Sale Revenue		**$21,012,480**
Single-Family Townhome Sales		
Total Potential Sales Revenue		$28,860,000
Less Marketing/Commissions	4.0%	($1,154,400)
Net Total For-Sale Revenue		**$27,705,600**
TOTAL ESTIMATED REVENUE		**$74,971,200**

Table A-6
Elk Grove Summer Villas
Financial Feasibility Analysis
Feasibility Analysis Pro Forma: Comparison Site 5

Item		Site 5 Calvine Road
COST ASSUMPTIONS [3]		
Direct Building Construction Costs		
Single-Family Detached		$13,530,000
AA Single-Family Detached (50x110)		$10,152,000
Single-Family Townhome		$14,820,000
Clubhouse		$1,500,000
Total Direct Building Construction Costs		**$40,002,000**
General Site Work		$8,455,168
Existing Building Demolition		$9,970
Parking Construction		
Surface Spaces (Clubhouse)		$437,500
Offsite Infrastructure Costs [4]		$13,348,200
Total Direct Construction Costs		**$62,252,837**
Other Costs		
Soft Costs (10% Total Direct Costs)	10.0%	**$6,225,284**
Entitlements (General Plan Amendment + EIR)		**$2,000,000**
Building and Development Impact Fees		
Single-Family Detached		$2,684,822
Single-Family Detached		$2,331,656
Single-Family Townhome		$3,102,516
Clubhouse		$274,008
Total Building & Development Impact Fees		**$8,393,001**
Financing		
Interest (7.0%, 50% LTC, 50% Outstanding)		$1,345,245
Fees (2.0% of loan amount)		$768,711
Total Financing Costs		**$2,113,956**
Total Other Costs		**$18,732,240**
Builder Fee (10% Total Direct Costs)	10.0%	**$6,225,284**
TOTAL ESTIMATED COSTS		**$87,210,361**
RESIDUAL LAND VALUE		**($12,239,161)**
Per Acre		($630,547)
As a % of Value		**(16.3%)**

Source: Summer Villas; Wood Rodgers, Inc.; EPS.

[1] See Table B-1 for details.
[2] Gross building area includes garage square footage, while net sellable area only includes habitable square footage.
[3] See Table B-2 for further details on revenue and cost assumptions.
[4] Includes 30% cost contingency. See Table B-5 for details.

Economic & Planning Systems, Inc.
The Economics of Land Use

Appendix B
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Table B-1
Elk Grove Summer Villas
Financial Feasibility Analysis
Development Assumptions

Item	Project Site Summer Villas	Comparison Sites [1] Site 1 Country Hill Drive	Site 2 Bradshaw Road	Site 3 Bader & Sheldon South	Site 4 Bader & Sheldon North	Site 5 Calvine Road
EXISTING DEVELOPMENT						
Site Acres (Developable Acres)	71.3	39.8	34.2	29.6	35.6	19.4
Zoning	AR-2 (Existing) Summer Villas SPA (Proposed)	AR-2	AR-5	AR-5	AR-2	AR-2
DEVELOPMENT PROGRAM ASSUMPTIONS						
Residential Land Use						
AA Single-Family Detached (60x115)						
Land Use [2]	AA Single-Family Detached	Single-Family Detached	Single-Family Detached	Single-Family Detached	Single-Family Detached	Single-Family Detached
Tenure	Ownership	Ownership	Ownership	Ownership	Ownership	Ownership
No. of Units	160	85	73	63	76	41
Avg. Unit Sq. Ft. (Habitable)	2,300	2,300	2,300	2,300	2,300	2,300
Avg. Unit Sq. Ft. (Garage)	450	450	450	450	450	450
Gross Building Area (Sq. Ft.)	440,000	233,750	200,750	173,250	209,000	112,750
Net Saleable Sq. Ft.	368,000	195,500	167,900	144,900	174,800	94,300
AA Single-Family Detached (50x110)						
Land Use [2]	AA Single-Family Detached	Single-Family Detached	Single-Family Detached	Single-Family Detached	Single-Family Detached	Single-Family Detached
Tenure	Ownership	Ownership	Ownership	Ownership	Ownership	Ownership
No. of Units	140	74	64	55	66	36
Avg. Unit Sq. Ft. (Habitable)	1,900	1,900	1,900	1,900	1,900	1,900
Avg. Unit Sq. Ft. (Garage)	450	450	450	450	450	450
Gross Building Area (Sq. Ft.)	329,000	173,900	150,400	129,250	155,100	84,600
Net Saleable Sq. Ft.	266,000	140,600	121,600	104,500	125,400	68,400
AA Single-Family Townhome						
Land Use	AA Single-Family Townhome	Single-Family Townhome	Single-Family Townhome	Single-Family Townhome	Single-Family Townhome	Single-Family Townhome
Tenure	Ownership	Ownership	Ownership	Ownership	Ownership	Ownership
No. of Units	199	106	91	79	94	52
Avg. Unit Sq. Ft. (Habitable)	1,500	1,500	1,500	1,500	1,500	1,500
Avg. Unit Sq. Ft. (Garage)	400	400	400	400	400	400
Gross Building Area (Sq. Ft.)	378,100	201,400	172,900	150,100	178,600	98,800
Net Saleable Sq. Ft.	298,500	159,000	136,500	118,500	141,000	78,000
Nonresidential Land Use						
Clubhouse						
Bldg. Sq. Ft.	30,000	15,000	15,000	10,000	15,000	10,000
Parking Ratio	1 space per 160 SF	1 space per 160 SF	1 space per 160 SF	1 space per 160 SF	1 space per 160 SF	1 space per 160 SF
Lot Size (Sq. Ft)	150,000	75,000	75,000	50,000	75,000	50,000
Lot Size (Acres)	3.4	1.7	1.7	1.1	1.7	1.1
No. of Parking Spaces (Surface)	188	94	94	63	94	63
Parking Summary						
Parking Constructed						
Surface	188	94	94	63	94	63

Source: Summer Villas; Sacramento County Assessor; Esri; EPS.

[1] Comparison Sites are not assumed to develop strictly as active-adult.
[2] Development types are categorized in order to assign construction unit costs to each proposed use.
[3] Parking Ratios are estimates for summary purposes and may not exactly match calculated ratios due to minor differences in the number of parking spaces.

Table B-2
Elk Grove Summer Villas
Financial Feasibility Analysis
Development Cost and Revenue Assumptions

Item	Assumptions	General Assumptions	LAND USE TYPE			
			Single-Family Detached (60x115)	Single-Family Detached (50x110)	Single-Family Townhomes	Clubhouse
Market Rate Revenue Assumptions						
Residential Sales Price [1]	Sales Price Per Square Foot	-	$290.00	$320.00	$370.00	
Hard Construction Cost Assumptions						
Basic Site Work/Grading	per land sq. ft.	$10.00	-	-	-	-
Building Construction Cost [2]	per gross building sq. ft.		$120.00	$120.00	$150.00	$150.00
Existing Structure Demolition [3]	per building sq. ft.	$5.67	-	-	-	-
Parking Hard Construction Cost						
Surface	per space	$7,000	-	-	-	-
Soft Costs	% of Direct Costs	10%	-	-	-	-
Builder Fee	% of Direct Costs	10%	-	-	-	-

Source: Summer Villas; Gregory Group;EPS.

[1] Based on estimated sales prices provided by Summer Villas and EPS review of sales of comparable properties in the Sacramento Region.
[2] Based on developer interviews and consultation with third-party data sources including RS Means and National Construction Estimator.
[3] Based on developer interviews.

Table B-3
Elk Grove Summer Villas
Financial Feasibility Analysis
Comparison Site Summary

Site	Site Description	Assessor's Parcel Number(s)	Area (Acres)	Zoning	Existing Development	Existing Bldg. Sq. Ft.
1	Country Hill Drive	12700100560000	39.8	AR-2	None	NA
2	Bradshaw Road	12703200180000	34.2	AR-5	None	NA
3	Bader & Sheldon South	12703101900000, 12703100200000, & 12703100210000	29.6	AR-5	1 SFH, various outbuildings	1,570
4	Bader & Sheldon North	12202500160000	35.6	AR-2	1 SFH, various outbuildings	1,970
5	Calvine Road	12301500050000	19.4	AR-2	None	1,757

Source: Sacramento County Assessor's Office; EPS.

Table B-4
Elk Grove Summer Villas
Financial Feasibility Analysis
Comparison Site Development Capacity Assumptions

Item	Assumption	Unit
Residential Assumptions		
Overall Density [1]	7	units per gross developable acre
Single-Family Detached (60x115)	32%	% of total units
Single-Family Detached (50x100)	28%	% of total units
Townhomes	40%	% of total units
Clubhouse Assumptions		
Bldg. Sq. Ft.	60	Sq. Ft. of clubhouse per unit
Lot FAR	0.2	FAR
Parking Ratio	160	Bldg. Sq. Ft. per space

Source: Based on preliminary lotting plan for Summer Villas and EPS review of comparable active-adult developments in the Sacramento Region.

[1] Developable residential land is equal to gross developable acres minus land area for clubhouse.

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Table B-5
Elk Grove Summer Villas
Financial Feasibility Analysis
Comparison Site Offsite Infrastructure Cost Estimates

Item	Unit	Unit Cost	Site											
			Summer Villas		1		2		3		4		5 [2]	
			Quantity	Cost	Quantity	Cost	Quantity	Cost	Quantity	Cost	Quantity	Cost	Quantity	Cost
Water Improvements [1]														
18" Water Line	lf	$300.00	7,300	$2,190,000	6,520	$1,956,000	7,890	$2,367,000	10,505	$3,151,500	12,280	$3,684,000	-	$0
24" Water Line [1]	lf	$350.00	2,700	$945,000	-	$0	-	$0	-	$0	-	$0	-	$0
Trench Repair	sf	$15.00	40,000	$600,000	26,080	$391,200	31,560	$473,400	42,020	$630,300	49,120	$736,800	-	$0
2" Grind and Overlay	sf	$5.00	160,000	$800,000	104,320	$521,600	126,240	$631,200	168,080	$840,400	196,480	$982,400	-	$0
Traffic Control	ea	$100,000.00	1	$100,000	1	$100,000	1	$100,000	1	$100,000	1	$100,000	1	$100,000
Traffic Restripe	lf	$12.00	20,000	$240,000	13,040	$156,480	15,780	$189,360	21,010	$252,120	24,560	$294,720	-	$0
Subtotal Water Cost				**$4,875,000**		**$3,125,280**		**$3,760,960**		**$4,974,320**		**$5,797,920**		**$100,000**
Sewer Improvements														
6" force main	lf	$200.00	6,500	$1,300,000	1,340	$268,000	3,230	$646,000	7,780	$1,556,000	8,140	$1,628,000	21,912	$4,382,400
Trench Repair	sf	$15.00	11,050	$165,750	2,680	$40,200	6,460	$96,900	15,560	$233,400	16,280	$244,200	43,824	$657,360
2" Grind and Overlay	sf	$5.00	104,000	$520,000	42,880	$214,400	103,360	$516,800	248,960	$1,244,800	260,480	$1,302,400	701,184	$3,505,920
Sewer Lift Station	ea	$1,000,000.00	1	$1,000,000	1	$1,000,000	1	$1,000,000	1	$1,000,000	1	$1,000,000	1	$1,000,000
Traffic Control	ea	$100,000.00	1	$100,000	1	$100,000	1	$100,000	1	$100,000	1	$100,000	1	$100,000
Traffic Restripe	lf	$12.00	13,000	$156,000	2,680	$32,160	6,460	$77,520	15,560	$186,720	16,280	$195,360	43,824	$525,888
Subtotal Sewer Cost				**$3,241,750**		**$1,654,760**		**$2,437,220**		**$4,320,920**		**$4,469,960**		**$10,171,568**
Subtotal Water and Sewer Costs				**$8,116,750**		**$4,780,040**		**$6,198,180**		**$9,295,240**		**$10,267,880**		**$10,271,568**
30% Contingency				$2,435,025		$1,434,012		$1,859,454		$2,788,572		$3,080,364		$3,081,470
Total Estimated Water and Sewer Costs (Rounded to nearest $100)				**$10,551,800**		**$6,214,100**		**$8,057,600**		**$12,083,800**		**$13,348,200**		**$13,353,000**

Source: Wood Rodgers, Inc. EPS

[1] Quantities of water and sewer facilities needed are based on conservative estimates of additional facilities that would needed after the completion of utility extensions by the Summer Villas project. Costs do not include contingency. All alternative sites assume 18" water line to be conservative in assessing feasibility. See Table B-6 for further details.
[2] Site 5 is assumed to have water available via Calvine Road main.

Table B-6
Elk Grove Summer Villas
Financial Feasibility Analysis
Offsite Infrastructure Estimate Methodology

Item	Amount	Unit Price	Unit
Water Improvements			
18" Water Pipe		$300	per linear foot
24" Water		$350	per linear foot
Trench Repair Quantity	4		square feet per linear feet of water line
Trench Repair Cost		$15	per square foot
2" Grind and Overlay Quantity	4		square feet per square feet of trench repair
2" Grind and Overlay Cost		$5	per square foot
Traffic Control	1	$100,000	per water project
Traffic Restripe Quantity	2		linear feet per linear foot of water line
Traffic Restripe Cost		$12	per linear foot
Sewer Improvements			
6" force main		200	per linear foot
Trench Repair Quantity	2		sqaure feet per linear foot of force main
Trench Repair Cost		$15	per square foot
2" Grind and Overlay Quantity	16		square feet per linear foot of force main
2" Grind and Overlay Cost		$5	per square foot
Sewer Lift Station	1	$1,000,000	per project
Traffic Control	1	$100,000	per sewer project
Traffic Restripe Quantity	2		linear feet per linear foot of force main
Traffic Restripe Cost		$12	per linear foot

Source: Wood Rodgers, Inc.; EPS.

Table B-7
Elk Grove Summer Villas
Financial Feasibility Analysis
Summer Villas Offsite Infrastructure Engineer's Estimate of Probable Cost

Item	Quantity	Unit	Unit Cost	Total Cost
Water Pipe - 18" (Waterman Road - Frontage)	2,700	LF	$300.00	$810,000
Water Pipe - 18" (Sheldon Road - Offsite)	4,600	LF	$300.00	$1,380,000
Water Pipe - 24" (Sheldon Road - Frontage)	2,700	LF	$350.00	$945,000
Trench Repair	40,000	SF	$15.00	$600,000
2" Grind & Overlay (Sheldon Road & Waterman Road)	160,000	SF	$5.00	$800,000
Traffic Control	1	each	$100,000.00	$100,000
Traffic - Restripe	20,000	LF	$12.00	$240,000
TOTAL OFFSITE WATER IMPROVEMENTS				**$4,875,000**
Force Main Pipe - 6" (Assumed)	6,500	LF	$200.00	$1,300,000
Trench Repair	11,050	SF	$15.00	$165,750
2" Grind & Overlay (Sheldon Road & Elk Grove Florin Road)	104,000	SF	$5.00	$520,000
Private Sewer Lift Station (±0.7 MGD Capacity)	1	each	$1,000,000.00	$1,000,000
Traffic Control	1	each	$100,000.00	$100,000
Traffic - Restripe	13,000	LF	$12.00	$156,000
TOTAL OFFSITE SEWER IMPROVEMENTS				**$3,241,750**

Source: Wood Rodgers, Inc.; EPS.

Table B-8
Elk Grove Summer Villas
Financial Feasibility Analysis
Building Permit and Impact Fee Estimate Summary - Summer Villas

Land Use	Project Typology	Square Feet per Unit/Bldg.	Total Units	Fee per Unit/Building	Total Fees	Reference
Large Single-Family Detached	Single-Family Detached (60x115)	2,300	160	$65,483	**$10,477,352**	Table B-9
Medium Single-Family Detached	Single-Family Detached (50x110)	1,900	140	$64,768	**$9,067,549**	Table B-10
Single-Family Attached	Single-Family Townhomes	1,500	199	$59,664	**$11,873,089**	Table B-11
Commercial	Clubhouse	30,000	-	$720,929	**$720,929**	Table B-12
Total		-	**499**	-	**$32,138,920**	

Source: City of Elk Grove; Sacramento County; various agencies; EPS.

Table B-9
Elk Grove Summer Villas
Financial Feasibility Analysis
Per Unit Fee Estimate - 60x115 Single-Family Detached

60x115 Lot Single-Family Detached

City/County/Special District Fees Per Unit	Fee per Unit	Assumptions/Notes
Current as of	*Jun-26*	
Processing Fees per Unit [1]		
Building Permit - Production Repeat [2]	$1,206	40% of major category fee (+10% for 2-story home, includes garage)
Plan Review Fee - Production Repeat [2]	$1,809	60% of major category fee (+10% for 2-story home, includes garage)
Master Plan Review	$77	$76.73 per application for SFR batch permits
Final Subdivision Map Fee	$84	$7,000 + $70/lot, assumes 499 lots
General Plan Update Fee	$92	$0.23 per $1,000 of valuation
Technology Fee	$161	$0.40 per $1,000 of valuation
Construction and Demolition Fee	$161	$0.40 per $1,000 of valuation (for homes of $250,000+ value only)
Strong Motion Instrumentation Fee	$52	0.00013 * valuation
California Building Standards Commission Fee	$16	$1 per $25,000 of valuation
Subtotal Processing Fees per Unit	**$3,658**	
Development Impact Fees per Unit		
SASD Sewer Collection Impact Fee (Expansion)	$3,219	$26,241 per net acre, of which SASD pays $3,775
SASD Sewer Treatment Impact Fee (New Communities)	$3,887	$3,887 per age-restricted unit
SASD IT Recovery Fee	$100	$100 per application
Zone 40 Water Development Fee [3]	$21,524	$21,524 per unit; 15% due prior to plan approval
Cosumnes CSD Fire Fee - Zone 1	$1,407	$1,407.06 per age-restricted unit
Cosumnes CSD Fire Sprinkler System Fee	$788	$788 per unit (production homes and townhomes/duplexes)
Roadway Fee	$4,840	$4,840 per single-family age-restricted unit over 1,000 sq. ft. (includes admin)
Sacramento County Transportation Mitigation Fee (Measure A)	$803	$803 per single-family senior housing unit over 2,400 sq. ft. (includes admin)
I-5 Subregional Corridor Mitigation Fee - District 4	$1,635	$1,587.14 per single-family age-restricted unit, plus 3% administration
Active Transportation Fee	$781	$780.73 per single-family age-restricted unit over 1,000 sq. ft. (includes admin)
Capital Facilities Fee	$2,942	$2,942 per single-family age-restricted unit (includes admin)
Affordable Housing Fee	$6,534	$6,169 per SFR unit or duplex, plus 3% administration
Swainson's Hawk Mitigation Fee	$2,556	$17,840 per acre
Zone 11A Drainage Fee	$3,297	Approximately $23,016 per acre, based on density [4]
Elk Grove Unified School District School Impact Fee	$1,932	$0.84 per square foot for age-restricted (55+) dwelling units
Eastern Elk Grove Park Fee	$5,581	$5,580.79 per age-restricted dwelling unit
Subtotal Development Impact Fees per Unit	**$61,825**	
TOTAL CITY/COUNTY/SPECIAL DISTRICT FEES PER UNIT	**$65,483**	

Table B-9
Elk Grove Summer Villas
Financial Feasibility Analysis
Per Unit Fee Estimate - 60x115 Single-Family Detached

60x115 Lot Single-Family Detached

City/County/Special District Fees Per Unit	Fee per Unit	Assumptions/Notes
Current as of	*Jun-26*	

Source: City of Elk Grove; Sacramento County; various agencies; EPS.

[1] Processing fees exclude mechanical, electrical, plumbing and other similar review fees.
[2] Major Category Permit Fee is $2,230 plus $62 for each additional 100 sq. ft. or fraction thereof, exceeding 2,000 sq. ft. for single family production homes plus 10% for 2-story homes, plus $350 + $17.50 per 100 garage square feet over 401 total.
[3] SCWA caps the initial payment of 15% to a maximum of $200,000 per subdivision.
[4] Based on linear interpolation of the SCWA Fee Schedule, as directed by the SCWA.

Single-Family Detached Residential: 6,900 Lot Sq. Ft.; 2,300 Sq. Ft. Unit; 450 Sq. Ft. Garage

Table B-10
Elk Grove Summer Villas
Financial Feasibility Analysis
Per Unit Fee Estimate - 55x100 Lot Single Family Detached

Midsize (55x100 lots) Single-Family Detached

City/County/Special District Fees Per Unit	Fee per Unit	Assumptions/Notes
Current as of	*Jun-26*	
Processing Fees per Unit [1]		
Building Permit - Production Repeat [2]	$1,101	40% of major category fee (+10% for 2-story home, includes garage)
Plan Review Fee - Production Repeat [2]	$1,651	60% of major category fee (+10% for 2-story home, includes garage)
Master Plan Review	$77	$76.73 per application for SFR batch permits
Final Subdivision Map Fee	$84	$7,000 + $70/lot, assumes 499 lots
General Plan Update Fee	$84	$0.23 per $1,000 of valuation
Technology Fee	$146	$0.40 per $1,000 of valuation
Construction and Demolition Fee	$146	$0.40 per $1,000 of valuation (for homes of $250,000+ value only)
Strong Motion Instrumentation Fee	$48	0.00013 * valuation
California Building Standards Commission Fee	$15	$1 per $25,000 of valuation
Subtotal Processing Fees per Unit	**$3,352**	
Development Impact Fees per Unit		
SASD Sewer Collection Impact Fee (Expansion)	$3,219	$26,241 per net acre, of which SASD pays $3,775
SASD Sewer Treatment Impact Fee (New Communities)	$3,887	$3,887 per age-restricted unit
SASD IT Recovery Fee	$100	$100 per application
Zone 40 Water Development Fee	$21,524	$21,524 per unit; 15% due prior to plan approval
Cosumnes CSD Fire Fee - Zone 1	$1,407	$1,407.06 per age-restricted unit
Cosumnes CSD Fire Sprinkler System Fee	$788	$788 per unit (production homes and townhomes/duplexes)
Roadway Fee - Zone 1	$4,840	$4,840 per single-family age-restricted unit over 1,000 sq. ft. (includes admin)
Sacramento County Transportation Mitigation Fee (Measure A)	$730	$730 per 1,601-2,400 sq. ft. single-family senior housing unit (includes admin)
I-5 Subregional Corridor Mitigation Fee - District 4	$1,635	$1,587.14 per single-family age-restricted unit, plus 3% administration
Active Transportation Fee	$781	$780.73 per single-family age-restricted unit over 1,000 sq. ft. (includes admin)
Capital Facilities Fee	$2,942	$2,942 per single-family age-restricted unit (includes admin)
Affordable Housing Fee	$6,534	$6,169 per SFR unit or duplex, plus 3% administration
Swainson's Hawk Mitigation Fee	$2,556	$17,840 per acre
Zone 11A Drainage Fee	$3,297	Approximately $23,016 per acre, based on density [4]
Elk Grove Unified School District School Impact Fee	$1,596	$0.84 per square foot for age-restricted (55+) dwelling units
Eastern Elk Grove Park Fee	$5,581	$5,580.79 per age-restricted dwelling unit
Subtotal Development Impact Fees per Unit	**$61,416**	
TOTAL CITY/COUNTY/SPECIAL DISTRICT FEES PER UNIT	**$64,768**	

Table B-10
Elk Grove Summer Villas
Financial Feasibility Analysis
Per Unit Fee Estimate - 55x100 Lot Single Family Detached

Midsize (55x100 lots) Single-Family Detached

City/County/Special District Fees Per Unit	Fee per Unit	Assumptions/Notes
Current as of	*Jun-26*	

Source: City of Elk Grove; Sacramento County; various agencies; EPS.

[1] Processing fees exclude mechanical, electrical, plumbing and other similar review fees.
[2] Major Category Permit Fee is $1,920 plus $62 for each additional 100 sq. ft. or fraction thereof, exceeding 1,500 sq. ft. for single family production homes plus 10% for 2-story homes, plus $350 + $17.50 per 100 garage square feet over 401 total.
[3] SCWA caps the initial payment of 15% to a maximum of $200,000 per subdivision.
[4] Based on linear interpolation of the SCWA Fee Schedule, as directed by the SCWA.

Table B-11
Elk Grove Summer Villas
Financial Feasibility Analysis
Per Unit Fee Estimate - Single-Family Townhome

Single-Family Attached

City/County/Special District Fees Per Unit	Fee per Unit	Assumptions/Notes
Current as of	*Jun-26*	
Processing Fees per Unit [1]		
Building Permit - Production Repeat [2] (fee per unit, see footnote 2)	$989	40% of major category fee (+10% for 2-story home, includes garage)
Plan Review Fee - Production Repeat [2] (fee per unit, see footnote 2)	$1,484	60% of major category fee (+10% for 2-story home, includes garage)
Master Plan Review	$77	$76.73 per application for SFR batch permits
Final Subdivision Map Fee	$84	$7,000 + $70/lot, assumes 499 lots
General Plan Update Fee	$67	$0.23 per $1,000 of valuation
Technology Fee	$117	$0.40 per $1,000 of valuation
Construction and Demolition Fee	$117	$0.40 per $1,000 of valuation (for homes of $250,000+ value only)
Strong Motion Instrumentation Fee	$38	0.00013 * valuation
California Building Standards Commission Fee	$12	$1 per $25,000 of valuation
Subtotal Processing Fees per Unit	**$2,984**	
Development Impact Fees per Unit		***For fees assessed on developed acreage, fee per unit is shown***
SASD Sewer Collection Impact Fee (Expansion)	$1,404	$26,241 per net acre, of which SASD pays $3,775
SASD Sewer Treatment Impact Fee (New Communities)	$3,887	$3,887 per age-restricted unit
SASD IT Recovery Fee	$50	$100 per application ($50 per unit)
Zone 40 Water Development Fee [3]	$21,524	$21,524 per unit; 15% due prior to plan approval
Cosumnes CSD Fire Fee - Zone 1	$1,407	$1,407.06 per age-restricted unit
Cosumnes CSD Fire Sprinkler System Fee	$788	$788 per unit (production homes and townhomes/duplexes)
Roadway Fee	$4,840	$4,840 per single-family age-restricted unit over 1,000 sq. ft. (includes admin)
Sacramento County Transportation Mitigation Fee (Measure A)	$647	$803 per multifamily senior housing unit, 1,600-2,400 sq. ft. (includes admin)
I-5 Subregional Corridor Mitigation Fee - District 4	$1,635	$1,587.14 per single-family age-restricted unit, plus 3% administration
Active Transportation Fee	$781	$780.73 per single-family age-restricted unit over 1,000 sq. ft. (includes admin)
Capital Facilities Fee	$2,350	$2,350 per single-family age-restricted unit (includes admin)
Affordable Housing Fee	$6,534	$6,169 per SFR unit (includes duplexes), plus 3% administration
Swainson's Hawk Mitigation Fee	$1,115	$17,840 per acre (per-unit amount shown)
Zone 11A Drainage Fee	$2,877	Based on density [4]
Elk Grove Unified School District School Impact Fee	$1,260	$0.84 per square foot for age-restricted (55+) dwelling units
Eastern Elk Grove Park Fee	$5,581	$5,580.79 per age-restricted dwelling unit
Subtotal Development Impact Fees per Unit	**$56,680**	
TOTAL CITY/COUNTY/SPECIAL DISTRICT FEES PER UNIT	**$59,664**	

Table B-11
Elk Grove Summer Villas
Financial Feasibility Analysis
Per Unit Fee Estimate - Single-Family Townhome

Single-Family Attached

City/County/Special District Fees Per Unit	Fee per Unit	Assumptions/Notes
Current as of	*Jun-26*	

Source: City of Elk Grove; Sacramento County; various agencies; EPS.

[1] Processing fees exclude mechanical, electrical, plumbing and other similar review fees.
[2] Major Category Permit Fee shown is half of the total fee assessed on two attached single-family homes on the same application. Fee is calculated as $2,530 plus $60 for each additional 100 sq. ft. or fraction thereof, exceeding 2,500 sq. ft., plus 10% for 2-story homes. The fee also includes $350 for a 400 sq. ft. garage, plus $17.50 for each additional 100 sq. ft. or fraction thereof, exceeding 400 sq. ft.
[3] SCWA caps the initial payment of 15% to a maximum of $200,000 per subdivision.
[4] Based on linear interpolation of the SCWA Fee Schedule, as directed by the SCWA.

Table B-12
Elk Grove Summer Villas
Financial Feasibility Analysis
Fee Estimate - Clubhouse

Clubhouse - Summer Villas

City/County/Special District Fees Per Unit	Fee per Unit	Assumptions/Notes
Current as of	*Jun-26*	
Construction Valuation	*$6,137,400*	Based on A-2 Assembly, Type VB at $204.58 per sq. ft.
Processing Fees per Unit [1]		
Building Permit - Production Repeat [2]	$9,866	40% of major category fee (+10% for 2-story home, includes garage)
Plan Review Fee - Production Repeat [2]	$14,799	60% of major category fee (+10% for 2-story home, includes garage)
Permit Review [3]	$135	Minimum of $135.41 per commercial/office project application
Final Subdivision Map Fee	$84	$7,000 + $70/lot, assumes 499 lots
General Plan Update Fee	$1,412	$0.23 per $1,000 of valuation
Technology Fee	$2,455	$0.40 per $1,000 of valuation
Construction and Demolition Fee	$2,455	$0.40 per $1,000 of valuation (for homes of $250,000+ value only)
Strong Motion Instrumentation Fee	$798	0.00013 * valuation
California Building Standards Commission Fee	$245	$1 per $25,000 of valuation
Subtotal Processing Fees per Unit	**$32,250**	
Development Impact Fees per Unit		
SASD Sewer Collection Impact Fee (Expansion)	$77,362	$26,241 per net acre, of which SASD pays $3,775
SASD Sewer Treatment Impact Fee (New Communities)	$19,437	$6,479 per ESD; assumes 3 ESDs [4]
SASD IT Recovery Fee	$100	$100 per application
Zone 40 Water Development Fee	$41,154	$11,951 per commercial acre
Cosumnes CSD Fire Fee - Zone 1	$67,200	$2.24 per square foot (commercial/office)
Cosumnes CSD Fire Sprinkler System Fee	$2,476	$2,476 per new commercial buldings (1-99 sprinklers)
Roadway Fee	$167,700	$5.59 per square foot (assembly)
Sacramento County Transportation Mitigation Fee (Measure A)	$71,970	$1,836 per 1,000 sq. ft. (retail/commercial)
I-5 Subregional Corridor Mitigation Fee - District 4	$2,160	$0.072 per square foot (assembly)
Active Transportation Fee	$27,300	$0.91 per square foot (assembly)
Capital Facilities Fee	$49,200	$1.634 per square foot (general commercial)
Affordable Housing Fee	$31,200	$1.05 per squre foot (commercial)
Swainson's Hawk Mitigation Fee	$61,433	$17,840 per acre
Zone 11A Drainage Fee	$29,488	Flat Rate for office/retail developments
Eastern Elk Grove Park Fee	$40,500	$1.35 per square foot (commercial)
Subtotal Development Impact Fees per Unit	**$688,679**	
TOTAL CITY/COUNTY/SPECIAL DISTRICT FEES PER Clubhouse	**$720,929**	

Source: City of Elk Grove; Sacramento County; various agencies; EPS.

[1] Processing fees exclude mechanical, electrical, plumbing and other similar review fees.
[2] Major Category Permit Fee is $22,532 plus $21.34 for each additional 100 sq. ft. or fraction thereof, exceeding 20,000 sq. ft. for assembly uses.
[3] Miniumum fee shown above. The Community Development Director or Planning Manager may require additional fees based upon the time necessary to ensure compliance with conditions of approval for the project's design review permit at an hourly rate of $135.41.
[4] The SASD Treatment Impact fee for nonresidential uses is calculated as $6,479 multiplied by the ESD Equivalent Factor in Section 4.2.2 of the SASD Treatment and Resource Recovery Ordinance (Effective August 8, 2025). This analsysis assumes the rate for retail developments under 100,000 square feet will be applied.

Table B-13
Elk Grove Summer Villas
Financial Feasibility Analysis
Fee Estimate - Clubhouse Site 1

Clubhouse - Site 1

City/County/Special District Fees Per Unit	Fee per Unit	Assumptions/Notes
Current as of	*Jun-26*	
Construction Valuation	*$3,068,700*	Based on A-2 Assembly, Type VB at $204.58 per sq. ft.
Processing Fees per Unit [1]		
Building Permit - Production Repeat [2]	$8,586	40% of major category fee (+10% for 2-story home, includes garage)
Plan Review Fee - Production Repeat [2]	$12,879	60% of major category fee (+10% for 2-story home, includes garage)
Permit Review [3]	$135	Minimum of $135.41 per commercial/office project application
Final Subdivision Map Fee	$84	$7,000 + $70/lot, assumes 499 lots
General Plan Update Fee	$706	$0.23 per $1,000 of valuation
Technology Fee	$1,227	$0.40 per $1,000 of valuation
Construction and Demolition Fee	$1,227	$0.40 per $1,000 of valuation (for homes of $250,000+ value only)
Strong Motion Instrumentation Fee	$399	0.00013 * valuation
California Building Standards Commission Fee	$123	$1 per $25,000 of valuation
Subtotal Processing Fees per Unit	**$25,367**	
Development Impact Fees per Unit		
SASD Sewer Collection Impact Fee (Expansion)	$38,681	$26,241 per net acre, of which SASD pays $3,775
SASD Sewer Treatment Impact Fee (New Communities)	$9,719	$6,479 per ESD; assumes 1.5 ESDs [4]
SASD IT Recovery Fee	$100	$100 per application
Zone 40 Water Development Fee	$20,577	$11,951 per commercial acre
Cosumnes CSD Fire Fee - Zone 1	$33,600	$2.24 per square foot (commercial/office)
Cosumnes CSD Fire Sprinkler System Fee	$2,476	$2,476 per new commercial buldings (1-99 sprinklers)
Roadway Fee	$83,850	$5.59 per square foot (assembly)
Sacramento County Transportation Mitigation Fee (Measure A)	$35,985	$1,836 per 1,000 sq. ft. (retail/commercial)
I-5 Subregional Corridor Mitigation Fee - District 4	$1,080	$0.072 per square foot (assembly)
Active Transportation Fee	$13,650	$0.91 per square foot (assembly)
Capital Facilities Fee	$24,600	$1.634 per square foot (general commercial)
Affordable Housing Fee	$15,600	$1.05 per squre foot (commercial)
Swainson's Hawk Mitigation Fee	$30,716	$17,840 per acre
Zone 11A Drainage Fee	$29,488	Flat Rate for office/retail developments
Eastern Elk Grove Park Fee	$20,250	$1.35 per square foot (commercial)
Subtotal Development Impact Fees per Unit	**$360,372**	
TOTAL CITY/COUNTY/SPECIAL DISTRICT FEES PER Clubhouse	**$385,738**	

Source: City of Elk Grove; Sacramento County; various agencies; EPS.

[1] Processing fees exclude mechanical, electrical, plumbing and other similar review fees.
[2] Major Category Permit Fee is $22,532 plus $21.34 for each additional 100 sq. ft. or fraction thereof, exceeding 20,000 sq. ft. for assembly uses.
[3] Miniumum fee shown above. The Community Development Director or Planning Manager may require additional fees based upon the time necessary to ensure compliance with conditions of approval for the project's design review permit at an hourly rate of $135.41.
[4] The SASD Treatment Impact fee for nonresidential uses is calculated as $6,479 multiplied by the ESD Equivalent Factor in Section 4.2.2 of the SASD Treatment and Resource Recovery Ordinance (Effective August 8, 2025). This analsysis assumes the rate for retail developments under 100,000 square feet will be applied.

Table B-14
Elk Grove Summer Villas
Financial Feasibility Analysis
Fee Estimate - Clubhouse Site 2

Clubhouse - Site 2

City/County/Special District Fees Per Unit	Fee per Unit	Assumptions/Notes
Current as of	*Jun-26*	
Construction Valuation	*$3,068,700*	Based on A-2 Assembly, Type VB at $204.58 per sq. ft.
Processing Fees per Unit [1]		
Building Permit - Production Repeat [2]	$8,586	40% of major category fee (+10% for 2-story home, includes garage)
Plan Review Fee - Production Repeat [2]	$12,879	60% of major category fee (+10% for 2-story home, includes garage)
Permit Review [3]	$135	Minimum of $135.41 per commercial/office project application
Final Subdivision Map Fee	$84	$7,000 + $70/lot, assumes 499 lots
General Plan Update Fee	$706	$0.23 per $1,000 of valuation
Technology Fee	$1,227	$0.40 per $1,000 of valuation
Construction and Demolition Fee	$1,227	$0.40 per $1,000 of valuation (for homes of $250,000+ value only)
Strong Motion Instrumentation Fee	$399	0.00013 * valuation
California Building Standards Commission Fee	$123	$1 per $25,000 of valuation
Subtotal Processing Fees per Unit	**$25,367**	
Development Impact Fees per Unit		
SASD Sewer Collection Impact Fee (Expansion)	$38,681	$26,241 per net acre, of which SASD pays $3,775
SASD Sewer Treatment Impact Fee (New Communities)	$9,719	$6,479 per ESD; assumes 1.5 ESDs [4]
SASD IT Recovery Fee	$100	$100 per application
Zone 40 Water Development Fee	$20,577	$11,951 per commercial acre
Cosumnes CSD Fire Fee - Zone 1	$33,600	$2.24 per square foot (commercial/office)
Cosumnes CSD Fire Sprinkler System Fee	$2,476	$2,476 per new commercial buldings (1-99 sprinklers)
Roadway Fee	$83,850	$5.59 per square foot (assembly)
Sacramento County Transportation Mitigation Fee (Measure A)	$35,985	$1,836 per 1,000 sq. ft. (retail/commercial)
I-5 Subregional Corridor Mitigation Fee - District 4	$1,080	$0.072 per square foot (assembly)
Active Transportation Fee	$13,650	$0.91 per square foot (assembly)
Capital Facilities Fee	$24,600	$1.634 per square foot (general commercial)
Affordable Housing Fee	$15,600	$1.05 per squre foot (commercial)
Swainson's Hawk Mitigation Fee	$30,716	$17,840 per acre
Zone 11A Drainage Fee	$29,488	Flat Rate for office/retail developments
Eastern Elk Grove Park Fee	$20,250	$1.35 per square foot (commercial)
Subtotal Development Impact Fees per Unit	**$360,372**	
TOTAL CITY/COUNTY/SPECIAL DISTRICT FEES PER Clubhouse	**$385,738**	

Source: City of Elk Grove; Sacramento County; various agencies; EPS.

[1] Processing fees exclude mechanical, electrical, plumbing and other similar review fees.
[2] Major Category Permit Fee is $22,532 plus $21.34 for each additional 100 sq. ft. or fraction thereof, exceeding 20,000 sq. ft. for assembly uses.
[3] Miniumum fee shown above. The Community Development Director or Planning Manager may require additional fees based upon the time necessary to ensure compliance with conditions of approval for the project's design review permit at an hourly rate of $135.41.
[4] The SASD Treatment Impact fee for nonresidential uses is calculated as $6,479 multiplied by the ESD Equivalent Factor in Section 4.2.2 of the SASD Treatment and Resource Recovery Ordinance (Effective August 8, 2025). This analsysis assumes the rate for retail developments under 100,000 square feet will be applied.

Table B-15
Elk Grove Summer Villas
Financial Feasibility Analysis
Fee Estimate - Clubhouse Site 3

Clubhouse - Site 3

City/County/Special District Fees Per Unit	Fee per Unit	Assumptions/Notes
Current as of	*Jun-26*	
Construction Valuation	*$2,045,800*	Based on A-2 Assembly, Type VB at $204.58 per sq. ft.
Processing Fees per Unit [1]		
Building Permit - Production Repeat [2]	$8,159	40% of major category fee (+10% for 2-story home, includes garage)
Plan Review Fee - Production Repeat [2]	$12,239	60% of major category fee (+10% for 2-story home, includes garage)
Permit Review [3]	$135	Minimum of $135.41 per commercial/office project application
Final Subdivision Map Fee	$84	$7,000 + $70/lot, assumes 499 lots
General Plan Update Fee	$471	$0.23 per $1,000 of valuation
Technology Fee	$818	$0.40 per $1,000 of valuation
Construction and Demolition Fee	$818	$0.40 per $1,000 of valuation (for homes of $250,000+ value only)
Strong Motion Instrumentation Fee	$266	0.00013 * valuation
California Building Standards Commission Fee	$82	$1 per $25,000 of valuation
Subtotal Processing Fees per Unit	**$23,072**	
Development Impact Fees per Unit		
SASD Sewer Collection Impact Fee (Expansion)	$25,787	$26,241 per net acre, of which SASD pays $3,775
SASD Sewer Treatment Impact Fee (New Communities)	$6,479	$6,479 per ESD; assumes 1 ESDs [4]
SASD IT Recovery Fee	$100	$100 per application
Zone 40 Water Development Fee	$13,718	$11,951 per commercial acre
Cosumnes CSD Fire Fee - Zone 1	$22,400	$2.24 per square foot (commercial/office)
Cosumnes CSD Fire Sprinkler System Fee	$2,476	$2,476 per new commercial buldings (1-99 sprinklers)
Roadway Fee	$55,900	$5.59 per square foot (assembly)
Sacramento County Transportation Mitigation Fee (Measure A)	$23,990	$1,836 per 1,000 sq. ft. (retail/commercial)
I-5 Subregional Corridor Mitigation Fee - District 4	$720	$0.072 per square foot (assembly)
Active Transportation Fee	$9,100	$0.91 per square foot (assembly)
Capital Facilities Fee	$16,400	$1.634 per square foot (general commercial)
Affordable Housing Fee	$10,400	$1.05 per squre foot (commercial)
Swainson's Hawk Mitigation Fee	$20,478	$17,840 per acre
Zone 11A Drainage Fee	$29,488	Flat Rate for office/retail developments
Eastern Elk Grove Park Fee	$13,500	$1.35 per square foot (commercial)
Subtotal Development Impact Fees per Unit	**$250,936**	
TOTAL CITY/COUNTY/SPECIAL DISTRICT FEES PER Clubhouse	**$274,008**	

Source: City of Elk Grove; Sacramento County; various agencies; EPS.

[1] Processing fees exclude mechanical, electrical, plumbing and other similar review fees.
[2] Major Category Permit Fee is $22,532 plus $21.34 for each additional 100 sq. ft. or fraction thereof, exceeding 20,000 sq. ft. for assembly uses.
[3] Miniumum fee shown above. The Community Development Director or Planning Manager may require additional fees based upon the time necessary to ensure compliance with conditions of approval for the project's design review permit at an hourly rate of $135.41.
[4] The SASD Treatment Impact fee for nonresidential uses is calculated as $6,479 multiplied by the ESD Equivalent Factor in Section 4.2.2 of the SASD Treatment and Resource Recovery Ordinance (Effective August 8, 2025). This analsysis assumes the rate for retail developments under 100,000 square feet will be applied.

Table B-16
Elk Grove Summer Villas
Financial Feasibility Analysis
Fee Estimate - Clubhouse Site 4

Clubhouse - Site 4

City/County/Special District Fees Per Unit	Fee per Unit	Assumptions/Notes
Current as of	*Jun-26*	
Construction Valuation	*$3,068,700*	Based on A-2 Assembly, Type VB at $204.58 per sq. ft.
Processing Fees per Unit [1]		
Building Permit - Production Repeat [2]	$8,586	40% of major category fee (+10% for 2-story home, includes garage)
Plan Review Fee - Production Repeat [2]	$12,879	60% of major category fee (+10% for 2-story home, includes garage)
Permit Review [3]	$135	Minimum of $135.41 per commercial/office project application
Final Subdivision Map Fee	$84	$7,000 + $70/lot, assumes 499 lots
General Plan Update Fee	$706	$0.23 per $1,000 of valuation
Technology Fee	$1,227	$0.40 per $1,000 of valuation
Construction and Demolition Fee	$1,227	$0.40 per $1,000 of valuation (for homes of $250,000+ value only)
Strong Motion Instrumentation Fee	$399	0.00013 * valuation
California Building Standards Commission Fee	$123	$1 per $25,000 of valuation
Subtotal Processing Fees per Unit	**$25,367**	
Development Impact Fees per Unit		
SASD Sewer Collection Impact Fee (Expansion)	$38,681	$26,241 per net acre, of which SASD pays $3,775
SASD Sewer Treatment Impact Fee (New Communities)	$9,719	$6,479 per ESD; assumes 1.5 ESDs [4]
SASD IT Recovery Fee	$100	$100 per application
Zone 40 Water Development Fee	$20,577	$11,951 per commercial acre
Cosumnes CSD Fire Fee - Zone 1	$33,600	$2.24 per square foot (commercial/office)
Cosumnes CSD Fire Sprinkler System Fee	$2,476	$2,476 per new commercial buldings (1-99 sprinklers)
Roadway Fee	$83,850	$5.59 per square foot (assembly)
Sacramento County Transportation Mitigation Fee (Measure A)	$35,985	$1,836 per 1,000 sq. ft. (retail/commercial)
I-5 Subregional Corridor Mitigation Fee - District 4	$1,080	$0.072 per square foot (assembly)
Active Transportation Fee	$13,650	$0.91 per square foot (assembly)
Capital Facilities Fee	$24,600	$1.634 per square foot (general commercial)
Affordable Housing Fee	$15,600	$1.05 per squre foot (commercial)
Swainson's Hawk Mitigation Fee	$30,716	$17,840 per acre
Zone 11A Drainage Fee	$29,488	Flat Rate for office/retail developments
Eastern Elk Grove Park Fee	$20,250	$1.35 per square foot (commercial)
Subtotal Development Impact Fees per Unit	**$360,372**	
TOTAL CITY/COUNTY/SPECIAL DISTRICT FEES PER Clubhouse	**$385,738**	

Source: City of Elk Grove; Sacramento County; various agencies; EPS.

[1] Processing fees exclude mechanical, electrical, plumbing and other similar review fees.
[2] Major Category Permit Fee is $22,532 plus $21.34 for each additional 100 sq. ft. or fraction thereof, exceeding 20,000 sq. ft. for assembly uses.
[3] Miniumum fee shown above. The Community Development Director or Planning Manager may require additional fees based upon the time necessary to ensure compliance with conditions of approval for the project's design review permit at an hourly rate of $135.41.
[4] The SASD Treatment Impact fee for nonresidential uses is calculated as $6,479 multiplied by the ESD Equivalent Factor in Section 4.2.2 of the SASD Treatment and Resource Recovery Ordinance (Effective August 8, 2025). This analsysis assumes the rate for retail developments under 100,000 square feet will be applied.

Table B-17
Elk Grove Summer Villas
Financial Feasibility Analysis
Fee Estimate - Clubhouse Site 5

Clubhouse - Site 5

City/County/Special District Fees Per Unit	Fee per Unit	Assumptions/Notes
Current as of	*Jun-26*	
Construction Valuation	*$2,045,800*	Based on A-2 Assembly, Type VB at $204.58 per sq. ft.
Processing Fees per Unit [1]		
Building Permit - Production Repeat [2]	$8,159	40% of major category fee (+10% for 2-story home, includes garage)
Plan Review Fee - Production Repeat [2]	$12,239	60% of major category fee (+10% for 2-story home, includes garage)
Permit Review [3]	$135	Minimum of $135.41 per commercial/office project application
Final Subdivision Map Fee	$84	$7,000 + $70/lot, assumes 499 lots
General Plan Update Fee	$471	$0.23 per $1,000 of valuation
Technology Fee	$818	$0.40 per $1,000 of valuation
Construction and Demolition Fee	$818	$0.40 per $1,000 of valuation (for homes of $250,000+ value only)
Strong Motion Instrumentation Fee	$266	0.00013 * valuation
California Building Standards Commission Fee	$82	$1 per $25,000 of valuation
Subtotal Processing Fees per Unit	**$23,072**	
Development Impact Fees per Unit		
SASD Sewer Collection Impact Fee (Expansion)	$25,787	$26,241 per net acre, of which SASD pays $3,775
SASD Sewer Treatment Impact Fee (New Communities)	$6,479	$6,479 per ESD; assumes 1 ESDs [4]
SASD IT Recovery Fee	$100	$100 per application
Zone 40 Water Development Fee	$13,718	$11,951 per commercial acre
Cosumnes CSD Fire Fee - Zone 1	$22,400	$2.24 per square foot (commercial/office)
Cosumnes CSD Fire Sprinkler System Fee	$2,476	$2,476 per new commercial buldings (1-99 sprinklers)
Roadway Fee	$55,900	$5.59 per square foot (assembly)
Sacramento County Transportation Mitigation Fee (Measure A)	$23,990	$1,836 per 1,000 sq. ft. (retail/commercial)
I-5 Subregional Corridor Mitigation Fee - District 4	$720	$0.072 per square foot (assembly)
Active Transportation Fee	$9,100	$0.91 per square foot (assembly)
Capital Facilities Fee	$16,400	$1.634 per square foot (general commercial)
Affordable Housing Fee	$10,400	$1.05 per squre foot (commercial)
Swainson's Hawk Mitigation Fee	$20,478	$17,840 per acre
Zone 11A Drainage Fee	$29,488	Flat Rate for office/retail developments
Eastern Elk Grove Park Fee	$13,500	$1.35 per square foot (commercial)
Subtotal Development Impact Fees per Unit	**$250,936**	
TOTAL CITY/COUNTY/SPECIAL DISTRICT FEES PER Clubhouse	**$274,008**	

Source: City of Elk Grove; Sacramento County; various agencies; EPS.

[1] Processing fees exclude mechanical, electrical, plumbing and other similar review fees.
[2] Major Category Permit Fee is $22,532 plus $21.34 for each additional 100 sq. ft. or fraction thereof, exceeding 20,000 sq. ft. for assembly uses.
[3] Miniumum fee shown above. The Community Development Director or Planning Manager may require additional fees based upon the time necessary to ensure compliance with conditions of approval for the project's design review permit at an hourly rate of $135.41.
[4] The SASD Treatment Impact fee for nonresidential uses is calculated as $6,479 multiplied by the ESD Equivalent Factor in Section 4.2.2 of the SASD Treatment and Resource Recovery Ordinance (Effective August 8, 2025). This analsysis assumes the rate for retail developments under 100,000 square feet will be applied.

Table B-18
Elk Grove Summer Villas
Financial Feasibility Analysis
Vacant Land Comparable Sales

Address	City	Submarket [1]	Zoning	Acres	Sales Price	Price Per Acre	Status [2]
8500 Sheldon Rd	Elk Grove	South Sacramento	GC	19.81	$13,420,000	$677,435	Finished Lots
Bella Breeze Dr	Lincoln	Roseville/Rocklin	HD-1	29.30	$17,683,000	$603,515	Finished Lots
Westbrook Blvd	Roseville	Roseville/Rocklin	LDR	12.93	$11,005,000	$851,121	Finished Lots
East Ave	Lincoln	Auburn/Lincoln	MDR	13.71	$10,375,000	$756,746	Finished Lots
5672 Sunset Blvd W	Roseville	Roseville/Rocklin	PD	46.47	$28,980,000	$623,628	Finished Lots
Elk Horn Blvd	Sacramento	North Natomas	R-1A	30.00	$27,710,500	$923,683	Finished Lots
5627 Drifton Way	Sacramento	North Natomas	R-1A-P	13.43	$18,109,500	$1,348,436	Finished Lots
4106 Eventide Ave	Sacramento	North Natomas	R-1A-P	21.58	$28,015,000	$1,298,192	Finished Lots
Fountain Dr	West Sacramento	West Sacramento	R-2	30.51	$26,000,000	$852,179	Finished Lots
11899 Herodian Dr	Rancho Cordova	Highway 50 Corridor	RD 7 (SDSP)	21.25	$20,000,000	$941,176	Finished Lots
Sheldon Rd	Elk Grove	Elk Grove	RD6, RD10, RD25, GC, PR	41.63	$11,432,500	$274,622	Finished Lots
Don Julio Blvd	Antelope	Rio Linda/N Highlands	RD-7, O	92.57	$15,079,500	$162,898	Finished Lots
3801 Earl Rush Dr	Roseville	Roseville/Rocklin	RS/DS	17.12	$10,860,000	$634,346	Finished Lots
Santucci Blvd	Roseville	Roseville/Rocklin	RS/DS	58.89	$65,081,500	$1,105,137	Finished Lots
9530 Sierra College Blvd	Roseville	Roseville/Rocklin	RS-AG-B-40	16.30	$12,750,000	$782,209	Finished Lots
12525 Douglas Blvd	Rancho Cordova	Outer Sacramento County	AG80	41.50	$2,100,000	$50,602	Entitled
7911 Elefa Ave	Elk Grove	Elk Grove	CP-NP-LP	39.61	$34,797,000	$878,490	Entitled
620 Oak Tree Ln	Lincoln	Roseville/Rocklin	F-B-X	66.55	$14,000,000	$210,368	Entitled
10220 W Stockton Blvd	Elk Grove	Elk Grove	MULT	46.28	$26,843,000	$580,013	Entitled
SWQ Diamond Oaks Rd & Shasta St	Roseville	Roseville/Rocklin	R3	23.00	$7,125,000	$309,783	Entitled
Elk Grove Florin Rd	Elk Grove	Elk Grove	RD-10	11.38	$3,825,000	$336,116	Entitled
1401 Malcolm Dixon Rd	El Dorado Hills	Outer El Dorado County	RE-5	117.00	$8,544,000	$73,026	Entitled
9853 Gerber Rd	Sacramento	Outer Sacramento County	AR-10	29.69	$1,500,000	$50,522	Zoned for Development
Vista Grande Blvd	Roseville	Roseville/Rocklin	LDR	20.46	$16,000,000	$781,966	Zoned for Development
5600 Straight	Roseville	Roseville/Rocklin	MDR	56.00	$5,500,000	$98,214	Zoned for Development
10220 W Stockton Blvd	Elk Grove	Elk Grove	MULT	46.28	$17,957,000	$388,008	Zoned for Development
Seq Of Bass Pro Drive & Sierra College Bl	Rocklin	Roseville/Rocklin	PD-C, OA, PD-3.5 to 8.4	34.00	$3,600,000	$105,882	Zoned for Development
Cobble Brook Dr	Rancho Cordova	Highway 50 Corridor	POS	22.74	$21,590,000	$949,429	Zoned for Development
Freeport Rd	Sacramento	South Sacramento	R-1A-PUD R	87.30	$12,484,500	$143,007	Zoned for Development
N Hayden Pky	Roseville	Roseville/Rocklin	R3	26.20	$8,295,000	$316,603	Zoned for Development
Fiddyment Rd	Roseville	Roseville/Rocklin	R3	11.10	$4,325,000	$389,640	Zoned for Development
Sierra College Blvd	Loomis	Roseville/Rocklin	RA	34.26	$1,197,500	$34,953	Zoned for Development
4870 Douglas Blvd	Granite Bay	Roseville/Rocklin	RA-B-100	32.40	$8,470,000	$261,420	Zoned for Development
Jackson Rd	Sloughhouse	Outer Sacramento County	RD-4	23.37	$4,005,500	$171,395	Zoned for Development
Broadhead way	Sacramento	South Sacramento	RD-5	37.88	$4,141,000	$109,319	Zoned for Development
8488 Poppy Ridge Rd	Elk Grove	Elk Grove	RD-5	58.84	$18,000,000	$305,914	Zoned for Development
6803 S Watt Ave	Sacramento	Outer Sacramento County	RD-5-7	30.00	$3,000,000	$100,000	Zoned for Development
Navaho St	Antelope	Rio Linda/N Highlands	RD-7	61.00	$11,193,000	$183,492	Zoned for Development
000 Bilby Rd	Elk Grove	Elk Grove	SPASEPA	25.22	$9,980,000	$395,718	Zoned for Development
Watt Ave	Roseville	Roseville/Rocklin	SPL-RVSP	60.00	$20,252,000	$337,533	Zoned for Development
Gerber Rd	Sacramento	Outer Sacramento County	AG20	60.00	$1,500,000	$25,000	Undeveloped
9384 Florin Rd	Sacramento	Outer Sacramento County	AG-20	14.77	$1,175,000	$79,553	Undeveloped
9350 Sheldon Rd	Elk Grove	Elk Grove	AG-80	111.95	$3,000,000	$26,798	Undeveloped
9282 Gerber Rd	Sacramento	South Sacramento	AR10	38.21	$3,500,000	$91,599	Undeveloped
1 Cardwell Ave	Orangevale	Citrus Heights/Orangeval	AR-5	60.30	$2,100,000	$34,826	Undeveloped
3333 Nicolaus Rd	Lincoln	Roseville/Rocklin	F AO -BX-5 SP	19.34	$902,500	$46,665	Undeveloped
3333 Nicolaus Rd	Lincoln	Roseville/Rocklin	F AO -BX-5 SP	19.34	$810,000	$41,882	Undeveloped
Nelson Ln	Lincoln	Auburn/Lincoln	F-B-X	111.90	$16,480,000	$147,274	Undeveloped
2360 Pfe Rd	Roseville	Roseville/Rocklin	O, F-DR	136.00	$29,465,000	$216,654	Undeveloped
5500 Barton Rd	Loomis	Roseville/Rocklin	RA	39.72	$2,575,000	$64,829	Undeveloped
7778 Dick Cook Rd	Loomis	Roseville/Rocklin	RA-B-X	80.00	$4,000,000	$50,000	Undeveloped
3425 Marshall Rd	West Sacramento	West Sacramento	RE	60.00	$1,800,000	$30,000	Undeveloped
301 Jackson Slough Rd	Isleton	Outer Sacramento County	Z00	13.73	$910,000	$66,278	Undeveloped

Average Price Per Acre	
All Comparables	**$223,231**
Finished Lots	**$789,022**
Entitled	**$394,229**
Zoned for Development	**$266,606**
Undeveloped	**$130,140**

Source: CoStar; EPS.

[1] Submarkets are defined by CoStar and may not align with jurisdictional boundaries.
[2] Finished lots are subdivided and have utilities at the site. Entitled lots are subdivided but with no utilities. Lots zoned for development allow residential uses but do not have approved subdivision maps. Undeveloped lands are not zoned for residential development. Lot status reported by CoStar at the time of sale.