

Program Environmental Impact Report
May 2018

## *FINAL*

# **ENVIRONMENTAL IMPACT REPORT**

## FOR THE

## **FOLSOM GENERAL PLAN 2035**

# CITY OF FOLSOM DEPARTMENT OF COMMUNITY DEVELOPMENT

50 Natoma Street Folsom, CA 95630

Prepared with the Technical Assistance of:



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# TABLE OF CONTENTS

1.0	Introd	luction	1-1
	1.1	Purpose of the Environmental Impact Report	1-1
	1.2	Type of Environmental Impact Report	
	1.3	CEQA Process	
	1.4	Public Review	
	1.5	City Consideration of the 2035 General Plan	
	1.6	Comments that Require Repsonses	
	1.7	Mitigation Monitoring and Reporting Program	
2.0	Execu	itive Summary	2-1
	2.1	Project Summary	
	2.2	Summary of Project Alternatives	
	2.3	Summary of Environmental Impacts and Mitigation Measures	2-1
3.0	Public	Comments and Response to Comments	3-1
	3.1	Public Comments and Responses	3-1
4.0	Chang	ges to Text of the Environmental Documents	4-1
	4.1	Changes to the Draft Program Environmental Impact Report	4-1
		Ат	TACHMENTS
Attac	chment A	Revised Appendix H, Global Climate Change, of the Draft Program En Impact Report	ıvironmental
List	of Ta	BLES	
Table		Summary of Impacts and Mitigation Measures	
Table	e 2-2	Potential Impacts Determined to be Less-than-significant or No Impact	2-23

Table of Contents

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#### 1.1 Purpose of the Environmental Impact Report

CEQA requires the evaluation of government actions or private activities permitted by government to determine their effects on the environment. When such an action could have a significant effect on the environment, the agency with primary responsibility over the approval of the project (the lead agency) is required to prepare an Environmental Impact Report (EIR). As stated in CEQA Guidelines Section 15121:

An EIR is an informational document which will inform public agency decision-makers and the public generally of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. The public agency shall consider the information in the EIR along with other information which may be presented to the agency (when considering whether to approve a project).

An EIR is the public document used to meet these requirements. The EIR must disclose: significant adverse environmental impacts that cannot be avoided; growth inducing impacts; effects not found to be significant; and significant cumulative impacts of all past, present, and reasonably foreseeable future projects. For this EIR, an "impact" or "significant impact" is assumed to be an adverse effect on the environment.

Prior to considering adoption of the 2035 General Plan, the City of Folsom (City), the lead agency for the project, must certify that the EIR is adequate under CEQA, and that City decision makers have considered the information therein. If significant environmental effects are identified, the lead agency must adopt "Findings" indicating whether feasible mitigation measures or alternatives exist that can avoid or reduce those effects. If the significant environmental impacts are identified as significant and unavoidable, the City may still approve the project if it determines that social, economic, legal, technological, or other factors override the unavoidable impacts. The City would then be required to prepare a "Statement of Overriding Considerations" that discusses the specific reasons for approving the project, based on information in the EIR and other information in the record. Upon making these findings, the City may then consider adoption of the 2035 General Plan.

#### 1.2 Type of Environmental Impact Report

This EIR is being prepared as a "Program" EIR pursuant to the State CEQA Guidelines Section 15168(a)(3) that states:

A Program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related ... [i]n connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program.

Therefore, a Program EIR is an EIR which may be prepared on a large-scale planning document such as the 2035 General Plan, that provides the framework for specific projects to be developed in accordance with identified land use patterns. Program EIRs are not project-specific, and do not evaluate the potential impacts of specific development projects that may be allowed in the 2035 General Plan.

Although the legally required contents of a Program EIR are the same as those of a Project EIR, in practice, there are differences in level of detail. General Plans by their nature are broad, long-range, and conceptual. Program EIRs are typically conceptual and abstract. They contain a more general discussion of impacts, alternatives, and mitigation measures than do project-level EIRs. A Program EIR is appropriate for the 2035 General Plan because the 2035 General Plan is meant to guide longterm development within the City of Folsom's General Plan planning area (the "project site," as defined by CEQA)<sup>1</sup>. The 2035 General Plan does not dictate specific site-planning requirements, internal transportation networks, or other project-level details. The City acknowledges and intends to make best use of the advantages to the programmatic approach to environmental analysis and reporting in this Program EIR.

#### 1.3 **CEQA PROCESS**

In preparing an EIR, the California Environmental Quality Act (CEQA) requires public agencies to circulate a Draft EIR (DEIR), in this case a Draft Program EIR (DPEIR), for public and agency review and comment. The public agency then uses the comments obtained by this review to modify or correct the DPEIR for subsequent use in project review and consideration. The document containing the text of any comments received on the DPEIR, the responses of the lead agency to these comments, and any corrections or amendments to the DPEIR is termed the Final Program EIR (FPEIR).

#### 1.4 Public Review

CEQA provides three opportunities for public participation during the environmental review process. These points are: (1) during the Notice of Preparation (NOP), when the public is informed that an EIR is to be prepared, and is requested to comment on the scope and contents of the proposed EIR; (2) upon circulation of the Draft EIR, when the public and agencies can comment on the adequacy of the environmental document; and (3) finally, after circulation of the Final EIR, when the public and agencies can evaluate the lead agency's responses to comments submitted on the Draft EIR.

In accordance with Section 15082(a) of the State CEQA Guidelines, the City prepared and circulated a NOP of the DPEIR for the proposed 2035 General Plan project. The Notice of Preparation for the 2035 General Plan DPEIR was published on August 18, 2017. The NOP and Project Description were circulated to the public, local and state agencies, and other interested parties to solicit comments on the 2035 General Plan. On September 13, 2017 the City held a scoping meeting for the DPEIR consistent with State CEQA Guidelines Section 15082(c), and closed the period for public comment on the NOP on September 18, 2017.

The DPEIR for the 2035 General Plan was circulated locally and with the State Clearinghouse from March 7, 2018 to April 20, 2018. During this time, the DPEIR and its Appendices were available for download from the 2035 General Plan website at:

http://folsom2035.com/documents/

City of Folsom 1-2 May 2018

For more information regarding the 2035 General Plan planning area, and the area assessed in the DPEIR, see Chapter 3, Project Description, and Chapter 5, Introduction to the Environmental Analysis, of the DPEIR.

Printed copies of the DPEIR and its supporting documents were made available at the City of Folsom Department of Planning and Community Development, 50 Natoma Street, Folsom, California 95630. In addition, the City held a Study Session open to the public before the City of Folsom Planning Commission on March 21, 2018 during the DPEIR public circulation period.

The City accepted written comments on the DPEIR during this public circulation period. This FPEIR has been prepared to respond to the comments received on the DPEIR for the 2035 General Plan project. It is an informational document that must be considered and certified by the lead agency prior to considering approval of the 2035 General Plan project.

Consistent with the requirements of Section 15132 of the CEQA Guidelines, this FPEIR includes:

- The DPEIR published on March 7, 2018 (incorporated by reference);
- A list of persons, organizations, and public agencies commenting on the DPEIR;
- Comments received on the DPEIR;
- The response of the City of Folsom to significant environmental issues raised in the review and consultation process; and,
- Modifications to the DPEIR arising from the City's response to comments received on the DPEIR.

#### 1.5 CITY CONSIDERATION OF THE 2035 GENERAL PLAN

After the DPEIR public circulation period closed, the City prepared responses to all written comments submitted during the comment period. The DPEIR, the comments and responses, including any revisions of the DPEIR contained therein, together with a Mitigation Monitoring and Reporting Program (MMRP) as described below, constitute the FPEIR that the City will evaluate for certification. The City's evaluation will be based on review and consideration of the FPEIR and other evidence presented in the public record. City staff will make recommendations to the Planning Commission, who will in turn make recommendations to the City Council regarding the adequacy of the FPEIR and the merits of the proposed 2035 General Plan. The City Council will review the FPEIR for adequacy and consider it for certification, pursuant to the requirements of Section 15090 of the State CEQA Guidelines.

Prior to certification of the FPEIR, the City will prepare written findings of fact for each significant environmental impact identified in the FPEIR, which in turn must be supported by substantial evidence in the administrative record. For each significant impact, the City must make one of the following findings:

- Determine that changes in the project have been made to substantially reduce the magnitude of the impact;
- Determine that the changes to the project are within another agency's jurisdiction, and have been or should be adopted; or,
- Find that specific economic, social, legal, technical, or other considerations make mitigation measures or alternatives infeasible (State CEQA Guidelines Section 15091(a)).

After considering the FPEIR in conjunction with making findings, if implementation of the 2035 General Plan would result in significant environmental impacts after imposition of feasible mitigation measures, the City may approve the 2035 General Plan if the benefits of the Plan

outweigh the unavoidable environmental effects. Under these circumstances, a Statement of Overriding Considerations would be prepared to explain why the City is willing to accept each significant effect (State CEQA Guidelines Section 15093).

## 1.6 COMMENTS THAT REQUIRE RESPONSES

Section 15088(c) of the State CEQA Guidelines specifies that the focus of the responses to comments shall be on the disposition of significant environmental issues. Responses are not required on comments regarding the merits of the proposed 2035 General Plan or on issues not related to environmental impacts. Comments on the merits of the proposed 2035 General Plan or other comments that do not raise environmental issues are noted in the responses, and will be reviewed by the City Council before it takes any action on whether to approve the proposed 2035 General Plan update. When a comment does not directly pertain to the environmental issues analyzed in the DPEIR, does not ask a question about the adequacy of the analysis contained in the DPEIR, or does not challenge an element of or conclusion of the DPEIR, the response will note the comment and provide additional information where possible. The staff report prepared as part of the hearing process will address non-environmental comments and the policies that could be affected.

#### 1.7 MITIGATION MONITORING AND REPORTING PROGRAM

CEQA requires that when a public agency makes findings based on a PEIR, the public agency must adopt a MMRP based on those measures that the agency has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment (PRC Section 21081.6). The reporting or monitoring plan must be designed to ensure compliance with the adopted measures during project implementation (PRC Section 21081.6). The MMRP for this project has been prepared and circulated under separate cover for consideration by the City in conjunction with certification of the FPEIR.

## 2.1 PROJECT SUMMARY

The project would include all actions necessary to update the 1988 Folsom General Plan (1988 Plan), including reorganizing and updating the existing Plan's eleven chapters, which together address the mandatory General Plan elements required by state planning laws and five additional chapters on matters of local interest. The proposed 2035 Folsom General Plan (2035 General Plan) project would include seven mandatory chapters and two additional chapters on economic prosperity and public facilities and services, as well as revised Land Use and Circulation Diagrams. There are no "disadvantaged communities" in the City of Folsom, thus no Environmental Justice Element (SB 1000) is required for the 2035 General Plan. The 2035 General Plan Housing Element was previously updated in 2013 in compliance with state deadlines (see Chapter 3, *Project Description*). The 2035 General Plan is a legal document that serves as the City of Folsom's "blueprint" or "constitution" for all future land use, development, preservation, and resource conservation decisions.

## 2.2 SUMMARY OF PROJECT ALTERNATIVES

Section 15126.6 of the California Environmental Quality Act (CEQA) Guidelines requires that an Environmental Impact Report (EIR) describe and comparatively evaluate a range of reasonable alternatives to a project that 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. Thus, the range of alternatives evaluated in the following analysis is dictated by the range of significant impacts identified in this Draft Program EIR (DPEIR), and evaluated alternatives are limited to those that would reduce or eliminate identified environmental impacts. As discussed in this DPEIR (Chapter 20, *Alternatives Analysis*), there are 37 secondary or indirect impacts of implementing the 2035 General Plan project that would result in significant impacts. Three alternatives were selected to illustrate potential alternatives to the 2035 General Plan project.

- Alternative 1 No Project Alternative
- Alternative 2 Deletion of Planning Area 2
- Alternative 3 Amendment of the River District and Planning Area 1

Based on the comparative evaluation contained in the DPEIR, Alternative 3 (Amend the River District and Planning Area 1) would reduce the magnitude of the most impacts as an action alternative. Alternative 3 would be the environmentally superior alternative.

#### 2.3 SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Table 2-1 presents a summary of potentially significant project impacts and proposed mitigation measures that would avoid or minimize potential impacts. The level of significance for each environmental impact both before and after mitigation is indicated. Table 2-2 lists those impacts that have been determined to result in no impact or a less-than-significant impact within the meaning of State CEQA Guidelines Appendix G significance criteria. For a detailed discussion of the potentially significant impacts and mitigation measures of the 2035 General Plan, see Chapters 6 through 21 of the DPEIR and Chapter 4 of this FPEIR.

Table 2-1 Summary of Impacts and Mi	tigatio	n Mea	sures		
Environmental Impact	Signif Be:	el of icance fore gation	Mitigation Measure/Alternative	Signi A	vel of ficance fter gation
	LS	S		LS	SU
Aesthetics and Visual Resources					
<b>Impact AES-1:</b> Adverse effect on a scenic vista or substantially degrade the scenic character.		S	Mitigation Measure AES-1: None available.		SU
<b>Impact AES-2:</b> Damage to scenic resources within a scenic corridor.		S	Mitigation Measure AES-2: None available.		SU
Impact AES-3: Create new source of light or glare that would adversely affect day or nighttime views.		S	Add new Policy NCR 2.1.3: Light Pollution Reduction.  The City shall minimize obtrusive light by limiting outdoor lighting that is misdirected, excessive, or unnecessary, and requiring light for development to be directed downward to minimize overspill and glare onto adjacent properties and reduce vertical glare.  Mitigation Measure AES-3b:  Add new Implementation Program NCR 6: Lighting Design Standards.  Establish consistent lighting standards for outdoor lighting of city development to reduce high-intensity nighttime lighting and glare. These standards shall be consistent with the Folsom Plan Area Specific Plan Community Design Guidelines. Additional standards shall be considered, including the use of automatic shutoffs or motion sensors for lighting features to further reduce excess nighttime light.  To reduce impacts associated with light and glare, the City will require the following lighting standards:  Shield or screen lighting fixtures to direct the light downward and prevent light spill on adjacent properties.  Place and shield or screen flood and area lighting needed for construction activities and/or security so as not to disturb adjacent residential areas and passing motorists.  For public street, building, parking, and landscape lighting in residential neighborhoods, prohibit the use of light fixtures that are of unusually high		SU

Environmental Impact		el of icance fore gation	Mitigation Measure/Alternative		vel of ficance fter gation
	LS	S		LS	SU
			<ul> <li>intensity or brightness (e.g., harsh mercury vapor, low-pressure sodium, or fluorescent bulbs) or that blink or flash. For public parks and sports facilities, the City will use the best light and glare control technology feasible, along with sensitive site design.</li> <li>Use appropriate building materials (such as low-glare glass, low-glare building glaze or finish, neutral, earth-toned colored paint and roofing materials), shielded or screened lighting, and appropriate signage in the office/commercial areas to prevent light and glare from adversely affecting motorists on nearby roadways.</li> <li>Implementing Policy: NCR 2.1.3.</li> </ul>		
Agriculture and Forestry Resources					
Impact AG-1: Potential conflicts with existing agricultural operations and Williamson Act Contracts adjacent to the 2035 Plan Evaluation Area.		S	Mitigation Measure AG-1: None available.		SU
Air Resources					
Impact AQ-1: Increase in construction-related emissions of criteria air pollutants and precursors associated with 2035 General Plan buildout.	LS		Mitigation Measure AQ-1: None required.	LS	
Impact AQ-2: Increase in operational emissions of criteria air pollutants and precursors associated with 2035 General Plan buildout that could contribute to a violation of air quality standards.		S	Mitigation Measure AQ-2: Modify Policy NCR 3.1.5: Emission Reduction Threshold for New Development.  Require all new development projects that exceed SMAQMD's thresholds of significance to incorporate design, construction material, and/or other operational features that will result in a minimum of 15 percent reduction in emissions when compared to an "unmitigated baseline" project.		SU
			Mitigation Measure AQ-2b: Implement Mitigation Measures GHG-1 through GHG-17.		

Environmental Impact		el of icance fore gation	Mitigation Measure/Alternative	Signi A	vel of ficance fter gation
	LS	S		LS	SU
<b>Impact AQ-3</b> : Consistency with air quality planning efforts.	LS		Mitigation Measure AQ-3: None required.	LS	
Impact AQ-4: Increase in local mobile-source emissions of carbon monoxide.	LS		Mitigation Measure AQ-4: None required.	LS	
<b>Impact AQ-5</b> : Increase in health risks associated with exposure of sensitive receptors to emissions of toxic air contaminants.		S	Mitigation Measure AQ-5: None available.		SU
Impact AQ-6: Increase in exposure of sensitive receptors to emissions of odors.		S	Mitigation Measure AQ-6: Modify Policy NCR 3.1.6: Sensitive Uses. Coordinate with SMAQMD in evaluating exposure of sensitive receptors to toxic air contaminants and odors, and will impose appropriate conditions on projects to protect public health and safety so as to comply with the requirements of SMAQMD for the exposure of sensitive receptors to toxic air contaminants and odors.		SU
Biological Resources					
Impact BIO-1: Have a substantial adverse effect on special-status species.		S	Mitigation Measure BIO-1: Modify Policy NCR 1.1.1: Habitat Preservation.  Support State and Federal policies for preservation and enhancement of riparian and wetland habitats by incorporating, as applicable, as deemed appropriate, standards published by the California Department of Fish and Wildlife and the U.S. Fish and Wildlife Service into site-specific development proposals.		SU
<b>Impact BIO-2:</b> Have a substantial adverse effect on riparian habitat or other sensitive natural communities.	LS		Mitigation Measure BIO-2: None required.	LS	
<b>Impact BIO-3:</b> Have a substantial adverse effect on federally protected wetlands.		S	Mitigation Measure BIO-3: Implement Mitigation Measure BIO-1.		SU
<b>Impact BIO-4:</b> Interfere with the movement of migratory fish or wildlife species.	LS		Mitigation Measure BIO-4: None required.	LS	

Environmental Impact	Level of Significance Before Mitigation		Mitigation Measure/Alternative	Signi A	vel of ficance fter gation
	LS	S		LS	SU
Cultural Resources					
Impact CUL-1: Cause a substantial adverse change		S	Mitigation Measure CUL-1:		SU
in the significance of a historical resource.			None available.		
Impact CUL-2: Cause a substantial adverse change in the significance of an archaeological resource.		S	Mitigation Measure CUL-2: Add new Implementation Program NCR 7: Management of Inadvertently Discovered Cultural Resources.  Develop a program for the management of inadvertently discovered cultural resources. The program will consist of, but will not necessarily be limited to the following standards:  The City will require, through permit or tentative map conditions or contractual obligations, that in the event of any inadvertent discovery of archaeological resources, all such finds will be subject to PRC 21083.2 and CEQA Guidelines 15064.5. Procedures for inadvertent discovery are listed below.  In the event of the inadvertent discovery of previously unknown archaeological sites during excavation or construction, all construction affecting the site shall cease and the contractor shall contact the City.  • All work within 100 feet of the find will be halted until a professional archaeologist can evaluate the significance of the find in accordance with NRHP and CRHR criteria.  • If any find is determined to be significant by the archaeologist, representatives of the City will meet with the archaeologist to determine the appropriate course of action. If necessary, a Treatment Plan will be prepared by an archeologist, outlining recovery of the resource, analysis, and reporting of the find. The Treatment Plan will be submitted to the City for review and approval prior to resuming		SU

Table 2-1 Summary of Impacts and Mi	tigatio	on Mea	asures		
Environmental Impact		el of icance fore gation	Mitigation Measure/Alternative	Signi:	vel of ficance fter gation
	LS	S		LS	SU
Impact CUL-3: Damage or destruction of previously unknown unique paleontological resources during construction-related activities.		S	Mitigation Measure CUL-3:  Add new Implementation Program NCR 8: Management of Paleontological Resources.  Develop a program for the management of paleontological resources. The program will consist of, but will not necessarily be limited to, the following standards and requirements:  Prior to approval of a discretionary project, it shall be determined through literature review and records research, the paleontological sensitivity of the geologic units affected by the project. If paleontological resources may be present, conditions will be added to the project approval to monitor for and salvage paleontological resources during ground-disturbing activities.	LS	
Impact CUL-4: Disturb interred human remains during construction.	LS		Mitigation Measure CUL-4: None required.	LS	
Geology, Soils, and Mineral Resources					
Impact GEO-1: Expose people or structures to risk from seismic hazards, including strong groundshaking and liquefaction.	LS		Mitigation Measure GEO-1: None required.	LS	
<b>Impact GEO-2:</b> Result in substantial soil erosion or topsoil loss from heightened exposure to wind or water erosion.	LS		Mitigation Measure GEO-2: None required.	LS	
<b>Impact GEO-3:</b> Potential geologic hazards related to unstable soils.	LS		Mitigation Measure GEO-3: None required.	LS	
<b>Impact GEO-4:</b> Result in the loss of availability of a locally-important mineral resource recovery site.		S	Mitigation Measure GEO-4: None available.		SU

Table 2-1 Summary of Impacts and M	Mitigatio	on Mea	asures			
Environmental Impact	Level of Significance Before Mitigation				evel of ificance After igation	
	LS	S		LS	SU	
Global Climate Change						
Impact GHG-1: Potential to conflict with an applicable plan, policy, or regulation adopted for reducing GHG emissions.		S	Mitigation Measure GHG-1:  Add new Implementation Program PFS-22 Renewable Energy in City-Operated Buildings.  Strive to supplement 25 percent of city-owned building energy demand through on-site or off-site renewable energy sources. On-site sources may include solar panels or other types of renewable energy systems on rooftops or parking areas, and on-site energy storage. Off-site sources could include combinations of equivalent renewable energy generation systems, power purchase agreements, or other off-site programs offered by energy utilities (e.g., SMUD's Greenergy or SolarShares programs).  Implementing Policy: PFS 8.1.3.	LS		
			Mitigation Measure GHG-2:			
			Add new Policy PFS 8.1.9 Water Heater Replacement.  Encourage the use of high-efficiency or alternatively-powered water heater replacements at time of replacement in existing residential development.			
			Add new Implementation Program PFS-23 High-Efficiency or Alternatively-Powered.Water Heater Replacement Program.  Provide educational material and information on the City's website, as well as through the permit and building department, on the various high-efficiency and alternatively-powered water heat replacement options available to current homeowners considering water heater replacement; develop appropriate financial incentives, working with energy utilities or other partners; and, streamline the permitting process. Replacement water heaters could include high-efficiency natural gas (i.e., tankless), or other alternatively-powered water heating systems that reduce or eliminate natural gas usage such as solar water			

Table 2-1 Summary of Impacts and Mi	tigatio	on Mea	asures		
Environmental Impact	Level of Significance Before Mitigation		Mitigation Measure/Alternative	Signif At	rel of ficance fter gation
	LS	S		LS	SU
			heating systems, tankless or storage electric water heaters, and electric heat pump systems.		
			Implementing Policy: PFS 8.1.9.		
			Mitigation Measure GHG-4:		
			Add new Implementation Program PFS-24 Energy Efficiency and Renewable Energy Retrofits and Programs.		
			Strive to increase energy efficiency and renewable energy use in existing		
			buildings through participation in available programs. Actions include:		
			<ul> <li>Establish a dedicated City program with a clear intent to provide support and promote available green building and energy retrofit programs for existing buildings.</li> <li>Incentivize solar installation on all existing buildings that undergo major remodels or renovations, and provide permit streamlining for solar retrofit projects.</li> <li>Provide rebates or incentives to existing SMUD customers for enrolling in the existing Greenergy program.</li> <li>Provide education to property owners on low-interest financing and/or assist property owners in purchasing solar photovoltaics through low-interest loans or property tax assessments.</li> <li>Continue to work with SMUD and other private sector funding sources to increase solar leases or power purchase agreements (PPAs).</li> <li>Implementing Policies: PFS 8.1.3, PFS 8.1.5, PFS 8.1.4.</li> </ul>		
			Mitigation Measure GHG-5:		
			Modify Policy LU 1.1.13 Sustainable Building Practices.		
			Promote and, where appropriate, require sustainable building practices (e.g., LEED certification) that incorporate a "whole system" approach to designing and constructing buildings that consume less energy, water, and other resources; facilitate natural ventilation; use daylight effectively; and, are healthy, safe, comfortable, and durable.		

Environmental Impact	Level of Significance ental Impact Before Mitigation		Mitigation Measure/Alternative		rel of ficance fter gation
	LS	S		LS	SU
			Add new Implementation Program LU-6 Adopt Green Building.  Encourage new residential and non-residential construction projects to adopt and incorporate green building features included in the CALGreen Tier 1 checklist in project designs; and, encourage projects to seek LEED rating and certification that would meet equivalent CALGreen Tier 1 standards or better.  Consider future amendments to City code to adopt CALGreen Tier 1 requirements consistent with State building code. For projects subject to CEQA seeking to streamline GHG analysis consistent with the General Plan, CALGreen Tier 1 compliance would be required.  Implementing Policy: LU 1.1.13.		
			Mitigation Measure GHG-7:  Add new Implementation Program LU-7 Encourage Zero Net Energy.  Encourage Zero Net Energy (ZNE) building design for new residential and non-residential construction projects. Consider future amendments to City code to adopt ZNE requirements consistent with the State building code. For projects subject to CEQA seeking to streamline GHG analysis consistent with the general plan, achievement of ZNE would be required consistent with provisions in the State building code under California Code of Regulations, Title 24, Part 6.  Implementing Policy: LU 1.1.13.		
			Mitigation Measure GHG-8:  Add new Implementation Program PFS-25 Zero Net Energy Development.  Adopt an ordinance to require ZNE for all new residential construction by 2020 and commercial construction by 2030, in coordination with State actions to phase in ZNE requirements through future triennial building code updates.  Implementing Policies: NCR 3.2.3, LU 9.1.10, LU 1.1.13, LU 1.1.14.		

Table 2-1 Summary of Impacts and Mi	tigatio	n Mea	asures		
Environmental Impact	Level of Significan Environmental Impact Before Mitigatio		Mitigation Measure/Alternative		rel of ficance fter gation
	LS	S		LS	SU
			Mitigation Measure GHG-9:		
			Add new Implementation Program PFS-26 Renewable Diesel.		
			Revise the City of Folsom's Standard Construction Specifications to require that all construction contractors use high-performance renewable diesel for both private and City construction. Phase in targets such that high-performance renewable diesel would comprise 50 percent of construction equipment diesel usage for projects covered under the specifications through 2030, and 100 percent of construction equipment diesel usage in projects covered under the specifications by 2035. For projects subject to CEQA seeking to streamline GHG analysis consistent with the general plan, the use of high-performance renewable diesel would be required consistent with the above targets.  Implementing Policy: NCR 3.2.7.		
			Mitigation Measure GHG-10:  Modify Implementation Program M-1 Transportation Demand Management.		
			Adopt a citywide Transportation Demand Management (TDM) program that encourages residents to reduce the amount of trips taken with single-occupancy vehicles. The program shall be designed to achieve an overall 15 percent vehicle mile traveled (VMT) reduction over 2014 levels and a 20 percent reduction in City-employee commute VMT. The City shall coordinate with employers to develop a menu of incentives and encourage participation in TDM programs.		
			Implementing Policy: M 1.1.9, NCR 3.1.3.		
			Mitigation Measure GHG-11:		
			Modify Implementation Program PFS-14 Energy Efficient Fleet.		
			Continue purchasing alternative fuel/technology vehicles when replacing vehicles in the City's existing municipal fleet. <u>Use high-performance renewable diesel in 100 percent of existing (2014) and future diesel on-road vehicles and convert entire on-road gasoline vehicles to electric by 2035.</u>		
			Implementing Policy: PFS 8.1.8.		

Environmental Impact	Level of Significance Before Mitigation		Mitigation Measure/Alternative	Level o Significa After Mitigatio	
	LS	S		LS	SU
			Mitigation Measure GHG-12:		
			Modify Policy M 1.1.4 Existing Streets Retrofits.		i
			Actively pursue funding to update existing streets <u>and intersections</u> with new bikeways, sidewalks, and exclusive transit lanes, where these facilities are designated in the Bikeway Master Plan, Pedestrian Master Plan, or Transit Master Plan.		
			Mitigation Measure GHG-13:		
			Modify Implementation Program M-8 Bicycle and Pedestrian Funding.		
			Identify regional, State, and federal funding sources to support bicycle and pedestrian facilities and programs to improve roadways and intersections by 2035. Actions include:		
			• Require bicycle and pedestrian improvements as conditions of approval for new development on roadways and intersections serving the project. Improvements may include, but are not limited to: on-street bike lanes, traffic calming improvements such as marked crosswalks, raised intersections, median islands, tight corner radii, roundabouts, on-street parking, planter strips with street trees, chicanes, chokers, any other improvement that focuses on reducing traffic speeds and increasing bicycle and pedestrian safety. For projects subject to CEQA seeking to streamline GHG analysis consistent with the general plan, incorporation of applicable bicycle and pedestrian improvements into project designs or conditions of approval would be required.		
			Based on the most recent citywide inventory of roadways and pedestrian/bicycle facilities, identify areas of greatest need, to focus improvements on first. Areas to prioritize include roadways or intersections with a lack of safety features, street where disruption in sidewalks or bicycle lanes occurs, areas of highest vehicle traffic near commercial centers and transit facilities, where increased use of pedestrian/bicycle facilities would be most used.		

Table 2-1 Summary of Impacts and Mi	tigatio	n Mea	asures		
Environmental Impact	Level of Significance Before Mitigation		cance ore Mitigation Measure/Alternative		rel of ficance fter gation
	LS	S		LS	SU
			<b>Implementing Policies:</b> M 2.1.15, <u>M 1.1.4</u> , <u>M 1.1.6</u> , <u>M 1.1.5</u> , <u>M 2.1.2</u> , <u>M 2.1.3</u> , <u>M 2.1.4</u> .		
			Mitigation Measure GHG-14:		
			Modify Policy PFS 9.1.3 Recycling Target.		
			Support efforts to recycle at least 75 percent of solid waste by 2020. achieve a citywide disposal rate of 1.5 pounds per person per day, exceeding statewide target of 2.7 pounds per person per day by 2035.		
			Mitigation Measure GHG-15:		
			<ul> <li>Add new Implementation Program PFS-27 Reduce Water Consumption in New Development.</li> <li>Encourage water efficiency measures for new residential construction to reduce indoor and outdoor water use. Actions include:</li> <li>Promote the use of higher efficiency measures, including: use of low-water irrigation systems, and installation of water-efficient appliances and plumbing fixtures;</li> <li>Measures and targets can be borrowed from the latest version of the Guide to the California Green Building Standards Code (International Code Council)</li> <li>For projects subject to CEQA seeking to streamline GHG analysis consistent with the general plan, compliance with CALGreen Tier 1 Water Efficiency and Conservation measures would be required.</li> <li>Implementing Policies: PFS 3.1.3, PFS 3.1.9.</li> </ul>		
			Mitigation Measure GHG-16:  Add new Policy NCR-3.2.8: GHG Analysis Streamlining for Projects  Consistent with the General Plan.  Projects subject to environmental review under CEQA may be eligible for tiering and streamlining the analysis of GHG emissions, provided they are		

Environmental Impact		el of icance fore gation	Mitigation Measure/Alternative		vel of ficance fter gation
	LS	S		LS	SU
			<ul> <li>consistent with the GHG reduction measures included in the General Plan and EIR. The City may review such projects to determine whether the following criteria are met:         <ul> <li>Proposed project is consistent with the current general plan land use designation for the project site;</li> <li>Proposed project incorporates all applicable GHG reduction measures (documented in the Climate Change Technical Appendix to the General Plan EIR) as enforceable mitigation measures in the CEQA document prepared for the project; and,</li> <li>Proposed project clearly demonstrates the method, timing and process for which the project will comply with applicable GHG reduction measures and/or conditions of approval, (e.g., using a CAP/GHG reduction measures consistency checklist, mitigation monitoring and reporting plan, or other mechanism for monitoring and enforcement as appropriate).</li> </ul> </li> </ul>		
Impact GHG-2: Potential to conflict with long-term statewide GHG emissions reduction goals for 2050.		S	Mitigation Measure GHG-17:  Modify Policy NCR 3.2.5 Climate Change Assessment and Monitoring.  Continue to assess and monitor performance of GHG emissions reduction efforts beyond for 2020, 2030, and beyond, including progress toward meeting longer-term GHG emissions reduction goals for 2035 and 2050 by reporting on the City's progress annually, updating the GHG inventory and forecasts at least every five years, and preparing updates to the GHG Strategy in the General Plan, as appropriate; as well as assess and monitor the effects of climate change and associated levels of risk in order to plan a community that can adapt to changing climate conditions and be resilient to negative changes and impacts.		SU
Impact GHG-3: Climate change adaptation.	LS		Mitigation Measure GHG-3: None required.	LS	

Environmental Impact		el of icance fore gation	Mitigation Measure/Alternative	Level of Significand After Mitigation	
	LS	S		LS	SU
Hazards and Hazardous Materials					
<b>Impact HZ-1:</b> Exposure of people to hazards and hazardous materials during construction.	LS		Mitigation Measure HZ-1:  None required.	LS	
<b>Impact HZ-2:</b> Routine transport, use, or disposal of hazardous materials or accidental release of hazardous materials.	LS		Mitigation Measure HZ-2:  None required.	LS	
Impact HZ-3: Hazards to the public or environment from development at a known hazardous materials site identified pursuant to Government Code Section 65962.5.	LS		Mitigation Measure HZ-3: None required.	LS	
Impact HZ-4: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	LS		Mitigation Measure HZ-4: None required.	LS	
<b>Impact HZ-5:</b> Expose people or structures to a significant risk of loss, injury, or death involving wildland fires.		S	Mitigation Measure HZ-5: Add new Policy SN 4.1.4: Wildland Fire Risk Reduction.  To reduce the risk of wildland fire, continue to implement Wildland-Urban Interface Building Standards, vegetative fuels management, evacuation planning, and public education.	LS	
Hydrology and Water Quality					
Impact HWQ-1: Violate water quality standards or waste discharge requirements, or otherwise substantially degrade water quality.	LS		Mitigation Measure HWQ-1: None required.	LS	
Impact HWQ-2: Substantially alter drainage patterns leading to erosion or siltation.	LS		Mitigation Measure HWQ-2: None required.	LS	

Environmental Impact		el of icance fore gation	Mitigation Measure/Alternative		vel of ficance fter gation
	LS	S		LS	SU
<b>Impact HWQ-3:</b> Alter the course of a stream or river increasing runoff resulting in flooding.		S	Mitigation Measure HWQ-3a: Modify Policy SN 3.1.1: 100-Year Floodway.	LS	
			SN 3.1.1: 100-Year 200-Year Floodway.  Regulate new development or construction within the 100-year 200-year floodway to assure that the water flows upstream and downstream from the new development or construction will not be altered from existing levels.		
			Mitigation Measure HWQ-3b: Modify Policy SN 3.1.4: Flood Control Costs. Minimize new development in the 100 year 200-year floodway to reduce the long-term public costs of building and maintaining flood control improvements, as required by FEMA and state law.		
			Mitigation Measure HWQ-3c:		
			Modify City of Folsom Municipal Code Section 14.32 so as to be in compliance with the provisions of SB 5 that require urban areas to provide a 200-year level of flood protection.		
Impact HWQ-4: Contribute runoff that exceeds		S	Mitigation Measure HWQ-4:	LS	
stormwater drainage capacity or contributes additional polluted runoff.			Implement Mitigation Measures HWQ-3a, HWQ-3b, and HWQ-3c.		
Impact HWQ-5: Place housing or other structures		S	Mitigation Measure HWQ-5:	LS	
within 100-year flood hazard area.			Implement Mitigation Measures HWQ-3a, HWQ-3b, and HWQ-3c.		
Impact HWQ-6: Expose people or structures to	LS		Mitigation Measure HWQ-6:	LS	
significant risk due to flooding.			None required.		
Noise and Vibration					
Impact NSE-1: Exposure of persons to, or generation of, noise levels in excess of standards established in the local general plan, noise ordinance, or applicable standards of other agencies; or a substantial permanent increase in ambient noise levels		S	Mitigation Measure N-1: Add Implementation Program SN-1: Adopt a Noise Reduction Program.  The City shall adopt a citywide noise reduction program to reduce traffic noise levels along roadways where significant increases in traffic noise levels are expected to occur. The program shall include, but shall not be		SU

Table 2-1 Summary of Impacts and Mi	tigatio	n Mea	sures		
Environmental Impact	Level of Significance Before Mitigation		Mitigation Measure/Alternative		vel of ficance fter gation
	LS	S		LS	SU
			<ul> <li>Noise barrier retrofits</li> <li>Truck usage restrictions</li> <li>Reduction of speed limits</li> <li>Use of quieter paving materials</li> <li>Building façade sound insulation</li> <li>Traffic calming</li> <li>Additional enforcement of speed limits and exhaust noise laws</li> <li>Signal timing.</li> </ul>		
<b>Impact N-2:</b> A substantial temporary increase in ambient noise levels in the project vicinity above levels without the project.	LS		Mitigation Measure N-2: None required.	LS	
Impact N-3: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, exposure of people residing or working in the area to excessive noise levels resulting from the proposed project.		S	Mitigation Measure N-3: Require private developers to provide disclosure statements to all prospective residents in the area south of US Highway 50, notifying them of the presence of Mather Airport to the southwest, of routine aircraft overflights associated with Mather operations, including early morning and late night operations, and of temporarily elevated noise levels during such overflights.	LS	
<b>Impact N-4:</b> Implementation of 2035 General Plan policies related to noise and vibration.	LS		Mitigation Measure N-4: None required.	LS	
Public Services and Recreation Resources					
<b>Impact PSR-1</b> : Physical impacts associated with the provision of new or altered governmental facilities.	LS		Mitigation Measure PSR-1: None required.	LS	
<b>Impact PSR-2</b> : Increased use of parks or other recreational facilities that would cause deterioration of these resources – City of Folsom facilities.	LS		Mitigation Measure PSR-2: None required.	LS	
<b>Impact PSR-3:</b> Require construction or expansion of recreational facilities that might have an adverse physical effect on the environment – City of Folsom facilities.	LS		Mitigation Measure PSR-3: None required.	LS	

Environmental Impact	Level of Significance Before Mitigation		Mitigation Measure/Alternative	Level of Significan After Mitigation	
	LS	S		LS	SU
Impact PSR-4: Require construction or expansion of recreational facilities that might have an adverse physical effect on the environment – State and Regional facilities.		S	Mitigation Measure PSR-4a: Modify Policy LU 1.1.10: Network of Open Space. Ensure designated open space is connected whenever feasible with the larger community and regional network of natural systems, recreational assets, and viewsheds.	LS	
			Mitigation Measure PSR-4b:		
			Modify Goal LU 5.1.		
			Support the <u>appropriate</u> enhancement of Folsom's riverfront areas for current and future residents in order to increase public access, recreational opportunities, and economic development <u>in consultation with federal, State, and regional public lands management agencies</u> .		
			Mitigation Measure PSR-4c:		
			Modify Policy LU 5.1.1: River District Overlay.		
			Apply a River District Overlay designation to the riverfront areas of Folsom outside of the boundaries of the Folsom Lake State Recreation Area, Folsom Powerhouse State Historic Park, and American River Parkway to elevate the importance of the river.		
			Mitigation Measure PSR-4d:		
			Modify Policy LU 5.1.2: Vision for the River District.		
			Engage the community, and stakeholders, and federal, state, and regional land management agencies in establishing a vision for Folsom's River District.		
			Mitigation Measure PSR-4e:		
			Modify Policy LU 5.1.3: River District Master Plan.		
			Prepare a River District Master Plan for Folsom's riverfront area, that is based on widespread community engagement as well as coordination with the <u>U.S. Bureau of Reclamation</u> , California Department of Parks and Recreation, and <u>Sacramento County Regional Parks Department</u> .		

Table 2-1 Summary of Impacts and Mi	tigatio	on Mea	sures		
Environmental Impact	Level of Significance Before Mitigation		Mitigation Measure/Alternative		rel of ficance fter gation
	LS	S		LS	SU
			Mitigation Measure PSR-4f:		
			Modify Policy LU 5.1.4: Enhance Lake Natoma with Compatible Recreation Uses.		
			Enhance the role of Lake Natoma as a place to recreate and an amenity for Folsom residents, and elevate Lake Natoma's role in supporting local and regional business and commerce, including tourism, recreation, and leisure, while maintaining compatibility with the Folsom Lake State Recreation Area General Plan. Invest in strategically-located sites along the length of Lake Natoma for a diverse mix of passive and active recreation and tourism activities that are compatible with nearby land uses, historically and culturally important sites, significant habitat areas, restoration sites, and native fish and wildlife usage.		
			Mitigation Measure PSR-4g:		
			Modify Policy PR 4.1.1: Coordination with State and County Federal Parks.		
			Coordinate with State and County park officials to provide education in programs that inform the community on topics such as local natural resources, conservation efforts, and fire safety.		
			Mitigation Measure PSR-4h:		
			Modify Policy PR 4.1.3: County, and State, and Federal Cooperation.		
			Cooperate with the County Department of Regional Parks, State Department of Parks and Recreation, State Department of Corrections and Rehabilitation, and State Department of Fish and Wildlife, and U.S. Bureau of Reclamation on facility development and program offerings as appropriate.		
			Mitigation Measure PSR-4i:		
			Modify Policy PR 4.1.5: Waterway Recreation and Access.		
			Coordinate with <u>appropriate</u> Federal <del>agencies</del> , <u>and</u> State agencies, Sacramento County Regional Parks, private landowners, and developers to manage, preserve, and enhance the American River Parkway, urban waterways, and riparian corridors, <u>including</u> to increase public access for active and passive recreation.		

Environmental Impact	Level of Significance Before Mitigation		Mitigation Measure/Alternative		vel of ficance fter gation
	LS	S		LS	SU
			Mitigation Measure PSR-4j:		
			Modify the 2035 General Plan Land Use Diagram – Transit Priority Areas.		
			Modify the 2035 General Plan Land Use Diagram to delete any indication that proposed Transit Priority Areas would include public lands within the Folsom Lake State Recreation Area and American River Parkway.		
			Mitigation Measure PSR-4k:		
			Modify the 2035 General Plan Land Use Diagram – River District.		
			Modify the 2035 General Plan Land Use Diagram to delete any indication that the proposed River District would include public lands within the Folsom Lake State Recreation Area and American River Parkway. This is not intended to preclude the addition of such lands to the River District upon completion of the River District Master Plan prepared in compliance with Policy LU 5.1.3.		
			Mitigation Measure PSR-41:		
			Modify the 2035 General Plan Land Use Diagram - Planning Area 1.		
			Modify the 2035 General Plan Land Use Diagram to amend the boundary of Planning Area 1 to exclude the Alder Creek/Pond area within the FLSRA.		
			Mitigation Measure PSR-4m:		
			Modify the 2035 General Plan Land Use Diagram – Planning Area 2.		
			Modify the 2035 General Plan Land Use Diagram to amend the boundary of Planning Area 2 to exclude the Prairie City SVRA.		
Transportation and Circulation					
Impact T-1: Traffic level of service on local intersections.		S	Mitigation Measure T-1: Implement all feasible improvements identified in Table 17-20 at impacted intersections.		SU
			Mitigation Measure T-2:		
			Implement Mitigation Measures GHG-10, GHG-12, and GHG-13.		
Impact T-2: Traffic level of service on US Highway		S	Mitigation Measure T-3:		SU
50.			Implement the new interchanges and improvements along US Highway 50.		

Table 2-1 Summary of Impacts and Mi	tigatio	n Mea	asures		
Environmental Impact	Leve Signifi Befo Mitig	cance ore	Mitigation Measure/Alternative	Signi A	vel of ficance fter gation
	LS	S		LS	SU
			<ol> <li>The two new interchanges on US Highway 50 at Oak Avenue Parkway and at Empire Ranch Road interchanges would cause a significant shift in traffic volumes from East Bidwell Street interchange the new interchanges. Both interchanges were assumed to have a high capacity partial cloverleaf (L9) design with a one or two lane single slip off-ramp, a loop ramp and a slip on-ramp in each direction.</li> <li>New "auxiliary lanes" are assumed to be added both eastbound and westbound on US Highway 50 between each interchange from Folsom Boulevard to El Dorado Hills Boulevard, which is consistent with the "Traffic Operations Analysis Report for the U.S. 50 Auxiliary Lane Project" (DKS 2007). These auxiliary lanes were assumed to begin at the loop on-ramp at each of the existing and new partial cloverleaf interchanges and extend to the off-ramp at the downstream interchange.</li> <li>A "transitional lane" was assumed to be added in the eastbound direction from the Hazel Avenue eastbound on-ramp to the off-ramp to Prairie City Road to mitigate the current bottleneck caused by the lane drop at Folsom Boulevard.</li> <li>Two lane off-ramps were assumed to be added at any location where volumes warrant the additional lane.</li> <li>A standard intersection design would result in an unacceptable weaving condition on eastbound US Highway 50 between the Prairie City Road on ramps and the new off ramp with Oak Avenue Parkway. Therefore, it was assumed that a "braided ramp" design would be used. It was assumed that this design would involve merging the two eastbound on-ramps from Prairie City Road and then grade separating that combined on-ramp with the new off-ramp to Oak Avenue Parkway.</li> <li>It was assumed that a White Rock Road would be widened to four lanes, which would help divert some traffic from US Highway 50.</li> </ol>		
Tribal Cultural Resources					·
<b>Impact TCR-1:</b> Interference with tribal cultural resources.		S	Mitigation Measure TCR-1: None available.		SU

Environmental Impact		el of icance fore gation	Mitigation Measure/Alternative		vel of ficance fter gation
	LS	S		LS	SU
Utilities and Service Systems					
Impact USS-1: Exceed Wastewater Treatment Requirements of the Central Valley Regional Water Quality Control Board.	LS		Mitigation Measure USS-1: None required.	LS	
Impact USS-2: Require the construction of new or expanded stormwater drainage facilities, the construction of which could cause significant environmental effects.	LS		Mitigation Measure USS-2: None required.	LS	
Impact USS-3: Increase the generation of wastewater, requiring new or expanded wastewater collection or conveyance facilities.	LS		Mitigation Measure USS-3: None required.	LS	
Impact USS-4: Have sufficient water supplies available to serve development identified by the 2035 General Plan from existing water entitlements and resources.	LS		Mitigation Measure USS-4: None required.	LS	
Impact USS-5: Increase the generation of solid waste, resulting in a demand for additional landfill capacity.	LS		Mitigation Measure USS-5: None required.	LS	
<b>Impact USS-6</b> : Increased demand for private utility services.	LS		Mitigation Measure USS-6: None required.	LS	
Cumulative Impacts	•	•			,
Aesthetics and Visual Resources		S	None available beyond implementation of proposed 2035 General Plan policies and mitigation measures identified in this DPEIR.		SU
Agriculture and Forestry Resources		S	None available		SU
Air Resources		S	None available beyond implementation of proposed 2035 General Plan policies and mitigation measures identified in this DPEIR.		SU
Biological Resources		S	None available beyond implementation of proposed 2035 General Plan policies and mitigation measures identified in this DPEIR.		SU

Table 2-1 Summary of Impacts an	d Mitigatio	n Mea	asures		
Environmental Impact	Level of Significance Before Mitigation		Mitigation Measure/Alternative	Level of Significand After Mitigation	
	LS	S		LS	SU
Cultural Resources		S	None available beyond implementation of proposed 2035 General Plan policies.		SU
Geology, Soils, and Mineral Resources		S	None available beyond implementation of proposed 2035 General Plan policies.		SU
Global Climate Change		S	None available beyond implementation of proposed 2035 General Plan policies and mitigation measures identified in this DPEIR.		SU
Hazards and Hazardous Materials	LS		None required.	LS	
Hydrology and Water Quality	LS		None required.	LS	
Noise and Vibration		S	None available beyond implementation of proposed 2035 General Plan policies and mitigation measures identified in this DPEIR.		SU
Public Services and Recreation Resources	LS		None required.	LS	
Transportation and Circulation		S	None available beyond implementation of proposed 2035 General Plan policies and mitigation measures identified in this DPEIR.		SU
Tribal Cultural Resources		S	None available beyond implementation of proposed 2035 General Plan policies and mitigation measures identified in this DPEIR.		SU
Utilities and Service Systems	LS		None required.	LS	
CEQA Required Topics					
Growth Inducement	LS		None required.	LS	
Energy		S	Mitigation Measure ENR-1:	LS	
			Implement Mitigation Measures GHG-1 through GHG-17.		
Irreversible Commitment of Resources	LS		None required.	LS	
Irreversible Environmental Changes		S	None available beyond implementation of proposed 2035 General Plan policies and mitigation measures identified in this DPEIR.		SU
Damage from Accidents	LS		None required.	LS	

Source: Planning Partners 2018.

The significance criteria for each environmental issue were evaluated as required by CEQA. The criteria determined to result in no impact or a less-than-significant impact were not examined further, and are listed below.

Ta	ble 2-2 Potential Impacts Determined to be Less-than-significant of	or No Impa	act
	Potential Impact	Less-than- Significant Impact	No Impact
Ag	riculture and Forestry Resources		
a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	X	
b)	Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	X	
c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?		X
d)	Result in the loss of forest land or conversion of forest land to non-forest use?		X
Bio	ological Resources		
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	X	
f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	X	
Ge	ological Resources		
a)	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water? (VI.e)	X	
Ha	zards and Hazardous Materials		
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?		X
f)	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?		X
Ну	drology and Water Quality		
b)	Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	X	
j)	Inundation by seiche, tsunami, or mudflow?	X	
No	ise and Vibration		
b)	Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.	X	
f)	For a project within the vicinity of a private airstrip, exposure of people residing or working in the project area to excessive noise levels.		X

Ta	able 2-2 Potential Impacts Determined to be Less-than-significant of	or No Impa	act
	Potential Impact	Less-than- Significant Impact	No Impact
Tra	affic and Circulation		
a)	Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks? (XVI.i)	X	
b)	Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? (XVI.d)	X	
c)	Result in inadequate emergency access? (XVI.e)	X	
d)	Eliminate or adversely affect an existing bikeway, pedestrian facility, or transit facility in a way that would discourage its use (Corresponds to XVI.a and XVI.f)	X	
e)	Interfere with the implementation of a planned bikeway or planned pedestrian facility, or be in conflict with a future transit facility ( <i>Corresponds to XVI.a and XVI.f</i> )	X	
f)	Result in unsafe conditions for bicyclists or pedestrians including conflicts with other modes (Corresponds to XVI.a and XVI.f)	X	
g)	Result in demands to transit facilities greater than available capacity (Corresponds to XVI.a and XVI.f)	X	

Source: Planning Partners 2018.

## 3 PUBLIC COMMENT AND RESPONSE TO COMMENTS

#### 3.1 Public Comments and Responses

The California Environmental Quality Act (CEQA) requires public disclosure in an Environmental Impact Report (EIR) of all project environmental effects and encourages public participation throughout the EIR process. As stated in CEQA Guidelines Section 15200, the purposes of public review of environmental documents are:

- sharing expertise;
- disclosing agency analyses;
- · checking for accuracy;
- · detecting omissions;
- discovering public concerns; and,
- soliciting counter-proposals.

CEQA Guidelines Section 15201 states that "(p)ublic participation is an essential part of the CEQA process." A public review circulation period of no less than 30 days nor longer than 60 days is required for a Draft EIR (DEIR) under CEQA Guidelines Section 15105(a). If a State agency is a lead or responsible agency for the project, the public review period shall be at least 45 days. In the case of the EIR prepared for the 2035 General Plan, a 45-day review period extending from March 7, 2018 to April 20, 2018 was established.

During circulation of the Draft Program EIR (DPEIR) for the City of Folsom 2035 General Plan (2035 General Plan), the City of Folsom received nine comments on the DPEIR and/or the draft 2035 General Plan. Each letter and each comment within a letter have been given an identification number. Responses are numbered so that they correspond to the associated comment. Where appropriate, responses are cross-referenced between letters. All comments received within the review period and responses to comments are set forth in the following pages.

All comment letters are reproduced in their entirety, followed by written responses. Where a commenter has provided multiple comments, each comment is indicated by brackets and an identifying number notation in the margin of the comment letter.

Specific responses are intended to address the topic(s) raised by a particular comment. Responses are numbered to correspond to specific comments in each comment letter. To assist the reader, a paraphrased summary of the key comment issue is provided at the beginning of each response. In some instances, the responses to comments may warrant modification of the text of the DPEIR. In those cases, information that is to be deleted is shown in strikethrough (strikethrough) and additions are shown in underline (underline). Text changes resulting from comments and their accompanying responses have been incorporated into the original DPEIR text, as indicated in the responses.

All text changes made in response to public comments result in minor modifications to the original Draft EIR text, as explained in the introductory text and demonstrated in the body of Chapter 4, *Corrections and Revisions to the Draft EIR*, of this Final PEIR. None of the changes included in this Final EIR resulted in new significant environmental effects or a substantial increase in the severity of any

previously identified significant effects; thus, the changes do not warrant recirculation of all or part of the DPEIR for additional public review.

Section 15088(c) of the State CEQA Guidelines specifies that the focus of the responses to comments shall be on the disposition of significant environmental issues. Responses are not required on comments regarding the merits of the proposed 2035 General Plan or on issues not related to environmental impacts. For every written comment regarding the DPEIR received from the public, agencies, and organizations, the City of Folsom has provided a written response.

Comments on the merits of the proposed 2035 General Plan or other comments that do not raise environmental issues are noted in the responses, and will be reviewed by the City Council before it takes any action on whether to approve the proposed 2035 General Plan update. When a comment does not directly pertain to the environmental issues analyzed in the DPEIR, does not ask a question about the adequacy of the analysis contained in the DPEIR, or does not challenge an element of or conclusion of the Draf DPEIR, the response will note the comment and provide additional information where possible. The staff report prepared as part of the hearing process will address non-environmental comments and the policies that could be affected. No other response to such a comment is provided. This is not to diminish the importance of such comments, but rather to ensure that the substance of the comment is debated and considered by the decision-makers of the City of Folsom and not the authors of the EIR.

#### **COMMENTER**

#### **COMMENT IDENTIFICATION**

## Federal Agency

None received

#### State Agency

April 13, 2018	Α
Regional Agency	
Sacramento Area Council of Governments (SACOG); April 10, 2018 Sacramento Metropolitan Air Quality Management District (SMAQMD); April 20. 2018	B C
Public Utility and Service Provider	
Sacramento Municipal Utility District (SMUD); April 17, 2018	D
Local Agency	
Mallory, Kevin; City of Folsom Planning Commissioner; March 22, 2018	Е
Citizen / Non-governmental Organizations	
Hettinger, Loretta; April 20, 2018	F
Laurent, Laurette; April 13, 2018	G
Leary, Barbara; April 20, 2018	Н
Kempenaar, Casey; April 16, 2018	I

#### Letter A





#### **Central Valley Regional Water Quality Control Board**

13 April 2018

Scott Johnson City of Folsom 50 Natoma Street Folsom, CA 95630

**CERTIFIED MAIL** 91 7199 9991 7036 6990 3544

## COMMENTS TO REQUEST FOR REVIEW FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT, CITY OF FOLSOM 2035 GENERAL PLAN UPDATE PROJECT, SCH# 2017082054, SACRAMENTO COUNTY

Pursuant to the State Clearinghouse's 7 March 2018 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the Request for Review for the Draft Environment Impact Report for the City of Folsom 2035 General Plan Update Project, located in Sacramento County.

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

#### 1. **Regulatory Setting**

#### **Basin Plan**

A-2

A-1

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

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

KARL E. LONGLEY ScD, P.E., CHAIR | PAMELA C. CREEDON P.E., BCEE, EXECUTIVE OFFICER

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City of Folsom 2035 General Plan Update Project Sacramento County - 2 -

13 April 2018

A-2

the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues.

For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website: http://www.waterboards.ca.gov/centralvalley/water\_issues/basin\_plans/.

#### **Antidegradation Considerations**

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Policy is available on page IV-15.01 at: http://www.waterboards.ca.gov/centralvalleywater\_issues/basin\_plans/sacsjr.pdf

#### In part it states:

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

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

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

#### II. Permitting Requirements

#### **Construction Storm Water General Permit**

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction Activities (Construction General Permit), Construction General Permit Order No. 2009-009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan

- 3 -

13 April 2018

(SWPPP).

A-2

For more information on the Construction General Permit, visit the State Water Resources Control Board website at:

http://www.waterboards.ca.gov/water\_issues/programs/stormwater/constpermits.shtml.

## Phase I and II Municipal Separate Storm Sewer System (MS4) Permits<sup>1</sup>

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

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/water\_issues/storm\_water/municipal\_permits/.

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at:

http://www.waterboards.ca.gov/water\_issues/programs/stormwater/phase\_ii\_municipal.sht ml

#### **Industrial Storm Water General Permit**

Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 2014-0057-DWQ.

For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/water\_issues/storm\_water/industrial\_general\_permits/index.shtml.

## **Clean Water Act Section 404 Permit**

A-3

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACOE). If a Section 404 permit is required by the USACOE, the Central Valley Water Board will review the permit application to ensure

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

-4-

13 April 2018

A-3

that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements.

If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACOE at (916) 557-5250.

## Clean Water Act Section 401 Permit – Water Quality Certification

If an USACOE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications.

# Waste Discharge Requirements - Discharges to Waters of the State

If USACOE determines that only non-jurisdictional waters of the State (i.e., "non-federal" waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation.

For more information on the Water Quality Certification and WDR processes, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/help/business help/permit2.shtml.

**Dewatering Permit** 

A-4

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Risk General Order) 2003-0003 or the Central Valley Water Board's Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Risk Waiver)

R5-2013-0145. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

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

http://www.waterboards.ca.gov/board\_decisions/adopted\_orders/water\_quality/2003/wqo/w qo2003-0003.pdf

- 5 -

13 April 2018

For more information regarding the Low Risk Waiver and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/board\_decisions/adopted\_orders/waivers/r5-2013-0145 res.pdf

A-5

# Regulatory Compliance for Commercially Irrigated Agriculture

If the property will be used for commercial irrigated agricultural, the discharger will be required to obtain regulatory coverage under the Irrigated Lands Regulatory Program. There are two options to comply:

- 1. Obtain Coverage Under a Coalition Group. Join the local Coalition Group that supports land owners with the implementation of the Irrigated Lands Regulatory Program. The Coalition Group conducts water quality monitoring and reporting to the Central Valley Water Board on behalf of its growers. The Coalition Groups charge an annual membership fee, which varies by Coalition Group. To find the Coalition Group in your area, visit the Central Valley Water Board's website at: http://www.waterboards.ca.gov/centralvalley/water\_issues/irrigated\_lands/for\_growers/apply\_coalition\_group/index.shtml or contact water board staff at (916) 464-4611 or via email at IrrLands@waterboards.ca.gov.
- 2. Obtain Coverage Under the General Waste Discharge Requirements for Individual Growers, General Order R5-2013-0100. Dischargers not participating in a third-party group (Coalition) are regulated individually. Depending on the specific site conditions, growers may be required to monitor runoff from their property, install monitoring wells, and submit a notice of intent, farm plan, and other action plans regarding their actions to comply with their General Order. Yearly costs would include State administrative fees (for example, annual fees for farm sizes from 10-100 acres are currently \$1,084 + \$6.70/Acre); the cost to prepare annual monitoring reports; and water quality monitoring costs. To enroll as an Individual Discharger under the Irrigated Lands Regulatory Program, call the Central Valley Water Board phone line at (916) 464-4611 or e-mail board staff at IrrLands@waterboards.ca.gov.

# **Low or Limited Threat General NPDES Permit**

**A-6** 

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Dewatering and Other Low Threat Discharges to Surface Waters* (Low Threat General Order) or the General Order for *Limited Threat Discharges of Treated/Untreated Groundwater from Cleanup Sites, Wastewater from Superchlorination Projects, and Other Limited Threat Wastewaters to Surface Water* 

-6-

13 April 2018

A-6

(Limited Threat General Order). A complete application must be submitted to the Central Valley Water Board to obtain coverage under these General NPDES permits.

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

http://www.waterboards.ca.gov/centralvalley/board\_decisions/adopted\_orders/general\_orders/r5-2013-0074.pdf

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

http://www.waterboards.ca.gov/centralvalley/board\_decisions/adopted\_orders/general\_orders/r5-2013-0073.pdf

## **NPDES Permit**

If the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit.

For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/help/business\_help/permit3.shtml

If you have questions regarding these comments, please contact me at (916) 464-4644 or Stephanie. Tadlock@waterboards.ca.gov.

Stephanie Tadlock

**Environmental Scientist** 

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

# Response to Letter A

Commenter California Water Boards, Central Valley Regional Water Quality Control Board

(CVRWQB) April 13, 2018

A-1 This is an introductory statement that establishes the authority of the CVRWQB to regulate water resources and quality in the City of Folsom and elsewhere throughout the Central Valley.

No response is necessary.

A-2 The comment discusses various regulations underlying CVRWQB regulation of surface- and groundwaters, and sets forth CVRWQB permitting requirements, including those regulating discharges of water from construction sites, municipal stormwater facilities, and industries.

The comment does not raise issues related to the adequacy of the Draft PEIR. See the regulatory setting an Chapter 14 (*Hydrology and Water Quality*) and Appendix C (*Regulatory Setting*) of the DPEIR for a discussion of federal, State, regional, and local rules and regulations addressing water quality. Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

A-3 The comment sets forth CVRWQB permitting requirements, including those regulating wetlands, rivers, streams, and riparian areas classified as waters of the United States and/or waters of the State.

The comment does not raise issues related to the adequacy of the Draft PEIR. See the regulatory setting in Chapter 9 (*Biological Resources*) and Appendix C (*Regulatory Setting*) of the DPEIR for a discussion of federal, State, regional, and local rules and regulations addressing wetlands and other sensitive water features. Impacts BIO-2 and BIO-3 in PEIR Chapter 9 evaluate the potential effects of implementing the 2035 General Plan on riparian and other sensitive habitats and waters of the United States. Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

A-4 The comment discusses CVRWQB permitting requirements, including those regulating discharges of water from construction dewatering.

The comment does not raise issues related to the adequacy of the Draft PEIR. See the regulatory setting an Chapter 14 (*Hydrology and Water Quality*) and Appendix C (*Regulatory Setting*) of the DPEIR for a discussion of federal, State, regional, and local rules and regulations addressing water quality. Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

A-5 The comment discusses CVRWQB permitting requirements, including those regulating discharges of water from lands irrigated for agriculture.

The comment does not raise issues related to the adequacy of the Draft PEIR. No irrigated agricultural lands regulated by the CVRWB are located within the City of Folsom. See Chapter 7 (*Agricultural and Forestry Resources*) of the Draft PEIR. Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

A-6 The comment discusses CVRWQB permitting requirements, including those regulating discharges of water from construction dewatering or of wastewater.

The comment does not raise issues related to the adequacy of the Draft PEIR. See the regulatory setting in Chapter 14 (*Hydrology and Water Quality*) and Appendix C (*Regulatory Setting*) of the DPEIR for a discussion of federal, State, regional, and local rules and regulations addressing water quality. The City does not operate a wastewater treatment plant or regional collection facilities. Rather, the City only operates collection facilities within the boundaries of the City. Collected wastewater is discharged into regional transmission facilities for collection and treatment at the Sacramento Wastewater Treatment Plant. For a discussion and evaluation of wastewater facilities, please refer to Chapter 19 (*Utilities and Service Systems*) of the DPEIR. Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

#### Letter B

Sacramento Area Council of Governments 1415 L Street, Suite 300 Sacramento, CA 95814

tel: 916.321.9000 fax: 916.321.9551 tdd: 916.321.9550 www.sacog.org



April 10, 2018

Scott A. Johnson, AICP City of Folsom, Department of Community Development 50 Natoma Street, Folsom, CA 95630

Re: Comments on February 2018 Public Review Draft of the Folsom General Plan

Dear Mr. Johnson:

SACOG received notification of the February 2018 Public Review Draft of the Folsom 2035 General Plan (Draft General Plan) and would like to offer the following comments. From the materials we have reviewed, it is clear that the City process is examining a full range of opportunities and issues that will be important to the future quality of life for Folsom citizens and the entire region. We appreciate the city including SACOG in this regionally important planning process.

B-1

The basis for our comments is the Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) and Blueprint. SACOG's primary responsibility is developing and implementing the MTP/SCS, a document that establishes transportation spending priorities throughout the region. The MTP/SCS must be based on the most likely land use pattern to be built over the 20+ year planning period, and it must conform with federal and state air quality regulations. The foundation for the MTP/SCS land use forecast is local government general plans, community plans, specific plans, and other local policies and regulations. Other market and regulatory/policy variables that are considered help refine the sum of the local plans in order to determine the most likely future development pattern for a specific period of time. The Blueprint vision is based or the principles of smart growth and is intended to give general direction on how the region should develop to reap the benefits of the Blueprint Preferred Scenario (and related MTP/SCS). Implementation of the Blueprint vision depends greatly on the efforts of cities and counties to implement that vision through local plans and projects. The MTP/SCS and Blueprint are in alignment with each other because of these local efforts. Because the Blueprint Principles underpin all our regional planning work, we reviewed and evaluated the Draft General Plan as it relates to the Blueprint Principles.

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Sacramento County

Sutter County

West Sacramento

Wheatland
Winters
Woodland
Yolo County
Yuba City

Yuba County

The Blueprint Principle of <u>Transportation Choice</u> means that people have viable options for traveling beyond driving in a car. There is a strong connection between land use patterns, travel behavior, and air quality. Higher densities, mixed uses, locating housing near jobs, and providing strong bicycle and pedestrian connectivity all lead to shorter auto trips and increased walking, biking, and transit use.

B-2

We are encouraged to see goals and policies throughout the Draft General Plan that support this. The Mobility chapter includes a number of strong policies that support all modes of travel and all travelers. Goal M 1.1 and Policy M 1.1.1 are particularly good examples of providing connected transportation services for all modes to serve the needs of all users. Policy NCR 3.1.3 from the Natural and Cultural Resources chapter specifically encourages a reduction in vehicle miles traveled through mixed-use, jobs/housing balance, and encouraging low-carbon transportation choices. The Land Use chapter also has a number of goals and policies directly related to transportation choice, including a new section on Transit-Oriented Development that has an overarching goal of "establishing transit-supported mixed-use districts near rapid transit

Mr. Scott Johnson April 10, 2018 Page 2

that support the needs of commuters, residents, employees, business owners, and patrons" (Goal LU 4.1). This section includes all new policies in support of this goal. We commend the City for being a leader in setting policies that will help to maximize the use of this important public investment. We recognize that each of the three station areas in the City differ in character and have a unique set of opportunities and challenges. We appreciate that the seven policies in this section are useful to all of them. We strongly support all seven policies in this section and wanted to highlight Policy LU 4.13 which aims to maximize TOD-related CEQA streamlining benefits and Policy LU 4.14 which restricts auto-oriented uses within one-quarter miles of light rail stations. These are excellent examples of strong TOD-supportive policies that support implementation actions.

В-3

B-2

Housing Choice and Diversity, another Blueprint Principle, is about providing a range of housing choices to serve the needs of all the residents. The Blueprint assumes approximately two-thirds of the new housing growth in the City (from 2005) would be in small-lot single-family or attached homes. This was a big change from the existing housing stock, which was made up of 74 percent of large-lot single-family homes in 2002 at the onset of Blueprint. Today, our estimate is that the City is made up of roughly 60 percent large-lot single-family homes, illustrating that the City has made significant progress towards providing more housing diversity. Blueprint defines large-lot single-family homes as detached homes on lots 5,500 square feet or larger, which translates to 8 units per acre or less. We are happy to see the City supporting an overall increase in average residential densities in identified urban centers and mixed-use districts in the General Plan (Policy LU 6.1.3) as we believe the demand for a variety of housing, as illustrated in the Blueprint, still exists today.

While the City is making strides to plan for more housing choice, based on the Holding Capacity Methodology (Appendix D of the PEIR), roughly half of the new housing units are still large-lot single-family. To allow for more flexibility in the City's ability to provide more housing choice, we suggest that you consider increasing the maximum density of the Single Family High Density land use from 7 units per acre to 12 units per acre.

**B-4** 

Compact Development and Using Existing Assets are two Blueprint Principles that directly support transportation choice by maximizing infill development. Policies like LU 1.1.11, LU 1.1.12, and 1.1.6 that evaluate vacant and underutilized sites, encourage infill development on key parcels, and encourage compact development patterns that support more transportation choices and a more efficient use of the land are in direct support of these Blueprint Principles.

D-4

We also appreciate your response to our NOP comment letter confirming that, outside of the relocation of the Corporation Yard, that the City is not currently considering development south of White Rock Road in Planning Area 2 by 2035 in this Draft General Plan. A portion of Planning Area 2 is shown on the Blueprint map as Vacant Urban Lands, meaning that the Blueprint recognized this area a potential development area post 2050. Looking at recent development trends and our updated regional growth projections, our recent research suggests that the Blueprint development assumed by 2050 is likely going to take much longer to achieve. Given the very large supply of housing entitlements in the rest of the region, we do not foresee a need to consider development in this area for a very long time. We are supportive of the City not considering this area for development in this plan update.

The Blueprint Principle of <u>Mixed Use</u> asserts that well planned mixed use developments include elements of all Blueprint Principles. Building homes, shops, entertainment, office, and other uses near each other can create active neighborhoods that can function as local activity centers and encourage non-automobile travel. Mixed use can occur at many scales and can be vertical, horizontal, or both. Goals LU 2.1 and 3.1 support thriving urban centers that serve as community gathering places and encourage mixed-use development projects that create vibrant walkable districts.

B-5

It is unclear if the Draft General Plan will supersede the Folsom Plan Area Specific Plan for the area south of Highway 50. We recommend being more explicit in the General Plan about how these two plans will interact. The Draft General Plan assumes some mixed use development in the commercial areas in the South of 50 Area; however, it is not explicit in the policies or the description of the land uses that mixed use

| B-6

Mr. Scott Johnson April 10, 2018 Page 3

is allowed. We encourage you to include policies and/or land use designation descriptions that better communicates the capacity of these sites to be developed as mixed use.

**B-6** 

<u>Natural Resources Conservation</u>, another important Blueprint Principle, promotes natural resource preservation and encourages the incorporation of public-use open space into development projects and urban areas. The Draft General Plan's Land Use, Natural and Cultural Resources, and Parks and Recreation elements have many goals and policies that support this Blueprint Principle, including LU 1.1.10 that ensures a connected network of open space.

**B-7** 

<u>Design for Quality</u> is the Blueprint Principle that relates not only to the attractiveness of buildings, but also to street pattern and urban design of a development. A walkable street pattern is one of the most significant factors in reducing vehicle miles traveled for an area. A pedestrian-friendly street pattern and urban design encourages not only walking, but also biking and transit use. The Draft General Plan includes a lot of attention to the design of streets, neighborhoods, and land uses in general, which is supportive of this principle. In particular, Policy LU 9.13 encourages the insertion of new streets or pedestrian ways into large "super blocks" that are common in existing retail corridors.

In summary, the Draft General Plan demonstrates good local planning and is in alignment with the Blueprint and MTP/SCS. We thank you for your continued commitment to the Blueprint implementation. SACOG has begun work on its update of the MTP/SCS. With limited transportation funds available, constrained growth projections, and a higher greenhouse gas reduction target, we are very encouraged to see the City has many shared goals with the region. Additionally, we are encouraged to see a Transportation Funding section in the Draft General Plan with a new goal and new policies related to funding construction, maintenance, and operations of the transportation facilities and services needed to achieve the City's mobility goals.

**B-8** 

Thank you for the opportunity to comment and for continuing to engage with us on this important process. If you have additional questions, please feel free to contact me or Kacey Lizon, Planning Manager, at klizon@sacog.org or 916-340-6265.

Sincerely,

<del>Ja</del>mes Corless

Chief Executive Officer

# Response to Letter B

Commenter Sacramento Area Council of Governments (SACOG)
April 10, 2018

B-1 This introductory comment states that SACOG is evaluating the proposed 2035 General Plan with the planning principles adopted by SACOG in the Metropolitan Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and the Sacramento Region Blueprint.

No response is necessary.

B-2 The comment states that the proposed 2035 General Plan policies are consistent with the Blueprint principle of Transportation Choice.

The comment raises a policy consistency issue and does not identify any issues related to the adequacy of the Draft PEIR. No further response is necessary under CEQA. This comment will be provided to the decision makers for consideration. Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

B-3 The comment provides a comparison of the 2035 General Plan with the Blueprint principle of Housing Choice and Diversity. The comment notes that much of the housing proposed by the 2035 General Plan as set forth in Appendix D of the DEIR consists of large-lot single-family development. The comment recommends that the City consider increasing the maximum density of the Single Family High Density land use designation of the 2035 General Plan.

The comment raises policy issues and does not identify any issues related to the adequacy of the Draft PEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff's response to this comment will be included as an appendix to the staff report. Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

B-4 The comment states that the proposed 2035 General Plan policies are consistent with the Blueprint principle of Compact Development and Using Existing Assets. The comment indicates approval of 2035 General Plan policies that support maximizing infill development. The comment notes that the DPEIR responds appropriately to SACOG's comment on the City's Notice of Preparation regarding the potential for growth inducement with the inclusion of an area south of White Rock Road within the General Plan planning area. The comment states that SACOG agrees with the DPEIR's characterization of this area with respect to future urban development post-2050.

Regarding the comment supporting maximizing infill development, the comment raises a policy consistency issue and does not identify any issues related to the adequacy of the Draft PEIR. No further response is necessary under CEQA. This comment will be provided to the decision makers for consideration. Because the comment does not raise any concerns

regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

With respect to the General Plan planning area south of White Rock Road, the comment does not raise issues related to the adequacy of the Draft PEIR. See the discussion of Planning Area 2 and the potential for growth inducement in Chapters 4 (*Land Use, Population, and Housing*), 5 (*Introduction to the Environmental Analysis*), and 20 (*Alternatives Analysis*) of the DPEIR, which determined that the potential for growth inducement in the area south of White Rock Road was less than significant. Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

B-5 The comment states that 2035 General Plan policies are consistent with the Blueprint principle of Mixed Use.

The comment raises a policy consistency issue and does not identify any issues related to the adequacy of the Draft PEIR. No further response is necessary under CEQA. This comment will be provided to the decision makers for consideration. Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

B-6 The comment requests additional discussion of the relationship between the Folsom Plan Area Specific Plan and the 2035 General Plan, and apparent inconsistencies between the Specific Plan and the General Plan.

The comment raises policy issues and does not identify any issues related to the adequacy of the Draft PEIR. No further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff's response to this comment will be included as an appendix to the staff report. Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

B-7 The comment states that the proposed 2035 General Plan policies are consistent with the Blueprint principles of Natural Resources Conservation and Design for Quality.

The comment raises policy consistency issues and does not identify any issues related to the adequacy of the Draft PEIR. No further response is necessary under CEQA. This comment will be provided to the decision makers for consideration. Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

B-8 The comment concludes the letter by stating that the proposed 2035 General Plan is in alignment with the policies of the Blueprint and the MTP/SCS.

The comment raises a policy consistency issue and does not identify any issues related to the adequacy of the Draft PEIR. No further response is necessary under CEQA. This comment will be provided to the decision makers for consideration. Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

#### Letter C

SACRAMENTO METROPOLITAN



April 20, 2018

#### SENT VIA E-MAIL ONLY

Mr. Scott Johnson City of Folsom Community Development Department 50 Natoma Street Folsom, CA 95630

#### Folsom 2035 General Plan and Draft Environmental Impact Report (AQMD# SAC200801305)

Dear Mr. Johnson:

Thank you for providing the opportunity for the Sacramento Metropolitan Air Quality Management District (SMAQMD) to review and comment on the Folsom 2035 General Plan and Draft Environmental Impact Report (DEIR). Overall, the City of Folsom has prepared a comprehensive General Plan that contains policies in the areas of sustainable transportation modes, mixes of land uses and densities, energy efficiency buildings and conservation efforts that support air quality and climate change improvements. SMAQMD is required to represent the citizens of Sacramento in influencing the decisions of other agencies whose actions may have an adverse impact on air quality<sup>1</sup>. In that spirit, SMAQMD staff is providing comments to clarify and strengthen the City's General Plan and DEIR.

## **Policy Document Comments**

- SMAQMD recommends including the Living Building Challenge as another example of sustainable building standards in addition to LEED in Policy LU 1.1.13 Sustainable Building Practices (page LU-15).
- 2. To support the climate adaptation requirements of Government Code Section 65302 (g) and SB 379, Policy LU 1.1.14 Promote Resiliency and Goal NCR 3.2 Improve Sustainability should cross reference other policies that include adaptation efforts and identify more specific measurable policies as part of its resiliency section. Some examples of other existing policies include Policy SN 1.1.4 Multi-Hazard Mitigation Plan, Policy SN 4.1.3 Community Wildfire Preparedness Plan, and Goal SN 3.1 Minimize the Risk of Flooding Hazards (pages LU-15, NCR-7, SN-3, SN-5 and SN-6). Attached are some specific recommendations for including resiliency in the General Plan.
- 3. SMAQMD commends the inclusion of **Goal LU 4.1 Establish Transit-Supported Mixed-Use Districts Near Rapid Transit Stations** and its supporting policies, particularly **Policy LU 4.1.4 Restricting Auto-Oriented Uses within ¼ Mile of a Light Rail Station**. SMAQMD encourages the City to include more examples of auto-oriented uses to this policy such as mini storage facilities and drive through restaurants, or establish a list of auto-oriented land uses in City Code to support this policy (pages LU-22 and LU-24).

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2035 General Plan Update Final EIR 3-16

C-1

C-2

**C-4** 

<sup>&</sup>lt;sup>1</sup> California Health and Safety Code §40961

Mr. Johnson Folsom 2035 General Plan April 20, 2018 Page 2

4. The City should consider expanding Policy LU 9.1.8 Cool Paving to include cool roof coverage on new commercial and re-roofing of existing commercial buildings and encourage cool roofs for residential buildings. Cool paving could include permeable pavements in appropriate places like sidewalks, parking lots, medians, parks, and residential streets. Permeable pavements reduce stormwater runoff and sequester rainfall.

C-6

C-5

5. Policy M 1.1.7 Transportation Systems Management, Policy M1.1.9 Transportation Demand Management, and Policy M 7.1.2 Fair Share for Transportation Infrastructure Improvements are critical to reduce single occupant vehicle trips and vehicle miles traveled in the City, thereby reducing emissions. These policies also support Policy NCR 3.1.3 Reduce Vehicle Miles Traveled. Implementation Programs M-1 Transportation Demand Management and PFS-15 Reduce VMT in City Operations should include the baseline and target years and defined reduction targets (pages M-8, NCR-6, M-19, IM-11 and IM-21).

C-7

6. SMAQMD commends the inclusion of policies promoting advanced vehicle technologies and fuels: M 1.1.10 Support Advanced Fueling Stations and Emerging Technologies, M 4.2.4 Electric Vehicle Charging Stations, and M 6.1.3, Support Zero- and Low-Emission Vehicle Adoption (pages M-8, M-16 and M-18). SMAQMD recommends the City promote electric vehicle charging infrastructure at multi-family residential units and provide minimum requirements for commercial developments in Policy M 6.1.3.

|C-8

7. Policy NCR 1.1.8 Planting in New Development provides the opportunity to require new tree plantings through Implementation Program NCR-1 Urban Forest Plan. SMAQMD encourages the City to create a new policy or expand NCR 1.1.8 to include tree planting in existing development. Tree planting should be expanded into Policy LU 7.1.5 Open Space as well. Also, the City should consider adopting a tree canopy goal in its Urban Forest Plan that new development projects and existing residents and businesses can support and strive to meet (pages LU-29, NCR-4 and IM-17). The Sacramento Tree Foundation may be a good source of information on tree canopy goals and also provides information on low-emitting tree species that SMAQMD promotes for local planting (http://www.sactree.com/assets/ShadyEightySTFweb.pdf).

IC-9

8. SMAQMD recommends the City modify the language in **Policy NCR 3.1.6 Sensitive Uses** to reference its ability to enact policies under its police powers for protecting the health and safety of the public (page NCR-7). SMAQMD offers detailed guidance for evaluating and reducing health impacts caused by exposure to mobile sources air toxics. The City may wish to establish project review criteria for sensitive uses near toxic air contaminants, with triggers for specific exposure reduction measures such as enhanced indoor air filtration, which can be made enforceable by a City ordinance. SMAQMD requires permits from certain stationary sources such as gasoline dispensing facilities, coffee bean roasting operations, and metal coating operations. The air quality permitting process for such facilities may require a health risk assessment and exposure reduction measures to reduce health impacts to sensitive receptors.

C-10

9. Please clarify that **Policy NCR 3.2.6 Coordination with SMAQMD** includes both construction and operational emissions. This policy also applies to **Goal NCR 3.1**, not exclusively **Goal NCR 3.2** (pages NCR-6, NCR-7 and NCR-8).

Mr. Johnson Folsom 2035 General Plan April 20, 2018 Page 3

10.	Policy NCR 3.2.3 Greenhouse Gas Reduction in New Development should include language encouraging energy-efficient, net-zero, and all-electric building design and site planning (page NCR-8).	C-11
	. <b>Policy PFS 8.1.7 Energy Conservation in City Operations</b> should include both baseline and target years for the 20% energy use reductions (page PFS-13).	  C-12
	. The City should consider setting a reduction target for <b>Policy PFS 8.1.8 City Fleet Fuel Efficiency</b> (page PFS-13).	C-13
13.	. SMAQMD recommends including a reference to AB 1826 in <b>Policy PFS 9.1.4 Composting</b> since AB 1826 requires diversion of organic waste from the landfill (page PFS-14).	C-14
DEIR C	omments	
1.	SMAQMD is providing an attachment with general recommendations on updating the background, scientific information and regulatory portions of the Global Climate Change chapter.	C-15
2.	SMAQMD recommends the City include cool roofs as a greenhouse gas emissions mitigation measure for new development as well as for significant re-roofing projects.	C-16
3.	For mitigation measure <b>GHG-4</b> the City should consider developing a program into which developers pay a mitigation fee for the greenhouse gas emissions of the new housing they build. This fund could then provide incentive funds for owners to carry out energy efficiency retrofits for existing homes, as well as solar panel installations (page 12-28).	C-17
4.	For mitigation measure <b>GHG-14</b> SMAQMD recommends the City also adopt policies to reduce organic (food and green) waste from commercial entities, based on the requirements in AB 1826 (page 12-31).	C-18
5.	For mitigation measure <b>GHG-15</b> SMAQMD recommends the City encourage the installation of greywater systems for new homes, and adopt a streamlined permitting processes for existing buildings to add greywater systems (pages 12-31 and 12-32).	C-19
6.	SMAQMD requests the City provide a target date to achieve the TDM reductions set forth in mitigation measure <b>GHG-10</b> (page 12-30).	C-20
7.	The addition of <b>Policy NCR 3.2.8 GHG Analysis Streamlining for Projects Consistent</b> with the <b>General Plan</b> along with section 3.1 in Appendix H should be very helpful in implementing the City's Climate Action Plan for new development and providing CEQA streamlining (page 12-32).	C-21
8.		C-22
9.	updated references to the correct mitigation measures (pages 12-33 and 12-38).	C-23
10.	SMAQMD recommends the City include a discussion of the likelihood of longer fire seasons due to climate change (extended hot, dry seasons, and drier vegetation).  Changing climate conditions may also lead to fires spreading more rapidly into	C-24

Mr. Johnson Folsom 2035 General Plan April 20, 2018 Page 4

	residential neighborhoods and new zones, such as the 2017 Sonoma and Napa fires (page 15-5).	C-24
11.	The City should include the impacts of earlier spring snowmelt, due to warmer average temperatures and more rain-on-snow events, on flood risks at Folsom Dam and other dams. Stronger storms and atmospheric rivers can also increase flood risk (page 16-33).	C-25
12.	SMAQMD appreciates the City's commitment to establishing VMT thresholds for CEQA in compliance with SB 743, through Implementation Program <b>M-14</b> once the State CEQA Guidelines are finalized (page 17-32).	C-26
13.	Mitigation measure <b>T-1</b> calls for potential roadway improvements that could result in impacts to pedestrian and bicycle travel. The DEIR notes that mitigation measure <b>T-2</b> , which includes pedestrian and bicycle improvements, could help mitigate adverse traffic effects. Because pedestrian and bicycle facility design must be context sensitive to be effective, public input is especially important to their development. SMAQMD recommends the DEIR explicitly state opportunities for public input in developing these improvements (pages 17-50 and 17-51).	C-27
14.	Mitigation measure <b>T-3</b> calls for implementing new interchanges and improvements to US Highway 50. The language indicates these improvements are assumed in transportation modeling for the DEIR. SMAQMD recommends the DEIR explicitly describe the incorporation of the interchanges and improvements into the transportation modeling, and any provisions for future environmental review as	C-28

My staff and I are available to discuss these comments further. Please contact Karen Huss at 916-874-4881 or <a href="mailto:khuss@airquality.org">khuss@airquality.org</a>.

Sincerely,

Paul Philley, AICP

CEQA and Land Use Program Supervisor

necessary (pages 17-52 and 17-53).

Attachments

Resiliency Suggestions for General Plan Global Climate Change Chapter Recommendations

Cc: Joseph J. Hurley, SMAQMD Karen Huss, SMAQMD Molly Wright, SMAQMD Shelley Jiang, SMAQMD Comment C-3 below references this attachment to the comment letter.

# **Climate Resiliency Attachment**

#### **Land Use Element**

- LU 1.1.14 Promote Resiliency:
  - Examples of measurable resiliency policies should be included. One example could be a commitment to evaluating future projections for wildfire risk and flood risk before permitting new development. Stronger storms and increased flood risk, due to more winter precipitation falling as rain stead of snow, and shifts in snowmelt timing can affect housing and land use planning near creeks, rivers, and the reservoir. Greater wildfire risk can also affect foothill communities.
  - SMAQMD also recommends that Folsom consider the benefits of leaving some spaces undeveloped for flood and fire safety, as open space, green space, and natural lands can absorb, retain, and slow down flood water. In addition, they can also provide recreational benefits for Folsom residents.
  - Climate impacts are regional and do not recognize jurisdictional borders, while mitigation measures for forest fires, flood, and drought are generally most effective in the headwaters and watersheds of the Sierra Nevada. Consequently, SMAQMD suggests that Folsom adopts a policy to support increased collaboration with upstream and neighboring jurisdictions, as well as regional groups such as the Capital Region Climate Readiness Collaborative, the Sierra Nevada Conservancy, the Sierra Business Council, and other regional organizations to keep track of the latest updates in adaptation policy and best practices and partner effectively on adaptation projects.

#### **Mobility Element**

- SMAQMD recommends climate resilience be reflected in the Mobility Element by considering
  mobility and access by older, aging populations in the neighborhood, who may prefer more
  pedestrian-, transit- and rideshare-friendly facilities, which can help them access not only
  medical care but also cooling centers on hot days. In addition, flooding and wildfires will make
  it important to identify redundant/back-up evacuation routes for neighborhoods that are
  identified as being in high-flood risk or high-wildfire risk areas.
- M1.1.10. Facilities for Emerging Vehicles
  - SMAQMD recommends that facilities for emerging vehicles be made mandatory for residential and commercial developments of a certain minimum size.
- M4.1.2 Roadway Maintenance
  - SMAQMD recommends that the City ensures that roadway maintenance procedures accounts for increasing patterns of warmer temperatures, heat waves, and urban heat island effect in material selection for pavements and other surfaces, roadway design, and maintenance, including the inclusion of cool paving and urban tree canopy where possible.

# **Natural and Cultural Resources Element**

 SMAQMD recommends the Natural and Cultural Resources Element include a climate resilience-related policy to help Folsom's natural resources to be resilient to the expected impacts of climate change, or incorporate climate adaptation into existing policies. This can include the incorporation of climate change impacts into vegetative and wildlife analysis (NCR

- 1.1.2), as well as the identification of riparian and wetland habitats critical for Folsom's climate resilience, including long-term water supply, habitat conservation, fire-risk reduction, and the flood-mitigation benefits for areas further downstream. Open space conservation can also prevent an important buffer against wildfires. The predicted temperatures and precipitation levels for 30 to 50 years in the future should be considered for all tree plantings, to ensure the longevity of the trees as well as their associated benefits with shading and urban heat island reduction, air quality, stormwater management, and more. For example, Los Angeles is looking at trees that thrive in Phoenix today as a guide for planting future trees.
- SMAQMD recommends adding a policy to develop and adopt incentive programs to reduce
  greenhouse gas emissions in existing development. For example, developers of new projects
  could pay into a fund, as part of their mitigation measure for operational greenhouse gas
  emissions, to help support energy efficiency retrofits in existing housing. Or, the city could
  provide property tax reductions for homeowners and building owners that carry out energyefficiency retrofits.

### **Public Facilities and Services Element**

- Include future projections of stronger storms and atmospheric river systems and more rainon-snow events, and earlier spring run-off when maintain stormwater facilities and updating stormwater management guidelines.
- SMAQMD recommends that the City of Folsom adopt the use of recycled greywater for parks
  and trees irrigation so that the goals of increasing parks and green spaces, and planting new
  and maintaining existing trees do not conflict with goals of water use reduction, by adding a
  new policy or expanding PFS 3.1.12, Non-Potable Water.

### **Parks and Recreation Element**

• SMAQMD recommends that the City of Folsom ensure sufficient access to water fountains and shade along bike paths, trails, other active transportation corridors, and playgrounds to provide important safeguards on hot days.

# **Safety and Noise Element**

- SMAQMD recommends that the City of Folsom use up-to-date flood risk projections that are informed by climate change, which will likely increase the risk of stronger storms and earlier spring snowmelt.
- SMAQMD recommends that the City of Folsom coordinate open space and wetland conservation with flood protection goals.
- SMAQMD recommends that the City of Folsom identify any hazardous waste sites and critical facilities located within the 100-year and 200-year floodplain.

Comment C-15 below references this attachment to the comment letter.

# Draft EIR, Chapterl 2, Global Climate Change Recommendations

SMAQMD recommends the second paragraph in "The Physical Scientific Basis" section be written more clearly (page 12-1):

"Human-caused emissions of GHG emissions – chiefly from the production and combustion of fossil fuels – at levels greater than the natural ambient concentrations is intensifying the greenhouse gas effect, leading to rapid and unnatural warming of the earth's average temperatures, known as global climate change or global warming. Global climate change poses a real and significant hazard to human and natural systems, leading to unstable and extreme weather conditions, including drought, stronger storms and hurricanes, wildfires, flooding, and the spread of tropical diseases."

The "Greenhouse Gas Emissions Sources" section could be improved by including the following in the discussion (page 12-2):

- Provide specific examples of fossil fuel combustion, such as gasoline-powered engines (including cars and diesel), natural gas-power plants, and natural gaspowered boilers.
- For the sentence on the sources of methane emissions, add oil and gas production, and further breakdown "agricultural practices" to be more specific: the raising of cows as well as sheep for meat and dairy, rice cultivation, and burning vegetation (including forests and crop residue).
- Add HFCs to Emissions Sources. HFCs are highly potent GHG emissions generated primarily by refrigeration and air-conditioning equipment. HFC emissions are rising due to the increase in air-conditioning and refrigeration. ARB has made HFC regulation a key part of its SB 1383 strategy.

The presentation of ocean sequestration of carbon as positive is misleading (page 12-2), as this results in ocean acidification. The ocean becoming more acidic is very damaging to the ocean ecology and thus consequently the fishery and seafood industry.

SMAQMD recommends that the first paragraph on page 12-5 be updated to match scientific standards in the discussion of temperature increases, and to provide more context to the reader.

The use of the 1986-2005 period as a baseline for temperature increase is not the scientific standard, especially in a background-setting context. Under the <u>Paris Agreement</u>, the global target is to limit global average temperature increase to not more than 2 degrees Celsius above the <u>pre-industrial average</u>, which the IPCC generally uses as the period just before and after <u>1750</u>, which is before the invention of the steam engine significantly altered society. The use of the 1986-2005 average and the 2000 averages, without additional explanation and analysis, may inadvertently confuse and trivialize the issue of climate change for the general public, to whom the difference of a few degrees may not seem impactful. It may be

more helpful to note that 1) the target to limit global average temperature increases to 2 degrees Celsius or lower; 2) that while this number may seem small, variations in the <u>global average</u> can lead to significant extreme changes on a localized scale, such as deadly heat waves in Europe in 2003 and in California in 2006; and 3) that temperatures have increased rapidly, with 17 of the 18 hottest years all occurring since 2001.

- The sentence "Physical conditions beyond average temperatures could be indirectly affected by the accumulation of GHG emissions" comes across as passive and ambivalent. "Rising global average temperatures can affect our climate and weather systems, with additional disruptions for precipitation, drought, flooding, ocean acidification, agriculture, wildfires, and other impacts." This is more specific and relatable.
- We also recommend framing the discussion of climate impacts to relate more directly to the daily life of Folsom residents. For example, a loss of Sierra snowpack and increase in tree mortality could affect Folsom residents' recreational experience. It could also reduce the number of visitors that stop in Folsom to eat or shop on their way to or from the Sierra Nevada. Increasing heat & heat waves and spread of ticks and other vector-borne diseases such as West Nile will be a public health threat. Increased heat and drought would also negatively affect grape production and winemaking. While sea-level rise is important globally, it has less bearing for Folsom and could perhaps be omitted.

SMAQMD recommends the following additions to the "State Regulations" section in Table 12-3, Regulatory Requirements:

- AB 1826: Requires local jurisdictions to implement organic (food and green waste) recycling program for commercial businesses and green waste only for multi-family units.
- SB 605 and SB 1383: SB 605 (Lara, 2014) directed the Air Resources Board (ARB) to develop a comprehensive short-lived climate protection strategy, and SB 1383 (Lara, 2016) directed ARB to implement the plan and set statewide 2030 emissions targets for methane, anthropogenic black carbon, and HFCs. ARB recently adopted a <u>rulemaking</u> to ban the uses of high-GWP gases for stationary refrigeration and foam end-uses that will start to take effect in September 2018.
- SB 1386 (Wolk, 2016): Declares that it is the state's policy that the protection and management of natural and working lands is an important strategy in meeting the state's greenhouse gas reduction goals.
- SB 1275 (De Léon, 2014): Charge Ahead Initiative, sets a goal of 1 million ZEVs and near-zero emissions vehicles by 2020.
- AB 1092 (Levine, 2013): Requires the Building Standards Commission to adopt mandatory building standards for the installation of future electric vehicle charging infrastructure for parking spaces in multifamily dwellings and nonresidential development.

# Response to Letter C

**Commenter** Sacramento Metropolitan Air Quality Management District (SMAQMD) April 20, 2018

- C-1 The comment states that, overall, the City of Folsom has prepared a comprehensive general plan and associated DPEIR. Further, the comment explains the role of SMAQMD, which is to provide review of environmental documents and public comments, to influence agencies to make decisions that protect the air quality and health of the region and citizens.
  - The comment is introductory and does not identify any issues related to the adequacy of the DPEIR. No changes to the PEIR are necessary.
- C-2 The comment recommends including the Living Building Challenge as another example of sustainable building standards in 2035 General Plan proposed Policy LU 1.1.13 Sustainable Building Practices.
  - The City acknowledges SMAQMD's comment. The comment raises policy issues and does not identify any issues related to the adequacy of the DPEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff's response to this comment will be included as an appendix to the staff report. Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.
- C-3 The comment recommends that 2035 General Plan proposed Policies LU 1.1.14 Sustainable Building Practices and Goal NCR 3.2 Improve Sustainability be cross-referenced other proposed policies that promote resilience and modified to provide more specific measurable resilience policies. The comment references an attachment to the SMAQMD letter entitled *Climate Resiliency Attachments*, and encourages the City to include the recommendations of the attachment in the 2035 General Plan.

The City acknowledges SMAQMD's comment. The comment raises policy issues and does not identify any issues related to the adequacy of the DPEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff's response to this comment will be included as an appendix to the staff report. Although the comment does not raise issues related to the PEIR, because DPEIR Chapter 12, *Global Climate Change*, summarizes proposed 2035 General Plan policies in Section 12.1.3, this section of the DPEIR is being updated to reflect 2035 General Plan policies that have been modified in response to this comment. See FPEIR Chapter 4, *Changes to Text of the Environmental Documents*.

Modification of Section 12.1.3 in Chapter 12 would not change any environmental analyses or environmental conclusions set forth in the chapter. Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no additional changes to the PEIR are required.

C-4 The comment supports the 2035 General Plan policies regarding transit supportive land uses adjacent to Light Rail stations. The comment requests that the City establish a list of specific auto-oriented land uses that would be prohibited in the vicinity of Light Rail stations.

The City acknowledges SMAQMD's comment. The comment raises policy issues and does not identify any issues related to the adequacy of the DPEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff's response to this comment will be included as an appendix to the staff report. Although the comment does not raise issues related to the PEIR, because DPEIR Chapter 12, *Global Climate Change*, summarizes proposed 2035 General Plan policies and implementation programs in Section 12.1.3, this section of the DPEIR is being updated to reflect 2035 General Plan policies and implementation programs that have been modified in response to this comment. See FPEIR Chapter 4, *Changes to Text of the Environmental Documents*.

Modification of Section 12.1.3 in Chapter 12 would not change any environmental analyses or environmental conclusions set forth in the chapter. Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no additional changes to the PEIR are required.

C-5 The comment recommends expanding Policy LU 9.1.8 Cool Paving to include cool roof coverage on new commercial and re-roofing of existing commercial buildings and encourage cool roofs for residential buildings. The comment also provides examples of cool and permeable paving applications.

The City acknowledges SMAQMD's comment. The comment raises policy issues and does not identify any issues related to the adequacy of the DPEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff's response to this comment will be included as an appendix to the staff report. Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

C-6 The comment states that transportation policies (M 1.1.7, M 1.1.9, and M 7.1.2) are critical to reduce single occupant vehicle trips and vehicle miles traveled in the City. The comment also recommends including a baseline and target year for meeting the performance standards of Implementation Program M-1 Transportation Demand Management and PFS-15 Reduce VMT in City Operations.

Measure T-3 Adopt Citywide TDM is explained on Page 3 in Attachment 1 of Appendix H of the DPEIR under the Built Environment and Transportation Measures, and the reduction target of 15 percent VMT and target year of 2035 is also explained. However, the baseline year is not specified for measure T-3. Measure T-4 Adopt TDM for City Employees is also explained on Page 3 in Attachment 1 of Appendix H of the DPEIR under the Built Environment and Transportation Measures, and the reduction target of 20 percent VMT and target year of 2035 is also explained. However, the baseline year is not specified for this measure.

The following changes are made to page 3 in Attachment 1 of Appendix H of the DPEIR here and in Chapter 4, *Changes to Text of the Environmental Documents*, of this FPEIR.

Measure T-3: Reduce commute VMT in new residential and non-residential development by 15 percent over baseline year (2014) VMT by 2035. Applies CAPCOA TRT-1, TRT-2, TRT-3 to all new VMT in City (excluding city employees).

Measure T-4: Reduce City employee commute vehicle miles traveled (VMT) by 20 percent over baseline year (2014) VMT by 2035. Applies CAPCOA TRT-1, TRT-2, TRT-3 to all VMT associated with City employees.

Although the comment does not raise issues related to the PEIR, because DPEIR Chapter 12, *Global Climate Change*, summarizes proposed 2035 General Plan policies and implementation programs in Section 12.1.3, this section of the DPEIR is being updated to reflect 2035 General Plan policies and implementation programs that have been modified in response to this comment. See FPEIR Chapter 4, *Changes to Text of the Environmental Documents*.

Modification of Section 12.1.3 in Chapter 12 would not change any environmental analyses or environmental conclusions set forth in the chapter. Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no additional changes to the PEIR are required.

C-7 The comment commends the inclusion of transportation-related policies (M 1.1.10, M 4.2.4, and M 6.1.3) and requests additional detail be added to Policy M 6.1.3 Support Zero- and Low- Emission Vehicle Adoption, to promote electric vehicle charging stations at multi-family residential units and to set a minimum requirement for commercial developments.

Measure T-8 Install Electric Vehicle Charging Stations, as part of the GHG reduction strategy, is intended to implement Policy M 6.1.3 and sets a target for the City to install 560 new electric vehicle stations throughout the City by year 2035. This target was the basis for the reductions in emissions quantified for this measure. The description of this measure and the calculations are provided in Attachment 1 of Appendix H of the DPEIR under the Built Environment and Transportation Measures, on Page 3.

Because a target for new EV charging installation has been set and accounted for in Measure T-8, Policy M 6.1.3 was not revised to include a minimum requirement. However, the policy has been revised to promote installing EV charging stations at multi-family units.

The following revisions are made to Policy M 4.2.4 in the Draft General Plan Policy Document, and on page 12-15 of the DPEIR.

Policy M 4.2.4: Electric Vehicle Charging Stations. Encourage the installation of electric vehicle charging stations in parking spaces throughout the city, <u>prioritizing</u> installations at multi-family residential units.

Although the comment does not raise issues related to the PEIR, because DPEIR Chapter 12, *Global Climate Change*, summarizes proposed 2035 General Plan policies and implementation programs in Section 12.1.3, this section of the DPEIR is being updated to reflect 2035 General Plan policies and implementation programs that have been modified in response to this comment. See FPEIR Chapter 4, *Changes to Text of the Environmental Documents*.

Modification of Section 12.1.3 in Chapter 12 would not change any environmental analyses or environmental conclusions set forth in the chapter. Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no additional changes to the PEIR are required.

C-8 The comment recommends that 2035 General Plan proposed Policy NCR 1.1.8 Planting in New Development and Implementation Program NCR-1 Urban Forest Plan be modified to include tree planting in existing development and within designated open space. The comment also recommends that the City consider a citywide tree canopy goal in Implementation Program NCR-1 Urban Forest Plan.

The City acknowledges SMAQMD's comment. The comment raises policy issues and does not identify any issues related to the adequacy of the DPEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff's response to this comment will be included as an appendix to the staff report. Although the comment does not raise issues related to the PEIR, because DPEIR Chapter 12, *Global Climate Change*, summarizes proposed 2035 General Plan policies and implementation programs in Section 12.1.3, this section of the DPEIR is being updated to reflect 2035 General Plan policies and implementation programs that have been modified in response to this comment. See FPEIR Chapter 4, *Changes to Text of the Environmental Documents*.

Modification of Section 12.1.3 in Chapter 12 would not change any environmental analyses or environmental conclusions set forth in the chapter. Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no additional changes to the PEIR are required.

C-9 The comment recommends that 2035 General Plan proposed Policy NCR 3.1.6 Sensitive Uses be modified to reference the City's ability under its police powers to regulate exposure to mobile and stationary source toxic air contaminants.

The City acknowledges SMAQMD's comment. The comment raises policy issues and does not identify any issues related to the adequacy of the DPEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff's response to this comment will be included as an appendix to the staff report. Although the comment does not raise issues related to the PEIR, because DPEIR Chapter 12, *Global Climate Change*, summarizes proposed 2035 General Plan policies and implementation programs in Section 12.1.3, this section of the DPEIR is being updated to reflect 2035 General Plan policies and implementation programs that have been modified in response to this comment. See FPEIR Chapter 4, *Changes to Text of the Environmental Documents*.

Modification of Section 12.1.3 in Chapter 12 would not change any environmental analyses or environmental conclusions set forth in the chapter. Because the comment does not raise any

concerns regarding the content or environmental conclusions of the DPEIR, no additional changes to the PEIR are required.

C-10 The comment requests that Policy NCR 3.2.6 Coordination with SMAQMD be clarified to apply to both construction and operational reduction measures.

The comment raises policy issues and does not identify any issues related to the adequacy of the DPEIR, and no further response is necessary under CEQA. However, the recommended change has been made to provide additional clarity.

The following revisions are made to Policy NCR 3.2.6 in the Draft General Plan Policy Document, and on page 12-17 of the DPEIR.

**Policy NCR 3.2.6: Coordination with SMAQMD.** Coordinate with SMAQMD to ensure projects incorporate feasible mitigation measures to reduce <u>both construction</u> <u>and operational</u> GHG emissions and air pollution if not already provided for through project design.

Although the comment does not raise issues related to the PEIR, because DPEIR Chapter 12, *Global Climate Change*, summarizes proposed 2035 General Plan policies and implementation programs in Section 12.1.3, this section of the DPEIR is being updated to reflect 2035 General Plan policies and implementation programs that have been modified in response to this comment. See FPEIR Chapter 4, *Changes to Text of the Environmental Documents*.

Modification of Section 12.1.3 in Chapter 12 would not change any environmental analyses or environmental conclusions set forth in the chapter. Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no additional changes to the PEIR are required.

C-11 The comment states that language encouraging energy-efficient, net-zero, and all-electric building design and site planning, be added to Policy NCR 3.2.3 Greenhouse Gas Reduction in New Development.

The City acknowledges SMAQMD's comment. The comment raises policy issues and does not identify any issues related to the adequacy of the DPEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff's response to this comment will be included as an appendix to the staff report. Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

Policy NCR 3.2.3 Greenhouse Gas Reduction in New Development is intended to promote development that reduces GHG emissions. The policy lists numerous strategies that the City can consider to reduce greenhouse gas emissions, including considering location and proximity of new development to reduce reliance on vehicles, as well as promoting energy-efficient building design. The policy currently includes language for new development to consider site

- planning and does not preclude the use of specific building design requirements (e.g., net-zero, all-electric) as the comment states. No revisions are made to Policy NCR 3.2.3 or the PEIR.
- C-12 The comment states that Policy PFS 8.1.7 Energy Conservation in City Operations should include both a baseline and target year for achieving the 20 percent energy use reduction target.
  - Measure E-5 Improve Energy Efficiency in City-Owned Facilities, as part of the GHG reduction strategy documented in Appendix H to the DPEIR, is intended to implement Policy PFS 8.1.7 Energy Conservation in City Operations and sets a target of 20 percent below the baseline year of 2014 by 2035. The description of this measure, including the established reduction target and baseline year, is in Attachment 1 of Appendix H of the DPEIR under the Energy Measures, on Page 5. Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.
- C-13 The comment states that a reduction target should be included in Policy PFS 8.1.8 City Fleet Fuel Efficiency.
  - Measure T-7 Alternative Fuel in City Fleet, as part of the GHG reduction strategy, is intended to implement Policy PFS 8.1.8, and sets a target for the City to use high performance renewable diesel and electric vehicles in city fleets. The measure sets targets to achieve 100 percent use of high performance renewable diesel for all diesel fuel needs and 100 percent electric vehicles for all City passenger vehicles. This measure excludes fire and law enforcement fleets. The description of this measure, including the established reduction target, is in Attachment 1 of Appendix H of the DPEIR under the Built Environment and Transportation Measures, on Page 3. Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.
- C-14 The comment states that a reference to AB 1826 should be included in Policy PFS 9.1.4 Composting.
  - Measure SW-2 Divert Organic Waste from Landfills, as part of the GHG reduction strategy, is intended to implement Policy PFS 9.1.4, and sets a target for the City to divert 75 percent of waste from landfills and 50 percent of organic waste from residential and commercial land uses by 2035. The description of this measure, including the established reduction targets, is in Attachment 1 of Appendix H of the DPEIR under the Solid Waste Measures, on Page 4. Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.
- C-15 The comment suggests revisions be made to DPEIR Chapter 12, *Global Climate Change*, Section 12.1.1, Environmental Setting, to rephrase language for clarity. Further the comment suggests adding several State regulatory requirements to section 12.1.2, Regulatory Setting, of Chapter 12, *Global Climate Change*. The comment references an attachment to the SMAQMD letter entitled *Draft EIR*, *Chapter 12*, *Global Climate Change Recommendations*, and encourages the City to modify the DPEIR text accordingly. See FPEIR Chapter 4, *Changes to Text of the Environmental Documents*.

None of the suggested revisions identify any issues related to the adequacy of the DPEIR. Further, the suggested information would not result in any changes to the GHG analysis in the DPEIR and therefore are not necessary to be included. Nonetheless, to provide additional information and clarity the following changes are made in Chapter 12 Global Climate Change.

The 4<sup>th</sup> paragraph on Page 12-2 of the DPEIR.

Hydrofluorocarbons (HFCs) are highly potent GHG emissions generated primarily by refrigeration and air-conditioning equipment.

The 2<sup>nd</sup> paragraph on Page 12-5

Physical conditions beyond average temperatures could be indirectly affected by the accumulation of GHG emissions. Rising global average temperatures can affect our climate and weather systems, with additional disruptions from precipitation, drought, flooding, ocean acidification, wildfires, and other impacts.

These changes to the EIR would not change the environmental analyses or conclusions set forth in the DPEIR. Therefore, no further modification of the PEIR would be necessary.

C-16 The comment recommends including cool roofs as greenhouse gas emissions mitigation for new development as well as for significant re-roofing.

Cool roofs are already required by California building code; therefore, they are not considered mitigation. No changes to the PEIR are necessary.

C-17 The comment suggests that the City develop a program into which developers pay a mitigation fee for GHG emissions generated by new development that could be used to fund energy efficiency retrofits for existing homes.

Mitigation Measure GHG-4 establishes a new implementation program, PFS-24 Energy Efficiency and Renewable Energy Retrofits and Programs, which includes a list of actions that the City can undertake to promote and expand existing programs to increase energy-efficiency and the use of renewable energy in existing buildings, including providing incentives and rebates. Further, Policy NCR 3.2.8 GHG Analysis Streamlining for Projects Consistent with the General Plan provides a mechanism for new development to implement GHG reduction strategies, consistent with measures outlined on page H-17 of Appendix H. As explained on page H-17, new development that can demonstrate consistency with the GHG reduction measures integrated within the plan, would meet the requirements of CEQA Guideline Section 15183.5 and would meet their obligation to mitigate GHG emissions associated with the new development. Additionally, as stated in Appendix H and summarized in Chapter 12 of the EIR on page 12-33, the GHG reduction strategy and associated mitigation measures identified in the EIR are sufficient to meet the City's 2030 target and the impact is considered less than significant. Thus, requiring additional fees for mitigating GHG emissions would not be

necessary. Nonetheless, the measures included in GHG-4 do not preclude the City from setting up such a program at some point should it decide to do so. Thus, given that new development within the City of Folsom could adopt incorporate specific GHG reduction measures consistent with the GHG reduction strategy/plan, no additional mitigation fee program is needed. Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

C-18 The comment recommends the City adopt policies to reduce organic waste, in accordance to requirements of AB 1826.

See response to comment C-14.

C-19 The comment recommends that Mitigation Measure GHG-15 be expanded to encourage installation of greywater systems in new homes and adopt a streamlined approach for permitting greywater systems in existing homes.

Mitigation Measure GHG-15 establishes Implementation Program PFS-27 Reduce Water Consumption in New Residential Development, which includes an action for new development to adopt measures included in CALGreen Tier 1 related to water efficiency. These measures include options for greywater systems. The measure applies to new development only and as shown in Table 12-4 of the DPEIR, the City of Folsom meets the GHG reduction target for 2030 with incorporation of all recommended mitigation measures. Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

C-20 The comment requests that a target date be included in GHG-10 for achieving the recommended reductions in VMT.

See response to comment C-6.

C-21 The comment states that the inclusion of Policy NCR 3.2.8 GHG Analysis Streamlining for Projects Consistent with the General Plan would be helpful. The comment does not request any changes be made.

Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

C-22 The comment points out that Table 12-4 identified a GHG reduction target for the year 2035 and that the City is not on track to meet it. The comment further suggests that additional mitigation measures should be included to meet the 2035 target.

As discussed under Impact GHG-1, with incorporation of all recommended mitigation measures, the City of Folsom is on track to meet the 2030, State-recommended limit of 6 metric tons of carbon dioxide per capita (MTCO<sub>2</sub>e). The discussion on page 12-34 goes on to explain that the 2030 target has been established by SB 32 and meeting the recommended limit of 6 MTCO<sub>2</sub>e by 2030 would be consistent with the targets established by California law. Although the General Plan buildout horizon is 2035, beyond the State's established 2030 target year, as shown in Table 12-4, the City would meet the 2030 GHG emissions targets. Thus,

current State-mandated emissions reduction targets and target year 2030 are the basis for the significance conclusion, not emissions in 2035.

Impact GHG-2 discusses long-term GHG emissions projections for years beyond the currently established target year of 2030. The General Plan buildout horizon is the year 2035 and emissions were forecasted to years 2035 and 2050 and provided for informational purposes only. It is acknowledged that Table 12-4 could be misleading by implying that a GHG reduction target was set for the General Plan buildout year of 2035. The following corrections are made to the DPEIR to help clarify the analysis. See FPEIR Chapter 4, *Changes to Text of the Environmental Documents*.

Titles in Table 12-4 on pages 12-36 and 12-37 of the DPEIR.

Community Totals, and Targets (years 2020 and 2030), and Long-Term Goals (years 2035 and 2050)<sup>43</sup>

Footnote added to Table 12-4 on page 12-37 of the DPEIR to clarify the difference between targets and goals, as follows.

3: GHG emissions targets are set based on established State-mandated GHG emissions limits for years 2020 and 2030 by AB 32 and SB 32, respectively. Goals are used to represent long-term GHG levels for years beyond what is currently mandated by law. Goals are provided for informational purposes only and show anticipated GHG emissions for future years (2035 and 2050).

First paragraph of page 12-33 of the DPEIR

Further, per capita emissions for target year 2030 would be 5.9 MTCO<sub>2</sub>e under the 2035 General Plan and full implementation of the proposed mitigation measures identified above, which would be below the state-recommended limit of 6 MTCO<sub>2</sub>e per capita. In addition, emissions associated with municipal operations would be consistent with State goals targets to achieve emission levels of 40 percent below 1990 levels, assuming full implementation of the proposed mitigation measures identified above.

These changes to the EIR would not change the environmental analyses or conclusions set forth in the DPEIR. Therefore, no further modification of the PEIR would be necessary.

C-23 The comment points out incorrect references to Mitigation Measures GHG-16 and GHG-17 on pages 12-33 and 12-38.

The following corrections are made to the DPEIR. See FPEIR Chapter 4, Changes to Text of the Environmental Documents.

Page 12-32 of the DPEIR under Environmental Effects of Measures.

Environmental Effects of Measures: Implementation of Mitigation Measures GHG-1 through GHG-1516 would result in new policies and regulations for reducing GHG emissions. Measures include creating new programs or funding sources, updating the municipal code, and revising overall GHG reduction targets for various sectors. Implementation of the measures would not result in an expansion of the area within the Planning Area devoted to urbanized land uses and would not act to increase the intensity of existing or planned land uses. These measures would not directly result in any increased construction activities or increases in operational-related GHG emissions. No environmental effects would occur beyond those identified in this PEIR.

Page 12-33 1<sup>st</sup> paragraph of the DPEIR.

Thus, considering the established State targets set by SB 32 for 2030, the proposed 2035 General Plan would not conflict with any applicable plan, policy, or regulation adopted for reducing GHG emissions. With incorporation of Mitigation Measures GHG-1 through GHG-1516, this impact would be reduced to a less-than-significant level.

Page 12-33 3<sup>rd</sup> paragraph of the DPEIR.

As discussed above under Impact GHG-1, adoption of the proposed 2035 General Plan and incorporation of Mitigation Measures GHG-1 through GHG-1416 would result in emissions reductions that would ensure the City of Folsom would be consistent with the 2030 statewide emissions limit of 6 MTCO<sub>2</sub>e per capita. Proposed mitigation measures identified under Impact GHG-1 would result in substantial reductions in GHG emissions from various sectors by improving energy efficiency in existing buildings, expanding on renewable energy sources, requiring ZNE renewable energy sources and improved energy efficiency in for all new buildings, reducing VMT through various measures and by focusing development in high-density nodes, reducing waste generation, and conserving water. Because of these policies, programs, and mitigation measures GHG emissions, on a per capita basis, would continue to decline beyond 2030. As shown in Table 12-4, 2035 per capita emissions would be reduced to approximately 5.4 MTCO<sub>2</sub>e and 2050 per capita emissions would be reduced to approximately 5.0 MTCO<sub>2</sub>e.

Title of Table 12-4 on page 12-35 of the DPEIR.

Summary of GHG Emissions and Reduction Measures Identified in General Plan and Mitigation Measures GHG-1 to GHG-<u>1415</u>

Page 12-38 2<sup>nd</sup> paragraph of the DPEIR

Implementation of Mitigation Measure GHG-4617 would ensure the City continues to monitor progress towards achieving adopted 2020 and 2030 GHG emissions reduction targets, as well as longer-term goals to 2050. Further, Mitigation Measure GHG-16 commits the City to updating their GHG Inventory and GHG Strategy contained within the 2035 General Plan to ensure that emissions reductions are achieved and sufficient to meet future goals or new targets that may be established by the State, and that the most current and feasible GHG emission reducing policies and programs are in place to reduce emissions. Nonetheless, because total GHG emissions reductions quantified to date for both the proposed GPU and mitigation measures identified above cannot demonstrate how the long-term statewide emissions reduction goal of 2 MTCO<sub>2</sub>e by 2050 would be achieved, this impact would remain significant and unavoidable.

In addition, text revisions were made in Appendix H, including pages H-8 through H-14, Table 7, Table 7, Figure 1, and Figure 2, to reflect the revisions to the DPEIR described above. Refer to Attachment A of the FEIR for details.

These changes to the EIR would not change the environmental analyses or conclusions set forth in the DPEIR. Therefore, no further modification of the PEIR would be necessary.

- C-24 The comment recommends including a discussion of the likelihood of longer fire seasons and larger fire zones because of climate change.
  - Page 12-6 of the DPEIR includes a discussion of the potential increased risk of fire from climate change. Further, these impacts are discussed in Impact GHG-3 on pages 12-39 through 12-41. Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.
- C-25 The comment requests that the City include information in the PEIR related to the effects of climate change on future regional flood events, and cites page 16-33 of DPEIR Chapter 16, *Public Services and Recreation Resources*, as an appropriate location.

Page 16-33 as cited in the comment contains proposed 2035 General Plan policies related to recreation, and a significance criterion associated with the construction of new or physically altered facilities for fire or police protection services, or schools. The DPEIR evaluates regional flood hazards in Chapter 14, *Hydrology and Water Quality*. Impact HWQ-6 of that chapter on page 14-33 evaluates flooding risk associated with dam failure.

Impact HWQ-6 is hereby amended to include the requested information as follows:

The principal risk related to inundation due to dam failures within the 2035 Plan Evaluation Area, including the FPASP area, and the area north of Highway 50, would be the failure of Folsom Dam, the Mormon Island Auxiliary Dam, or one of the wing dams or dykes, particularly as a result of a seismic event. The Local Hazard Mitigation Plan (Sacramento County 2016) contains the results of a simulation of the failure of one or more of the Folsom Dam system (Folsom Dam, one of the five dikes, the wing dam, or the Mormon Island Auxiliary Dam). This simulation estimated that such a failure would result in the inundation of more than 15,000 parcels within the city and place roughly 40,000 residents at risk. In addition, 91 critical facilities (e.g. emergency services, hospitals, schools, care facilities, critical infrastructure) would be within the inundation zone. Monetary losses were estimated at between 2.8 and 9.2 billion dollars.

As noted in the Local Hazard Mitigation Plan, the likelihood of dam failure is considered unlikely. As defined by the Local Hazard Mitigation Plan, "unlikely" is an event with a "less than 1 percent chance of occurrence in the next 100 years, or (with) a recurrence interval of greater than every 100 years. (Sacramento County 2016)

The 2016 Sacramento County Local Hazard Mitigation Plan evaluated the potential for climate change to affect the risk of dam failure, including Folsom Dam and its subsidiary dams. The Local Hazard Mitigation Plan stated that, "Increases in the volume and intensity of precipitation, as well as warmer and earlier springs accelerating the timing and rate of snow melt, could increase the potential for dam failure and uncontrolled releases in Sacramento County." However, according to the Local Hazard Mitigation Plan, even considering this information, the likelihood of a failure of Folsom Dam would be unlikely. (Sacramento County 2016a)

Additionally, most of the FPASP area would be outside of the inundation zone, as would the southeast portion of the city north of Highway 50. As indicated on Draft PEIR Figure 5-1, these two areas would be the locations of the majority of new urban development identified by the 2035 General Plan.

See FPEIR Chapter 4, *Changes to Text of the Environmental Documents*. This additional text would merely add clarifying information to the impact discussion and would not change the environmental analysis or conclusion set forth in the DPEIR for this impact. For these reasons, no further modification of the PEIR would be necessary.

C-26 The comment acknowledges the City's commitment to establish VMT thresholds in compliance with SB 375.

The City acknowledges SMAQMD's comment. Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

- C-27 This comment is related to the public outreach process during the design of pedestrian and bicycle improvements as set forth in DPEIR Mitigation Measure T-2. The comment requests that the public outreach process and procedures be outlined in the DPEIR.
  - The comment raises a question regarding the City's procedures for project development and planning. Although the comment requests that public outreach be discussed in the PEIR, project development and planning procedures are unrelated to environmental effects. Because the comment raises policy issues and does not identify any issues related to the adequacy of the DPEIR, no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff's response to this comment will be included as an appendix to the staff report. Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.
- C-28 This comment notes that DPEIR mitigation measure T-3 calls for implementing new US Highway 50 interchanges and improvements. The comment states that these improvements are incorporated into the traffic model used in the DPEIR, and requests that the DPEIR explain the incorporation of the improvements into the mode. The comment additionally requests that the DPEIR discuss any needed future review of the cited improvements.

As noted on page 17-36 of DPEIR Chapter 17, Transportation and Circulation, the DPEIR and the 2035 General Plan Circulation Element were based on SACOG's SACMET regional travel demand model. The major circulation improvements identified in mitigation measure T-3 previously had been adopted by the City of Folsom in its approval of the Folsom Plan Area Specific Plan (for the area south of Highway 50), and subsequently incorporated into the 1988 General Plan. The proposed 2035 General Plan Circulation includes the major components previously identified, as well as auxiliary facilities necessary to the safe operation of the interchanges. Additionally, the major components of mitigation measure T-3 were identified in 2016 Metropolitan Transportation Plan/Sustainable Communities Strategy adopted by SACOG. The first of the identified improvements, a new interchange on US Highway 50 and Empire Ranch Road is currently in the environmental review and project design stage leading to a forecast completion date of 2025 (Folsom 2018). Depending upon the mix of funds to be used for the completion of individual improvements, project specific environmental documents prepared to meet CEQA and NEPA requirements would be completed.

The comment does not identify any issues related to the adequacy of the Draft PEIR. Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

## Letter D

Powering forward. Together.



#### Sent Via E-Mail

April 17, 2018

Scott Johnson City of Folsom 50 Natoma Street Folsom, CA 95630 sjohnson@folsom.ca.us

Subject: City of Folsom 2035 General Plan Update / DEIR / 2017082054

Dear Mr. Johnson:

The Sacramento Municipal Utility District (SMUD) appreciates the opportunity to provide comments on the Draft Environmental Impact Report (DEIR) for the City of Folsom 2035 General Plan Update (Project, SCH 2017082054). SMUD is the primary energy provider for Sacramento County and the proposed Project area. SMUD's vision is to empower our customers with solutions and options that increase energy efficiency, protect the environment, reduce global warming, and lower the cost to serve our region. As a Responsible Agency, SMUD aims to ensure that the proposed General Plan limits the potential for significant environmental effects on SMUD facilities, employees, and customers.

It is our desire that the General Plan EIR will acknowledge any impacts related to the following. Previous comments that SMUD provided in past letters still apply.

- Overhead and or underground transmission and distribution line easements.
   Please view the following links on smud.org for more information regarding transmission encroachment:
  - https://www.smud.org/en/Business-Solutions-and-Rebates/Design-and-Construction-Services
  - https://www.smud.org/en/Corporate/Do-Business-with-SMUD/Land-Use/Transmission-Right-of-Way
- Utility line routing
- Electrical load needs/requirements
- Energy Efficiency
- Climate Change
- Cumulative impacts related to the need for increased electrical delivery
- SMUD's comments regarding Section 19.2.4 on pages 19-45 are below: Section 19.2.4

D-3

- "The Sacramento Municipal Utility District (SMUD) would provide electrical D-3 service. All electrical lines under 69 kilovolts (kV) would be routed underground within the rights-of-way of streets in the FPASP. SMUD has indicated that backbone electrical improvements necessary to support the FPASP area would include construction of three electric substations, at undefined locations (Folsom 2011)."
- The underlined statement is incorrect. SMUD will require PUE along all public streets to install underground 12kV facilities. Standard construction for 69KV is overhead. This information is consistent with comments SMUD provided in the letter dated 9/15/17 in response to the Notice of Preparation.
- Regarding the bolded statement, SMUD identified general areas for three substation sites, not "undefined locations" and also identified the 69kV routes required to serve the FPASP in all previous comment letters. SMUD completed an Addendum to the Folsom 2011 document in March 2017 (Ascent) and filed an NOD on 3/23/17 that addressed the first substation site and initial 69kV extension. Additionally, SMUD recently filed an NOD to address the 69kV south of the initial extension and along White Rock Road.

SMUD would like to be involved with discussing the above areas of interest as well as  $|_{D-4}$ discussing any other potential issues. We aim to be partners in the efficient and sustainable delivery of the proposed Project. Please ensure that the information included in this response is conveyed to the General Plan planners and the appropriate General Plan proponents.

Environmental leadership is a core value of SMUD and we look forward to collaborating with you on this General Plan. Again, we appreciate the opportunity to provide input on this If you have any questions regarding this letter, please contact SMUD's Environmental Management Specialist, Ammon Rice, at ammon.rice@smud.org or 916.732.7466.

Sincerely,

Nicole Goi

Cc:

Regional & Local Government Affairs Sacramento Municipal Utility District 6301 S Street, Mail Stop A313 Sacramento, CA 95817 nicole.goi@smud.org

Ammon Rice

Ticole For

SMUD CSC | 6301 S Street | P.O. Box 15830 | Sacramento, CA 95852-0830 | 1.888.742.7683 | smud.org

# Response to Letter D

**Commenter** Sacramento Municipal Utility District (SMUD) April 17, 2018

D-1 This is an introductory statement that identifies SMUD as the primary energy provider for Sacramento County and the proposed Project area, and describes its vision.

No response is necessary.

- D-2 The comment requests that the following issues be assessed in the PEIR:
  - Overhead and or underground transmission and distribution line easements.
  - Design and construction services
  - Transmission right-of-way
  - Utility line routing
  - Electrical load needs/requirements
  - Energy Efficiency
  - Climate Change
  - Cumulative impacts related to the need for increased electrical delivery

The DPEIR includes analyses of utilities needed to serve the 2035 General Plan Planning Area in Chapter 19, *Utilities and Service Systems*. Climate change, including the emissions of electricity generation, is assessed in DPEIR Chapter 12, *Global Climate Change*. Cumulative impacts and energy efficiency are assessed in Chapter 21, *Required CEQA Analyses*. For the topics cited in this response that are included in the DPEIR, the comment raises no issues related to the information, analysis, or environmental conclusions set forth in the DPEIR. Thus, no amendment of the PEIR is necessary to respond to these issues.

For specific evaluations of transmission and distribution lines, and utility line routing cited in the comment that have not been assessed in the DPEIR, such issues are beyond the scope of the environmental analysis. Section 15146 of the State CEQA Guidelines provides instruction on the degree of specificity necessary in various types of EIRs. Section 151469 states that:

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:

(b) An EIR on a project such as the adoption or amendment of ... a local general plan 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.

Because the project assessed in the Draft PEIR is the 2035 General Plan, the analysis focuses on the secondary effects of constructing and operating urban uses and supporting infrastructure engendered by the adoption of the 2035 General Plan, including electricity facilities. For additional information regarding the level of detail used in the environmental analysis, refer to Chapter 1, *Introduction*, and Chapter 5, *Introduction to the Analysis*, of the Draft

PEIR. Finally, potential future land uses proposed in the 2035 General Plan are limited to the Folsom Plan Area Specific Plan (FPASP) area south of Highway 50, and scattered new infill development north of Highway 50. For the FPASP area, SMUD has worked closely with the City to define and implement the facilities necessary to provide electric service to urban uses within this area. Because the comment raises issues that are beyond the appropriate scope of the Draft PEIR as established by the State CEQA Guidelines, no modification of the PEIR is necessary to respond to the comment. Since the comment does not raise any appropriate concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

D-3 The comment suggests corrections to Impact USS-6 on page 19-45 (Chapter 19, *Utilities and Service Systems*) of the Draft PEIR.

Regarding the comments request to amend Impact USS-6, this impact statement has been modified as follows. This change does not alter the environmental conclusion of the Draft PEIR.

• The Sacramento Municipal Utility District (SMUD) would provide electrical service. All 12 kilovolt (12kV) electrical lines under 69 kilovolts (kV) would be routed underground within public utility easements along the rights-of-way of streets in the FPASP. SMUD has indicated that backbone electrical improvements necessary to support the FPASP area would include construction of three electric substations, within generally defined at undefined locations (Folsom 2011, SMUD 2018). As FPASP development has been initiated during 2018, SMUD has sited the first of the three substations and has routed the two extensions of 69kV lines needed to serve the initial phases of FPASP area development. (Folsom 2011, SMUD 2018).

Because the comment does not raise any concern regarding the environmental conclusions of the DPEIR, no additional changes to the PEIR are necessary.

D-4 This is an summary statement that identifies SMUD's desire to collaborate as a partner in the efficient and sustainable delivery of the proposed project.

No response is necessary.

#### Letter E

From: Kevin Mallory <a href="mailto:kmallory@newfolsom.com">kmallory@newfolsom.com</a>

Sent: Thursday, March 22, 2018 10:47 AM

To: Scott Johnson <sjohnson@folsom.ca.us>; Pam Johns <pjohns@folsom.ca.us> Cc: Roger Gaylord <rgaylord@folsom.ca.us>; General Plan <generalplan@folsom.ca.us>

Subject: General Plan Mixed Use Overlay Proposal

Good Morning Scott,

The Mixed Use Overlay discussed at last night's meeting appears to carry some major traffic, population, and environmental implications for development, re-development, and infill projects along East Bidwell St., in the years ahead.

E-1

Last night's presenter indicated that the Mixed Use Overlay would allow current land owners flexibility to renovate and update existing commercial land. This statement appears to be incomplete and misleading in significant ways. Areas of contiguous Open Space near Blue Ravine have been included in the MU Overlay. The Mixed Used designation would allow "high density" (20 - 30 dwelling units per acre) development in these areas. Regardless of short term plans or expectations, I cannot fathom an acceptable reason to allow this. As I write this email, large portions of East Bidwell have been disrupted by flooding. Development impacts hydrology, evicts nature, and challenges coexistence. Please re-think any allowable modifications to these regions; remove the MU Overlay from Open Space areas.

E-3

E-2

The Mixed Use Overlay has also been drawn to cover areas zoned as "Multifamily Low Density", "Multifamily Medium Density," and several types of land use designations that don't presently allow any dwelling areas. Changes to such a vast area would expose one of our busiest traffic corridors to potentially large increases in dwelling unit counts. Why not start with a much smaller overlay in the areas that need renovation most to see what types of proposals come forward? When our City Council voted to allow a portion of the "Central Commercial District" at East Bidwell and Riley Streets to be re-designated as "Mixed Use" the project approved in that area brought 140 dwelling units. None of the press that covered this project even discussed the small number of ground-level offices that allowed this High Density project to qualify as "Mixed Use". Let's look closer at how the Mixed Use Overlay could potentially allow similar high-density development, and re-development.

E-4

For all parcels inside the Mixed Use Overlay area in our Draft General Plan, I would like to E-5 know the present-state, maximum allowable dwelling unit entitlements. This will illustrate where existing policy has "capped" new growth in this region. Please include (under)developed parcels. I'd like to know what the total maximum dwelling unit entitlements are, inside the Mixed Use Overlay area. Additionally, I'd like to know how many acres the Mixed Use Overlay area encompasses, to calculate the 30 dwelling-unit per acre maximum that will be allowed by this re-designation. The difference between these two numbers should illustrate the scope of growth that would be written into local policy. Is the Planning Department comfortable with this?

After I see these numbers, I would be open to sit and discuss some of the more detailed logic that brought about this proposed change. I understand that the MU Overlay intends to revitalize some key areas of our city; I encourage you to consider shrinking the overlay to encompass areas that will need revitalization first, so that our Commissions and Council can vet the earliest proposals as proofs-of-concepts for what may lie ahead.

Thank you for listening. And thank you for your time, attention, and work on behalf of our community.

Kevin Mallory

Folsom City Planning Commissioner

## Response to Letter E

Commenter Kevin Mallory March 22, 2018

E-1 This comment states that implementation of the East Bidwell Corridor mixed use overlay designation set forth in the 2035 General Plan could have future adverse effects on traffic, population, and other environmental issues.

The potential effects of implementing the 2035 General Plan, including the East Bidwell Corridor mixed use overlay designation have been comprehensively assessed in the Draft PEIR. For information regarding land use, population, and housing, refer to Chapter 4, *Land Use, Population, and Housing*, of the Draft PEIR. For a discussion of the scope of the Draft PEIR and other details of the environmental analysis, refer to PEIR Chapter 5, *Introduction to the Environmental Analysis*. For all other environmental issues, refer to Chapters 6 through 19, and 21 of the Draft PEIR.

The comment does not raise issues related to the adequacy of the information presented or environmental conclusions of the Draft PEIR. Because the comment does not raise questions regarding the Draft PEIR, no changes to the PEIR are necessary to respond.

E-2 The comment takes exception to those portions of City staff's summary of the 2035 General Plan related to the East Bidwell Corridor mixed use overlay designation at the public workshop held before the City of Folsom Planning Commission on March 21, 2018. No issues regarding the Draft PEIR are raised by the comment.

The comment raises policy issues and does not identify any issues related to the adequacy of the Draft PEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff's response to this comment will be included as an appendix to the staff report. Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

E-3 The comment states that intensified development encouraged by the East Bidwell Corridor mixed use overlay designation impacts hydrology and flooding. The comment urges that the City revised the boundaries of the East Bidwell Corridor mixed use overlay designation to avoid areas with an underlying General Plan land use designation of Open Space.

With respect to increased potential for flooding, the DPEIR evaluates this potential effect in Chapter 14, *Hydrology and Water Quality*, of the DPEIR. The comment does not raise issues related to the adequacy of the information presented or environmental conclusions of the Draft PEIR. Because the comment does not raise questions regarding the Draft PEIR, no changes to the PEIR are necessary to respond.

Regarding the comment's request that the boundaries of the East Bidwell Corridor mixed use overlay be modified to exclude areas with an underlying land use designation of Open Space, the comment raises policy issues and does not identify any issues related to the adequacy of the Draft PEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff's response to this comment will be included as an appendix to the staff report. Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

E-4 The comment notes that the East Bidwell Corridor mixed use overlay designation applies to areas designated for low density residential uses or other land uses that do not currently allow high density residential uses. The comment urges that City to substantially reduce the proposed boundaries of the East Bidwell Corridor mixed use overlay designation to provide for a test to establish the effects on urban development that the East Bidwell Corridor mixed use overlay designation might have. The comment points to an example of a recent project in the East Bidwell Corridor developed with a mix of land uses.

The comment raises policy issues and does not identify any issues related to the adequacy of the Draft PEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff's response to this comment will be included as an appendix to the staff report. Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

E-5 The comment requests information from City staff regarding the potential for increased development in areas designated for East Bidwell Corridor mixed uses to form the basis for potentially modifying the policies and boundaries of the overlay designation.

The comment raises policy issues and does not identify any issues related to the adequacy of the Draft PEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff's response to this comment will be included as an appendix to the staff report. Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

#### Letter F

From: Loretta Hettinger < loretta@shaunv.com>
Sent: Friday, April 20, 2018 10:17 AM
To: Scott Johnson < sjohnson@folsom.ca.us>
Cc: Pam Johns < pjohns@folsom.ca.us>
Subject: General Plan Program EIR Comments

Thank you for the opportunity to comment on the Draft Program EIR for the proposed General Plan.

1. The Summary of Environmental Impacts and Mitigation Measures on p. 2-2 states that no mitigation measures are available to reduce the impacts on cultural resources. However, the EIR/EIS for the FPASP includes mitigation measures that would seem readily adaptable to the entire City. The FPASP requires construction worker training to identify cultural resources that may be encountered in their work. Absent a requirement to have an archaeologist present on all construction sites, training of construction workers seems a reasonable alternative. It may not be economically feasible to train workers on all projects, but thresholds could be developed, and certainly City inspectors could be trained. Impacts still may not be reduced below a level of significance, but there is certainly the potential for a significant reduction.

F-1

F-3

- 2. Although the City has been very responsive. In improving the draft General Plan in respect to history, this PEIR again illustrates the City's deficiency in staff expertise regarding the field of history and preservation of cultural resources:
- a) The lists of cultural resources contain at least two significant errors. The Ashland Freight Station is cited as being on the National Register when it is not. The Natoma Ground Sluice Mining site is listed as both "undetermined" and "eligible for the National Register", and the same site is listed separately as "Chinese Diggings." Both of these sites are located on City property.
- b) The list of preparers has a significant omission. It includes the Planning Commission for the rest of the City but not its equivalent Planning Commission for the Historic District, the Historic District Commission.
- c) Despite Policy NCR 5.1.4, there are cultural resources identified by the City in the adopted Historic Preservation Master Plan (HPMP) that do not appear on the lists. (See p. 10-9, Table 10-1 and Appendix G.). The HDMP was not cited as a source for the PEIR. (See p. 10-15.). A separate letter on this topic will be provided.

Per your previous assurance that changes to the GP text will still be made, HPL continues to request changes previously submitted. We will provide an updated letter.

## Response to Letter F

Commenter Loretta Hettinger April 20, 2018

F-1 The comment suggests that a project specific mitigation measure adopted by the City of Folsom for the Folsom Plan Area Specific Plan that would require the training of construction workers to identify potential cultural resources be expanded to apply to new development in areas of the city north of Highway 50.

An important distinction between the FPASP area and the existing urbanized area north of Highway 50 is that the FPASP was proposed within an undeveloped area with a known possibility of encountering unknown cultural resources. In contrast, areas to be developed pursuant to the 2035 General Plan to the north of Highway 50 primarily consist of scattered parcels in various stages of development.

The DPEIR identified 453 total vacant parcels north of Highway 50 encompassing 441 acres. Of these 453 parcels, 377 are lots within existing developed or partially developed single-family residential subdivisions totaling 163 acres, with a gross median lot size of 16,125 square feet. Of the remaining 76 parcels, the majority are designated for commercial or multi-family uses. For these uses, the total acreage is 278 acres with a gross median parcel size of 37,150 square feet. As reported in the DPEIR, the 453 parcels were evaluated using aerial photographs to determine their condition. As evidenced on the aerial photographs, the overwhelming majority of both the single-family residential and Commercial/Multi-family residential parcels are remnant areas within subdivisions or larger development projects, and most have been disturbed by prior rough grading and/or the construction of roads and utilities. Future development of the majority of the 453 parcels would proceed as a matter of right, without any further discretionary review by the City. However, in many cases, prior environmental review had been completed and mitigation imposed where appropriate. For those parcels where future discretionary review would be required by the City, compliance with the environmental review requirements of CEQA would also be required, which would permit the City to impose mitigation similar to that proposed in the comment where appropriate.

Because the City has procedures in place to impose the suggested measure where necessary and appropriate, the City declines to implement the proposed requirement as a generally applicable City standard. Denial of this suggested mitigation would not change the environmental information and conclusion set forth in the DPEIR. No modification of the DPEIR is needed to respond to this comment.

F-2 The comment (2.a) notes that the City has made significant errors in listing the status of several resources within the City: 1. the Ashland Depot); and 2., the Natoma Ground Sluice Mining site and the Chinese Diggings.

Pursuant to the comment and based on a review of prior City descriptions of the Natoma Gound Sluice Mining/Chinese Diggings site (Folsom 2005), the City has revised Table 10-1 of the DPEIR. See Chapter 4 of the Final PEIR. The modification of Table 10-1 makes a minor

- correction to the Table, and would not change the environmental information and conclusion set forth in the DPEIR. Therefore, no additional modification of the DPEIR is needed to respond to this comment.
- F-3 The comment states that DPEIR Chapter 22, *List of Preparers*, omits the Historic District Commission from the cited preparers.
  - Chapter 22, Section 22.1 is hereby amended to include the Historic District Commission. See Chapter 4 of the Final PEIR. The modification of Section 22.1 makes a minor correction to the DPEIR, and would not change any environmental information or conclusions set forth in the DPEIR. Therefore, no additional modification of the DPEIR is needed to respond to this comment.
- F-4 The comment notes that DPEIR Table 10-1 does not contain all of the resources listed in the City's Historic Preservation Master Plan. The comment states that additional information will be provided regarding this issue.
  - Since no further information has been provided, the City is unable to respond to this comment. Nonetheless, cultural sites listed in the Historic Preservation Master Plan are known to the City and evaluated in the City's review of proposed urban development projects where appropriate. Therefore, the addition of cultural sites to Table 10-1 sourced from the Historic Preservation Master Plan would not change any environmental information or conclusions set forth in the DPEIR. Therefore, no additional modification of the DPEIR is needed to respond to this comment.
- F-5 The comment notes that the Heritage Preservation League stands by its previous comments submitted on the text of the draft 2035 General Plan, and that additional information regarding these requests will be submitted.
  - The comment raises policy issues and does not identify any issues related to the adequacy of the DPEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration. Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

Letter G
From: LJ Laurent [mailto:ljlaurent@att.net]

Sent: Friday, April 13, 2018 9:41 AM

**To:** Christa Freemantle

Cc: David G. Ray; David Murillo; CA SP Counsel Tara Lynch; Richard Preston; Drew Lessard

Subject: PRA Request, General Plan Update and Comment

To: Folsom City Clerk C. Freemantle

From: Laurette Laurent

April 13, 2018

Public Records Request/ Comment General Plan Update (comment period ending April 20, 2018.

PRA Request: Copies of all letters/notifications/emails sent to federal and state agencies (partners in the Folsom Lake SRA/USBR Conservation Zones; parties to Managing Partners Contract for all federal assets American River)

Contract parties are USBR Reclamation; California State Parks. Time period May 1, 2017 thru today's date.

Copies of all correspondence/phone messages/ emails between USBR and/or CA State Parks with regard to Folsom General Plan Update. Same with regard to "Folsom river district" zoning of federal assets/State Park for the period May 1, 2017 through present date.

If no such documents, emails, messages exist, please respond stating such.

Thank you.

Please enter this PRA Request and following comment in General Plan Update files:

It is outrageous the city of Folsom would unilaterally publish "CEOA Notices", advertisements of private/commercial meetings posing as Public Hearings, without following the mandatory laws governing the Federal Zoning and General Plan laws for American River assets; and CEQA laws governing Notice(s).

To call federal waters/land "Folsom's waterfront" approaches insanity from a planning point of view, because all these protected assets are legally zoned Conservation Zone, and otherwise passive usage, by the federal government.

To willfully ignore sunshine laws (both federal & state of California) in G-4 this "GP Update" is egregiously improper. To willfully ignore Geotechnical Reports indicating the instability of LAR Cliffs, hydraulically mined slopes; dredged rock piles, location directly below a major dam -- to propose dense urban-only usages for this area below the dams is negligence. What CA Licensed Engineer certified such massive uses as arena, commercial usages, parking, etc.?

http://www.folsom.ca.us/civicax/filebank/blobdload.aspx?blobid=32580 http://www.ceqanet.ca.gov/ProjDocList.asp?ProjectPK=657022

G-2

G-1

G-3

## Response to Letter G

Commenter Laurette Laurent April 13, 2018

G-1 The comment is a Public Records Act (PRA) request for documents pertaining to communications between the City of Folsom and State and Federal land management agencies with management authority over the Folsom Lake State Recreation Area/Folsom Powerhouse State Historic Park (FLSRA/FPSHP) regarding the proposed River District as set forth in the 2035 General Plan.

The comment is a request for public records. The City of Folsom submitted documents as requested. The comment does not identify any issues related to the adequacy of the Draft PEIR, and no further response is necessary under CEQA. Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

G-2 The comment calls for the City to enter the PRA request cited in Comment G-1 into the City's records pertaining to preparation of the 2035 General Plan. The comment notes unspecified violation of Federal and State laws regarding noticing.

The comment raises policy issues and does not identify any issues related to the adequacy of the Draft PEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration. Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

G-3 The comment states that City planning efforts related to the River District ignore State and Federal ownership and management of lands within the FLSRA.

State and Federal facilities, ownership, and management plans and authority are discussed in Chapter 16, *Public Services and Recreation Resources*, Sections 16.1.1 and 16.1.2 of the Draft PEIR. Impact PSR-4 identifies a significant impact to State and Federal recreation resources with implementation of the 2035 General Plan associated with the River District. The DPEIR identifies a series of mitigation measures consisting of modifications of policies and the 2035 General Plan Land Use diagram. The DPEIR concludes that the potential impact would be reduced to a less-than-significant level with implementation of the identified mitigation measures.

The comment does not identify any issues related to the adequacy of the information or environmental conclusions with respect to the River District as discussed and evaluated in the Draft PEIR, and no further response is necessary under CEQA. Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

G-4 The comment states that a number of geologic and flood hazards exist in the area of the proposed River District. The comment additionally notes that the existence of these hazards renders the River District unfit for urban development.

The indirect impacts of geologic hazards within the 2035 Plan Evaluation area, including the River District, are assessed in Chapter 11, *Geology, Soils, and Mineral Resources*, of the DPEIR. Flood hazards within this area are evaluated in Draft PEIR, Chapter 14, *Hydrology and Water Quality*. The comment does not identify any issues related to the adequacy of the information or environmental conclusions with respect to geologic or flood hazards as presented in the Draft PEIR, and no further response is necessary under CEQA. Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

## Letter H

From: barbaraleary@comcast.net <barbaraleary@comcast.net> Sent: Friday, April 20, 2018 5:00 PM

To: Scott Johnson <sjohnson@folsom.ca.us> Subject: Re: DEIR

I want to add a comment to the DEIR for the 2035 Master Plan regarding the River District. In light of the fact the Bureau of Reclamation and state parks currently own and manage the defined area it is inappropriate for the City to extend zoning or planning recommendations into three general plan. Cooperative future efforts may be in order only.

H-1

Barbara Leary

## Response to Letter H

Commenter Barbara Leary April 20, 2018

H-1 The comment states that City planning efforts in the 2035 General Plan related to the River District are inappropriate given State and Federal ownership and management of lands within the FLSRA/FPSHP.

State and Federal facilities, ownership, and management plans and authority are discussed in Chapter 16, *Public Services and Recreation Resources*, Sections 16.1.1 and 16.1.2 of the Draft PEIR. Impact PSR-4 identifies a significant impact to State and Federal recreation resources with implementation of the 2035 General Plan associated with the River District. The DPEIR identifies a series of mitigation measures consisting of modifications of policies and the 2035 General Plan Land Use diagram. The DPEIR concludes that the potential impact would be reduced to less than significant with implementation of the identified mitigation measures.

The comment does not identify any issues related to the adequacy of the information or environmental conclusions with respect to the River District as discussed and evaluated in the Draft PEIR, and no further response is necessary under CEQA. Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

#### Letter I

April 16, 2018

Mr. Scott Johnson Planning Manager 50 Natoma St Folsom CA, 95630

RE: Folsom 2035 General Plan and EIR

# **Greetings Scott:**

Thank you for the opportunity to review and comment on the Folsom 2035 General Plan and affiliated DEIR. The General Plan is the most important document the City and I am happy to see the City doing a comprehensive update.

City staff should be commended for the hard work which resulted in the General Plan and EIR. There are many good goals, policies and objectives in the General Plan and the City will be better for it.

As I have commented previously, the General Plan has several worthy policies, however, leaves room for improvement. My comments relate to both the General Plan and EIR and the anticipated impacts identified in the EIR. In particular, I have serious concerns primarily with Planning Area 2 and its associated impacts as described below:

## 1. Planning Area 2

Planning Area 2 is a large area of land south of the City Limits which is included in the General Plan Project Area. According to the DEIR:

Planning Area 2 is an approximately 3,700-acre area outside the city limits and Sphere of Influence, and within unincorporated Sacramento County. This area comprises a portion of the City's designated Area of Concern, adopted by the Sacramento LAFCo in July 1996 (LAFCo 1996). Planning Area 2 largely consists of grazing land, but also includes gravel quarries and a portion of the Prairie City State Vehicular Recreation Area. The Sacramento County 2030 General Plan designates this area as General Agriculture.

The EIR states, "Folsom 2035 General Plan does not assign land uses or specific policies to either of these two Planning Areas". Although the General Plan does not assign land uses or specific policies to Planning Area 2, the inclusion in the General Plan opens the door to future policies and interpretations that can and have historically resulted in urban sprawl and the affiliated environmental impacts.

The EIR notes the inconsistency of Planning Area 2 with SACOG's MTP/SCS. Further SACOG recognized these inconsistencies and in response to the NOP suggested "that the City include strong policies in the 2035 General Plan on the timing and conditions that must be met before new growth can occur in this area as well as polices that require phased growth in the area". Although the EIR notes the "City will consider the policy requests of SACOG in its review and processing of the 2035 General Plan" these

I-1

I-2

issues were in fact not addressed. The EIR should be revised to evaluate the land use impacts of being inconsistent with SACOG's MTP/SCS and the potential impacts of opening the door to more development south of Highway 50.

**I-4** 

The EIR fails to address the potential impact of urban growth within the General Plan Planning Area 2. In fact, as described later in this letter, the EIR (and the EIR for the Southeast Connector) admits there is the potential for additional growth pressures in this area. Substantial evidence exists (See SACOG MTP -Chapter 5b) which demonstrates sprawl (development along the periphery of the City) leads to increased VMT, increased GHG's and decreased air quality the City should disclose the potential impacts of this planning area to the residents of Folsom.

I-5

## Planning Area 2 as a Red Herrina

**I-6** 

In past hearings, some councilmembers have voiced the importance of Planning Area 2 is to ostensibly protect this area from the development pressures of Sacramento County. This is a red herring for enabling Folsom to continue to expand and sprawl outward. The Sacramento County General Plan specifically prohibits General Plan Amendments (which would allow more intensive development):

AG-2. The County shall not accept applications for General Plan amendments outside the Urban Services Boundary (USB) redesignating prime, statewide importance, unique and local importance farmlands or lands with intensive agricultural investments to agricultural/residential or urban use (i.e., residential, commercial, industrial) unless the applicant demonstrates that the request is consistent with the General Plan Agriculture-Residential expansion policies (please refer to Land Use Element Policies regarding Agriculture-Residential uses).

This policy ensures that the likelihood of Sacramento County actually developing in Planning Area 2 is very unlikely. The area south of Whiterock Road is outside both the Urban Services Boundary and the Urban Policy Area for Sacramento County which means that for at least the horizon of the County General Plan, they do not envision any change from the current land uses. The City should advocate for this area to remain open space in perpetuity creating an aesthetic and agricultural buffer from other development pressures.

I-7 As the SACOG comment letter from the NOP stipulates - the MTP/SCS identifies that the land shown in

### Planning Area 2 is inconsistent with the MTP/SCS

Planning Area 2 will be vacant until at least 2050. Given the planning horizon for the General Plan is 2035, there is absolutely no need for the planning area. In fact the most accurate statement in the EIR related to Planning Area 2 is that its elimination via Alternative 2 "could reduce the potential that urban development could occur in Planning Area 2 prior to the year 2050 as established by the Blueprint Preferred Scenario adopted by SACOG."

The inclusion of Planning Area 2 is inconsistent with the goals, policies and objectives of the General Plan creating internal inconsistencies within the General Plan. For example:

Policy NCR 3.2.3: Greenhouse Gas Reduction in New Development. Reduce greenhouse gas emissions from new development by encouraging development that lowers vehicle miles traveled (VMT), and discouraging auto-dependent sprawl and dependence on the private automobile; promoting development that is compact, mixed-use, pedestrian friendly, and transit oriented; promoting energy-efficient building design and site planning; improving the jobs/housing ratio; and other methods of reducing emissions while maintaining the balance of housing types Folsom is known for.

I-7

The inclusion of Planning Area 2 without growth control measures or policies to strongly discourage urban sprawl is contrary to this goal. Urban development on the fringes of suburbia are proven to increase VMT and increase GHGs. For example, according to SACOG the VMT per capita in the areas west and south of Blue Ravine exceed 17.96 VMT per capita per day (2012 Data – SACOG ATP Mapping site) whereas the older less sprawling neighborhoods west of Blue Ravine range from 15.27 – 17.95 VMT Per Capita Per day. At the same time the SCS/MTP is anticipating a drop in the regional VMT per capita which is likely why SACOG is concerned with the proposed Planning Area 2. The data shows that the further you build neighborhoods away from the center of town (such as Planning Area 2), the higher VMT will result. This conflicts with several General Plan Policies and exacerbates impacts for Air Quality, Traffic, GHG's as identified in the EIR.

Given the number of impacts and issues raised by Planning Area 2, there are significant issues than are required to be analyzed under CEQA necessitating the revision of the General Plan, the revision/recirculation of the EIR and much more work to fully enable decision makers to understand the impacts with Planning Area 2. The purported benefits of Planning Area 2 are extremely limited and based on false information and greatly outweighed by the potential impacts. As a result the City should remove Planning Area 2 from the General Plan as outlined in Alternative 2 of the EIR.

1-8

2. The DEIR Improperly attempts to avoid Analysis and Mitigation of the General Plan's impacts by concluding that they are Significant and Unavoidable.

I-9

For both Agricultural Impacts and Aesthetic Impacts, the EIR concludes there are significant and unavoidable impacts for the project. The EIR fails to identify mitigation that mitigates these impact areas (primarily Agricultural Impacts and Aesthetic Impacts as described below).

CEQA provides that "public agencies should not approve projects as proposed if there are feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects." (Pub. Resources Code, § 21002; see also id. at § 21002.1, subd. (b) [agencies must mitigate significant effects of projects they approve "whenever it is feasible to do so"].)

CEQA also defines "feasible" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." (Guidelines, § 15364.) By simply calling an impact Significant and Unavoidable does not relieve the City of its duty to mitigate these impacts. There are feasible mitigation measures in to reduce the impact on these resources.

Agricultural Impacts

I-10

As described in the Agricultural and Forestry section of the EIR (Impact AG-1), the project has significant impacts on Agricultural Lands as it can result in loss of Williamson Act contracted land south of the FPASP. This includes the land in Planning Area 2. The EIR considers this a significant and unavoidable impact, stating:

I-10

Feasible mitigation measures, such as participation in an agricultural conservation easement, are not available to reduce impacts associated with the cancellation of these Williamson Act contracts to a less-than-significant level because no such programs are available. Therefore, this impact remains significant and unavoidable.

This conclusion in the DEIR for AG-1 is not based on substantial evidence. On the contrary, agricultural easements, open space buffers, and affiliated mitigation measures can greatly reduce the impact on agricultural resources as described below:

## Feasible Agricultural Mitigation to minimize effects of General Plan

There are feasible mitigation which can result in less pressure on surrounding agricultural lands. For example, if the City could adopt policies with the General Plan that establish an agricultural green belt or urban growth boundary around the southern portion of the City. This in turn buffers the urban area from agricultural areas thereby mitigating the indirect impacts of Williamson Act withdrawals for nearby agricultural lands.

In fact the California Department of Conservation recommends the California Council of Land Trusts Farmland Mitigation Guidebook for agencies interested in establishing and administering farm land mitigation. Numerous case studies are cited in the Farmland Mitigation Guidebook including locally relevant examples. For example, Stanislaus County developed a Farmland Mitigation Program requirement that all farmland converted shall be replaced at a 1:1 ratio (this program was adopted in conjunction with a General Plan Update). See Building Industry Association of Central California v. County of Stanislaus et al. (2010) 190 Cal.App.4th 582

Similarly, the City of Elk Grove initiated the following policy:

At the time of submittal of any application to annex territory within the Sphere of Influence Amendment (SOIA) Area, the City of Elk Grove will identify lands to be set aside in permanent conservation easements at a ratio of one open space acre converted to urban land uses to one-half open space acre preserved and at a ratio of one agriculture acre converted to urban land uses to one-half agriculture acre preserved. Stacking of mitigation values will be permitted in order to serve multiple overlapping conservation purposes. The total acres of land conserved will be based on the total onsite open space and agriculture acreage converted to urban uses. Conserved open space and agriculture areas may include areas on the project site, lands secured for permanent habitat enhancement (e.g., giant garter snake, Swainson's hawk habitat), or additional land identified by the City. (Sacramento Local Agency Formation Commission Proposed City of Elk Grove Sphere of Influence Amendment (LAFC # 09-10) Draft EIR)

In addition, Yolo County has an Agricultural Conservation and Mitigation Program (Section 8-2.404). This Program states:

Agricultural mitigation shall be required for conversion or change from agricultural use to a predominantly non-agricultural use prior to, or concurrent with, approval of a zone change from agricultural to urban zoning, permit, or other discretionary or ministerial approval by the County.

I-10

Except as provided in subsection (d)(2) below, relating to adjustment factors, for projects that convert prime farmland, a minimum of three (3) acres of agricultural land shall be preserved in the locations specified in subsection (d)(1) for each acre of agricultural land changed to a predominantly non-agricultural use or zoning classification (3:1 ratio). For projects that convert non-prime farmland, a minimum of two (2) acres of agricultural land shall be preserved in the locations specified in subsection (d)(1) for each acre of land changed to a predominantly non-agricultural use or zoning classification (2:1) ratio. Projects that convert a mix of prime and non-prime lands shall mitigate at a blended ratio that reflects for the percentage mix of converted prime and non-prime lands within project site boundaries.

Further, the use of Agricultural Conservation Easements (ACEs) is a common tool to mitigate the potential impact to farmland. In fact, in Masonite Corporation v. County Of Mendocino (Masonite Corporation Dist. v. County of Mendocino, et al (7/25/13, First Dist., Div. 3) 218 Cal.App.4th 230) the court concluded that "ACEs may appropriately mitigate for the direct loss (and the County had already determined ACEs can mitigate indirect losses) of farmland when a project converts agricultural land to a nonagricultural use, even though an ACE does not replace the onsite resources". This conclusion "was reinforced by the CEQA Guidelines, case law on offsite mitigation for loss of biological resources, case law on ACEs, prevailing practice, and the public policy of this state."

Policies such as the Yolo County or Elk Grove examples above can help to ensure that General Plan will mitigate impacts on agricultural land within Planning Area 2, the Folsom Plan Area or other future expansions into agricultural land surrounding the City. Although the City will likely adopt a Statement of Overriding Considerations related to Agricultural Impacts (and aesthetic impacts), CEQA mandates mitigation to the greatest extent feasible. These examples represent feasible mitigation measures to ensure impacts are reduced to these important resources — resources that the community values and have largely been ignored by the EIR and the General Plan. The EIR should evaluate these mitigation measures to lessen the impacts on Agricultural Resources and Aesthetic Impacts.

#### **Cumulative Agricultural Impacts**

An EIR must discuss significant cumulative impacts resulting from the project. CEQA Guidelines §15130(a). Cumulative impacts are defined as two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. CEQA Guidelines § 15355(a). "[I]ndividual effects may be changes resulting from a single project or a number of separate projects. CEQA Guidelines § 15355(a).

A legally adequate cumulative impacts analysis views a particular project over time and in conjunction with other related past, present, and reasonably foreseeable future projects whose impacts might compound or interrelate with those of the project at hand. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time. CEQA Guidelines § 15355(b). The cumulative impacts concept recognizes that "[t]he full environmental impact of a proposed ... action cannot be gauged in a vacuum." Whitman v. Board of Supervisors, 88 Cal. App. 3d 397,408 (1979).

The EIR's discussion of cumulative impacts to agriculture is merely cursory and conclusory. The DEIR fails to analyze the General Plan's effects on agriculture together with the effects of past, present, and future development projects. Instead, it simply concludes that because the Project will contribute to loss of agricultural land in Sacramento County generally, the cumulative impacts are significant. The EIR must be revised to include a proper cumulative analysis for agricultural resources. As regard to the cumulative analysis, the EIR preparers must examine the combined effects of both the proposed General Plan and other identified projects throughout the Sacramento region. The EIR, as discussed previously, is also required to mitigate the cumulative impacts to agriculture.

I-11

#### **Aesthetic Impacts**

I-12

Similar to Impact AG-2, AES-1 fails to consider feasible mitigation to minimize the impacts of future development on the City's aesthetic resources. The EIR considers this a significant and unavoidable impact but does little to mitigate the potential impact as required under CEQA. Similar to agricultural impacts there are feasible mitigation measures to minimize or reduce the impact of new development on aesthetics, particularly the impact on the rolling hills and grazing land. The DEIR states there are no available mitigation measures to help mitigate the impact. However, the EIR is obligated to minimize the impacts through feasible mitigation measures. Similar to AG-2 there are examples of mitigation measures that do in fact minimize the aesthetic impacts (Adapted from Santa Barbara County Bradley Village (Key Site 30) SEIR:

Concurrently with the adoption of the Folsom General Plan, the City shall adopt an Open Space Overlay for the southern portion of the City to provide for the protection of contiguous bands of open space within the area south of White Rock Road. The purpose and intent of this overlay shall be to provide for long term protection of contiguous bands of public and private open space. This overlay system shall be designed to protect the community's most scenic natural resources and landforms, including oak, hillsides, ridgelines and significant windrows.

As part of adoption of the Open Space Overlay, the City shall adopt a unified open space plan for the general location and intensity of allowable uses within the open space overlay. The open space plan shall set standards for protection of significant natural resources, for provision of active and passive recreation and for the mitigation of the aesthetic impacts from development adjacent to designated open space areas.

Although this mitigation will not fully reduce the aesthetic impact (or cumulative aesthetic impact) of sprawl on the agricultural land south of Highway 50, it can help mitigate the effects of the aesthetic impacts, which is required by CEQA "whenever it is feasible to do so". Clearly this approach has worked for other agencies and there is no reason it could not be incorporated in the Draft General Plan or EIR.

### 3. Traffic/Circulation

I-13

I applaud the City's recognition that the current LOS standard of C is destined for failure and the City simply cannot afford to maintain a LOS C as its standard without considerable financial impact and

impacts to active transportation and the environment. Further, the General Plan does a great job on expanding Transit Oriented Development opportunities at our woefully undeveloped light rail stations.

I-13

On the other hand the City continues to prioritize the Single-occupancy vehicles as the primary source of transportation. The EIR recognizes that 52% of GHG's are generated by transportation (Figure 12-1), however, the General Plan still favors auto-centric polices and promotes urban sprawl through inclusion of Planning Area 2. By the City's inclusion of Area 2 in the General Plan you are contradicting the VMT and GHG reduction polices in the General Plan. Without stronger policies capable of significant shift in travel modes, the City will be unable to achieve the GHG emission reductions and VMT reductions while continuing to support additional infill development.

I-14

The current transit system is not frequent enough nor convenient enough to garner the kind of ridership that can result in decreased traffic, decreased VMT and decreased GHG's. The fact that the General Plan does not consider a significant investment into transit service that is convenient and efficient demonstrates the City is not serious about reductions in VMT and GHGs. In particular, with the advent of S50 developments and the intensification of uses along East Bidwell, transit with 15 minute headways and access to key destinations should be playing a key role into solving the City's traffic issues and affiliated impacts.

I-15

The City should set targets for each mode of transportation within the General Plan and then tie those targets to specific reductions in GHGs and VMT. Those targets should include funding necessary to achieve those targets and thereby the City's goals. Further, the City should include a policy that ensures new developments contribute to the impact on the City's existing transportation network including all modes of transportation (bike/ped/ transit). These fees should be used throughout the City's entire network (not just adjacent to new development) to implement transit connections and improving walking and biking throughout the City and calming traffic creating a higher likelihood for a significant share of the population to walk and bike in Folsom for commute, school, or shopping purposes.

I-16

#### 4. Greenhouse Gas Emissions

I-17

Despite the fact that transportation related GHG's represent 52% of the City's inventory of GHGs, neither the General Plan nor the mitigation measures adequately address this impact. The EIR considers this significant and unavoidable; however, a meaningful effort to transform the City from a single occupancy vehicle focus to more of a smart growth approach is minimized. This represents an internal conflict within the General Plan which seeks to reduce VMT and GHG's while at the same time opening the door (through Planning Area 2) to more potential development on the periphery of the City. CEQA requires that agencies formally commit to doing everything that is technically, legally, and economically feasible to lessen or avoid the substantial environmental effects that will result from projects they approve. The DEIR fails to propose and evaluate all feasible mitigation measures to lessen the General Plan's impact on the environment and does not give reasonable consideration to alternative project designs, such as an increased transit focus which could avoid or reduce some of the environmental damage proposed by the Plan. Some of those alternatives could also provide long-term jobs, access to employment, and other sustainable economic and social benefits.

I-18

The City's assertion that Impact GHG-2 has the potential to conflict with long-term statewide GHG emissions reduction goals for 2050 is not based on substantial evidence and does not mitigate significant effects "whenever it is feasible to do so". In particular, a substantial portion of the City's

GHG's related to transportation are associated with single occupancy vehicle travel to places of employment west of Folsom such as Rancho Cordova and the City of Sacramento. Very few policies in the General Plan address this ongoing issue and therefore do not meaningfully mitigate the GHG's affiliated with the Draft General Plan.

I-18

For example the City should consider the benefits of investment in transit improvements to the eastern portions of the City to reduce VMT as substantial evidence exists that transit improvements can reduce VMT and GHG's. As described by the Strategic Growth Council, "A recent study of the opening of the Expo Line in Los Angeles provides some of the most direct evidence available of the impact of transit investments on VMT (Spears, et al. 2016). This study, which measured VMT for households living near the new light-rail line before and after the opening of the line, found that households living within 1 mile of a new Expo station drove almost 11 miles less per day because of the new line 18 months after its opening." This demonstrates that significant investment in transit can result in significant decline in VMT and GHG's and improved Air Quality and potentially reach the 2050 targets.

I-19

Other policy options exist to help the City achieve the 2050 targets. Sources such as the CAPCOA "Quantifying Greenhouse Gas Mitigation Measures" (available <a href="http://www.capcoa.org/">http://www.capcoa.org/</a>) offers dozens of GHG reductions that result in GHG reductions possibly enabling the City to achieve its GHG reductions thru 2050. For example the following mitigation measures are feasible options for the City to incorporate into the General Plan (or expand upon what is proposed to achieve greater GHG emissions reductions):

I-20

CAPCOA Measure	Strategy	Range of Effectiveness (Percent Reduction in GHG Emissions)			
TST-3	Expand Transit Network	0.1 - 8.2%			
TST-4	Increase Transit Frequency/Speed	0.02- 2.5% 0.02-2.5%			
TST-1	Provide Bust Rapid Transit				
LUT-5	Increase Transit Accessibility	0.5-24.6%			
LUT-4	Increase Destination Accessibility	6.7-20%			
TRT-4	Implement Subsidized or Discount Transit Program	0.3-20%			
TRT-10	Implement School Pool Program	0.3-13.4%			
TRT-1	Implement Commute Trip Reduction Programs	1.0-6.2%			

In total, just the eight measures listed above could potentially result in the necessary reductions to comply with the 2050 targets. The City should revise the General Plan and EIR to put an increased focus on transit and decreased focus on Single Occupancy Vehicles to meet the States GHG reduction goals.

#### 5. Noise

The EIR discusses the impacts of traffic noise on future development; however, does not consider the impact of ongoing noise issues on residential uses introduced into commercial areas. For example, the General Plan enables mixed use development along the East Bidwell corridor (which is a good thing). Unfortunately this creates a problem where sensitive residential users are introduced to areas adjacent to commercial areas. For Example, in the recent Bidwell Pointe Mixed Use Project, the residential portion of the project is immediately adjacent to the Dimple Records Center (313 E Bidwell). According to the US EPA, "Inadequately controlled noise presents a growing danger to the

health and welfare of the Nation's population, particularly in urban areas. The major sources of noise include transportation vehicles and equipment, machinery, appliances, and other products in commerce".

I-21

Historically, along the East Bidwell Corridor, ongoing landscape maintenance (leaf blowers and vacuum trucks in parking lots) occurs after 10PM (including at 313 E Bidwell). The introduction of sensitive uses in proximity to this activity represents a potentially significant impact as the interiors and exteriors of buildings will not meet the standards within the General Plan or the Municipal Code. According to the EIR, the maximum Ldn/CNEL, dB is 60 dB for Low Density and 65 for multifamily properties and 45 dBA indoor. Also, the EIR notes a Gas lawn mower, 30 meters away (100 feet) operates at 70 dBA. Given that future development (as evidenced through Bidwell Pointe) will be less than 50' away from areas being maintained by leaf blowers noise at night noise levels from ongoing night time maintenance will exceed 70dBA at the exterior of sensitive receptors. Further, interior noise levels are likely to exceed the maximum allowable level of 45dbA as standard construction practices typically only mitigate 20-25dBA. This will likely result in significant impacts on new development from ongoing night time maintenance practices.

As a result, the General Plan and EIR should include an evaluation of the potential impacts of maintenance equipment such as leaf blowers (used after 10PM) on new (and existing) development likely to occur adjacent to sensitive uses. Likely a new General Plan Policy or mitigation measure to amend the City's noise ordinance to address this ongoing issue (to ban the use of leaf blowers between 10 AM and 7AM) could mitigate the impact to less than significant levels.

## 6. Growth Inducing Impacts

The DEIR states, "A project can induce growth by lowering or removing infrastructure barriers to growth, improving transportation access to an area, introducing a new use into an area, or by creating an amenity such as tourist-oriented facilities that attract new population or economic activity." Simply by including Planning Area 2 in the General Plan is the first step in incorporating Planning Area 2 into the City's Planning documents. Normally, this would be a huge barrier for a landowner to accomplish and it would require a CEQA evaluation on its own. This barrier is being eliminated by the fact that the City is including it in the General Plan (although not adequately discussing the potential impacts). The City already has advocated strongly and provided funding for the adjacent Capital Southeast Connector project. Cumulatively, these two actions are removing infrastructure barriers and improving transportation access to an area that is otherwise agricultural with the potential to induce growth.

In addition, the DEIR is internally inconsistent when it comes to Growth inducing impacts. On one hand the DEIR states the project will not induce growth but elsewhere in the DEIR it states, "Deletion of Planning Area 2 from the 2035 General Plan Land Use Diagram could reduce the potential that urban development could occur in Planning Area 2 prior to the year 2050 as established by the Blueprint Preferred Scenario adopted by SACOG."

The language "reduce the potential that urban development could occur" insinuates that growth could occur, reaffirming the fact that Planning Area 2 can lead to growth inducement (and other environmental impacts) which should be considered in the DEIR.

I-22

## Additionally the EIR states,

However, implementation of the 2035 General Plan could conflict with existing Williamson Act provisions on adjacent lands, and could result in subsequent contract non-renewals through requests for general plan amendments and rezoning of lands south of White Rock Road in unincorporated Sacramento County. Consequently, implementation of the 2035 Draft General Plan would result in a cumulatively considerable contribution to this significant cumulative impact. (Page 21-5). (Emphasis added)

This statement is contrary to the conclusion (Page 4-16) that the plan will not be growth inducing. The approval of the plan will lead to growth, mostly south of Highway 50. Although Planning Area 2 would maintain existing land use designations and zoning and would not directly result on the construction of new homes, businesses, roads, or utilities, the recently adopted Folsom Plan Area will result in additional pressure and growth inducing impacts.

The inclusion of vacant land in Planning Area 2 with direct access to the Southeast Connector Project, on land largely owned by one of the region's most prolific developer families, will place pressure on adjacent areas to seek development entitlements or annexation applications.

This is further evidenced in the findings for the Southeast Connector Project EIR which provides direct access to Planning Area 2 and the Folsom Plan Area:

... the result of the project will be to reduce congestion and provide better transportation conditions and easier access to areas currently served by the existing roadways. To the extent that the project will increase roadway capacity, it will remove obstacles to growth. Further, this will increase growth pressure on areas near the Connector's interchanges that are not currently planned for development. (Capital SouthEast Connector Expressway Statement of Overriding Consideration, p. 73).

This Connector Project EIR, adopted by the Joint Powers Authority, (which the City of Folsom is a member), concludes that the roadway alone with result in growth inducement. The cumulative effect of the Southeast Connector Project, the Folsom Plan Area, and Area 2 will result in new growth pressures on the periphery of the City which is contrary to the goals and objectives of the General Plan related to VMT, GHGs and Air Quality. The City has the ability to mitigate this impact by adopting a policy to not allow any new access to the SouthEast Connector, designation of an open space or agricultural buffer or other mitigation discussed above to minimize this effect. As a result, the Growth Inducing Impacts Analysis is inadequate and should be revised.

Finally the General Plan includes Policy M4.13, which proposes to reduce the LOS standards for existing roadways in the City to LOS D. Although this is a good policy, presumably to help with infill development, it also eliminates an existing barrier for new green field development. By lowering the threshold for traffic on existing roadways, new projects outside the City have a lower threshold they are required to meet resulting in more VMT and more GHG's. This can induce growth by allowing further development on the periphery of the City as the LOS reduction "frees up" capacity to allow further traffic on the City's network of roads. This impact should be discussed and considered by the EIR.

Preferably, the City should eliminate Planning Area 2 from the General Plan (as specified in Alternative 2) and adopt mitigations for Aesthetics and Agriculture which may avoid the need to recirculate the EIR.

I-23

#### Conclusion

The General Plan is a small step in the right direction; however, as described above has internal inconsistencies and leads to increased development pressure on the periphery of the City. I have offered feasible mitigation measures to reduce some of this impact, but the City should seriously consider a renewed focus on transit, infill development and redevelopment before it opens the door to more development on the fringes.

I-24

Thank you for your consideration of these comments. I look forward to seeing positive changes as the City continues to evolve into the future. My hope is that Folsom choses to grow sustainably (both fiscally and environmentally) and hope Folsom does not open the door to further sprawl southward. Please let me know if you have any questions or would like to discuss further.

Sincerely,

Casey Kempenaar

## Response to Letter I

Commenter Casey Kempenaar April 20, 2018

I-1 This is an introductory statement that states a general concern with the identification of Planning Area 2, an area south of White Rock Road, within the 2035 General Plan Planning Area.

No response is necessary. For discussions regarding specific environmental topics and analyses related to Planning Area 2, see responses to comments I-2 through I-23.

I - 2 The comment quotes the DPEIR and describes Planning Area 2 as a 3,700-acre area south of White Rock Road included within the 2035 General Plan's planning area.

The comment accurately describes Planning Area 2. The comment does not identify any issues related to the adequacy of the information or environmental conclusions with respect to this issue as presented in the Draft PEIR, and no further response is necessary under CEQA. Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

I-3 The comment states that, even though the 2035 General Plan assigns no land uses to Planning Area 2 nor proposes any policies that apply to Planning Area 2, the inclusion of Planning Area 2 within the 2035 General Plan planning area could result in future urban development south of White Rock Road.

The major point of this comment is that, given the inclusion of Planning Area 2 within the 2035 General Plan's planning area, future City of Folsom City Councils <u>could</u> act to encourage or permit urban development within Planning Area 2. In evaluating this contention, several CEQA requirements apply<sup>1</sup>: 1) Whether the project is a logical part of a chain of contemplated actions; and/or 2) Whether identifying future actions of the Folsom City Council would be speculative.

### Actions Contemplated by the 2035 General Plan and PEIR

DPEIR Chapter 3, *Project Description*, describes the project to be assessed in the EIR. Section 3.1, *Introduction*, summarily defines the 2035 General Plan:

The project analyzed in this Draft Program Environmental Impact Report (PEIR) is the proposed Folsom General Plan 2035 (2035 General Plan), which consists of a comprehensive update of the City's current General Plan, including the continuation of many existing policies, the modification of others, and the addition of new policies. ... The 2035 General Plan is intended to provide the control and regulation necessary to ensure that growth in the City of Folsom occurs in an orderly fashion,

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<sup>&</sup>lt;sup>1</sup> As set forth in Sections 15168 and 15145 of the State CEQA Guidelines respectively.

As defined in the Memorandum of Understanding between the Sacramento Local Agency Formation Commission,

to ensure that urban services and amenities are provided commensurate with need, and that the public health and safety is protected.

Section 3.2 defines the 2035 General Plan Planning Area.

The 2035 General Plan Planning Area is the geographic area for which the General Plan establishes policies about future urban growth, service delivery, and natural resource conservation. The boundary of the 2035 General Plan Planning Area is determined in accordance with State law requiring each City to include in its General Plan all territory within the boundaries of the incorporated area as well as "any land outside its boundaries which in the planning agency's judgment bears relation to its planning" (California Government Code Section 65300).

The Planning Area for the 2035 General Plan includes the entire city limits and approximately 5,600 acres outside the city limits in two separate areas (*Planning Areas 1 and 2*), as shown in Figure 3-2. ...

Planning Area 2 is an approximately 3,700-acre area outside the city limits and Sphere of Influence, and within unincorporated Sacramento County. This area comprises a portion of the City's designated Area of Concern, adopted by the Sacramento LAFCo in July 1996<sup>2</sup> (LAFCo 1996). ...

Both of these Planning Areas are considered to be related to, and influenced by, the City's planning processes, even though the land use designations and/or zoning of that land are regulated by the County of Sacramento, the State of California, and the U.S. Bureau of Reclamation. The 2035 General Plan Land Use Diagram shows the land uses approved by the County and state and federal agencies in these areas for reference only. Except for several policies related to a relocated City Corporation Yard, the Folsom 2035 General Plan does not assign land uses or specific policies to either of these two Planning Areas.

Chapter 3 additionally describes the intended uses of the PEIR in Section 3.11:

As indicated at the beginning of this chapter, this programmatic Draft PEIR is intended to review potential environmental impacts associated with the adoption and implementation of the 2035 General Plan ... Subsequent projects will be reviewed by the City for consistency with the 2035 General Plan and this EIR, and adequate project-level environmental review will be conducted as required by CEQA. Projects successive to this Draft PEIR could include, but are not limited to the following:

• Approval and funding of major projects and capital improvements.

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As defined in the Memorandum of Understanding between the Sacramento Local Agency Formation Commission, Sacramento County, and the City of Folsom, the "Area of Concern" is defined as the geographic area beyond the Sphere of Influence of a local agency in which land use decisions or other governmental actions of the County impact directly or indirectly upon the local agency or in which urbanization may be anticipated in the intermediate or long range planning horizons. In the case of Folsom, the effect of the Area of Concern designation is to require the County to notify the City of pending discretionary planning applications within the boundaries of the Area of Concern. (LAFCo 1996)

- Issuance of permits and other approvals necessary for implementation of the 2035 General Plan.
- Future Specific Plan, Planned Unit Development, and Community Plan approvals.
- Property rezoning consistent with the 2035 General Plan.
- Development Plan approvals, such as tentative maps, variances, conditional use permits, planned development permits, and other land use permits.
- Permit issuances and other entitlements necessary for public and private development projects.
- Development Agreement and community benefit agreement processing and approvals.

PEIR Chapter 5, *Introduction to the Analysis*, Section 5.5.1 specifically excludes Planning Area 2 from the geographic area assessed in the PEIR.

## Future Regulatory Agency and City of Folsom Actions

The State CEQA Guidelines discourage in the preparation of environmental documents. Section 15145 of the Guidelines states, "If, after thorough investigation, a Lead Agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact."

As noted in DPEIR Chapter 21, Required CEQA Analyses, Section 21.1.2, "Should the City seek to develop within Planning Area 1 or Area 2, many actions would need to occur prior to development, potentially including, but not limited to: General Plan Amendments, amendment of the City's Sphere of Influence, prezoning, annexation, approval of project-specific entitlements, and CEQA analyses." Several of these actions would require review and approval by the Sacramento Local Agency Formation Commission, and the negotiation of a tax sharing agreement with Sacramento County.

Thus, future actions necessary to construct urban uses within Planning Area 2 would be many and seaquential, and would involve several regulatory agencies in addition to the Folsom City Council. Forecasting when and how the decision makers of the City and the other agencies might act is unforeseeable. Future actions of the Folsom City Council, the County Board of Supervisors, and LAFCo commissioners would be dependent upon a future political climate, economic conditions, and State, federal, and regional policies regarding land use, water supply, climate change, and other areas of regulation, none of which can be forecast with certainty through the planning period of the 2035 General Plan.

Future environmental review, both programmatically and on a project-specific basis under CEQA and possibly the National Environmental Policy Act (NEPA), would be required at each of the steps in the process outlined above.

#### Conclusion

For potential urban development within the exiting city limits of the City of Folsom, the 2035 General Plan is the foundational document for regulating existing and future land uses. As such, the 2035 General Plan sets forth planned urban and open space land use designations

and provides extensive policies to guide and regulate future development that would be reviewed and considered in future zoning, permitting, funding and other approval actions. In the case of future urban development within the city limits, the General Plan could be characterized as a logical part of a chain of contemplated actions to urbanize those areas of the City that would not be preserved in open space. Thus, this PEIR evaluates the all actions necessary to implement the General Plan within the existing city limits and the potential indirect environmental effects engendered by urban development constructed and operated pursuant to the General Plan.

For Planning Area 2, the General Plan explicitly does not identify planned land uses or policies to guide or regulate future development. By this exclusion and the location of Parcel 2 outside of the Folsom city limits, the 2035 General Plan makes clear that Planning Area 2 is "land outside (*the City's*) boundaries which in the planning agency's judgment bears relation to its planning" consistent with California Government Code Section 65300, and in accordance with its prior identification by LAFCo as an Area of Concern.

As noted above, the establishment of urban uses in Planning Area 2 would require amendment of the 2035 General Plan, as well as the acquisition of a number of other entitlements from the City, LAFCo, and other entities. Additionally, the 2035 General Plan DPEIR does not evaluate any urban land uses within Planning Area 2, and any future proposal to site urban uses within Planning Area 2 would require extensive environmental review. Further, the cited uses of the 2035 General Plan PEIR do not include any of the extra-territorial actions noted above.

In summary, the City has treated Planning Area 2 in the 2035 General Plan as an extraterritorial area of interest consistent with previous LAFCo action and with the requirements of Government Code Section 65300, and the 2035 General Plan has set forth no land uses or policies with respect to Planning Area 2. City designation of all or a portion of Planning Area 2 for urban uses would require amendment of the 2035 General Plan and a number of other entitlements from several different regulatory agencies, each of which is beyond the control of the City. The 2035 General Plan PEIR does not evaluate any potential urban uses in Planning Area 2, thus necessitating either amendment of the 2035 General Plan PEIR or the preparation of subsequent CEQA and possibly NEPA documentation prior to consideration of urban uses within Planning Area 2. Finally, the uncertain timing of any public agency actions to site urban uses within Planning Area 2, and the unforeseeable political, economic, or regulatory climates existing at an unknown later date render any forecast of future actions to be speculative.

Based on the foregoing, the identification of Planning Area 2 within the 2035 General Plan's planning area is <u>not</u> a "logical part of a chain of <u>contemplated</u> actions" since the actions necessary to urbanize the area are outside of the 2035 General Plan project and would require amendment of the 2035 General Plan before they could proceed. Finally, forecasting the actions of future City decision makers, as well as those of other agencies, over the life of the 2035 General Plan is unknowable and would require undue speculation.

Consistent with CEQA Guidelines Section 15145, the City finds that this comment would result in undue speculation, and hereby terminates this discussion. The comment does not identify any non-speculative issues related to the adequacy of the information or environmental conclusions with respect to the potential for growth inducement presented in

the Draft PEIR, and no further response is necessary under CEQA. Because the comment does not raise any non-speculative concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

I-4 The comment states that the DPEIR notes an inconsistency of Planning Area 2 with the Sacramento Area Council of Government's (SACOG) Metropolitan Transportation Plan/Sustainable Communities Strategy. The comment states that SACOG recognized this inconsistency in its comments on the Notice of Preparation (NOP) for 2035 General Plan PEIR. The comment further states that the DPEIR does not address SACOG's NOP comments.

The comment is incorrect in its characterization of both SACOG's evaluation of the 2035 General Plan with MTP/SCS policies and the DPEIR's discussion of the 2035 General Plan's consistency with the MTP/SCS.

The SACOG NOP comment noted that no urban development was being proposed by the 2035 General Plan within Planning Area 2, but that the inclusion of Planning Area 2 within the 2035 General Plan planning area was a signal that the City is contemplating Planning Area 2 as a new growth area. In that light, SACOG requested that the City include policies in the 2035 General Plan that would guide the timing and conditions precedent for urban development of the area. The DPEIR evaluated the consistency of Planning Area 2 in Chapter 4, Land Use, Population, and Housing, and Chapter 21, Required CEQA Analyses.

Section 4.1.3 of Chapter 4 evaluated the consistency of the proposed 2035 General Plan with the adopted plans of other agencies, including SACOG. As reported in the DPEIR, this evaluation concluded that the 2035 General Plan was consistent with MTP/SCS and Blueprint policies. The potential growth inducing impacts of the 2035 General Plan, including the growth potential of Planning Area 2, were evaluated in Section 4.2.3 of Chapter 4. The DPEIR states in this section that:

Planning Area 2 comprises a portion of the City's designated Area of Concern, adopted by the Sacramento LAFCo in July 1996 (LAFCo 1996). ... Planning Area 2 also makes up a portion of an area designated as "Vacant Urban Designated Lands (2050)" in SACOG's Sacramento Region Blueprint - Preferred Blueprint Scenario. As set forth in the Preferred Blueprint Scenario, through the year 2050, urban growth in Folsom will occur on vacant land within the current city limits (including the Folsom Plan Area Specific Plan area) with small areas of existing urban uses being redeveloped with more intense mixed uses (SACOG 2004). Under the SACOG's Preferred Blueprint Scenario, the area designated as Vacant Urban Designated Lands, including lands within Planning Area 2, would not be developed until after the year 2050.

The horizon year of the proposed Folsom General Plan is 2035. Therefore, consistent with SACOG's Preferred Blueprint Scenario, the 2035 General Plan does not assign any land uses or policies to Planning Area 2, other than a policy reference regarding relocation of the City's Corporation Yard. Thus, identification of this area in the 2035 General Plan would not be considered to be growth inducing.

Section 21.1.1 of Chapter 21 also evaluates Planning Area 2 from the perspective of cumulative impacts. The DPEIR states:

Both Planning Areas 1 and 2 are identified as areas of concern to the City. However, the 2035 General Plan does not designate land uses within either Planning Area 1 or 2, and sets forth no goals or policies to amend the City's sphere of influence to include these areas or to annex these areas in the future. Under the SACOG's Preferred Blueprint Scenario, lands within Planning Area 2 would not be developed until after the year 2050. Since the 2035 General Plan would not encourage or discourage urban development in Planning Areas 1 or 2 within the 2035 General Plan's planning horizon, potential development of these areas are not considered in the cumulative context for this Draft PEIR. Should the City seek to develop within Area 1 or Area 2, many actions would need to occur prior to development, potentially including, but not limited to: General Plan Amendments, amendment of the City's Sphere of Influence, prezoning, annexation, approval of project-specific entitlements, and CEQA analyses.

Based on the evaluation contained in the DPEIR, SACOG concurred with the DPEIR's conclusions that the proposed 2035 General Plan, including Planning Area 2, <u>was</u> consistent with the MTP/SCS. See comments B-2 and B-8 of this Final PEIR. Thus, the comment's request that the PEIR be revised to address the 2035 General Plan's purported inconsistency with the MTP/SCS is not supported by SACOG, the administering agency for the MTP/SCS<sup>3</sup>.

The comment does not identify any unrefuted issues related to the adequacy of the information or environmental conclusions with respect to this issue as presented in the Draft PEIR, and no further response is necessary under CEQA. Because the comment does not raise any unrebutted concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

I-5 The comment states that the PEIR fails to address the potential impacts of urban growth within Planning Area 2, including those effects related to the growth of vehicle miles travelled, increased emission of greenhouse gasses and decreases in air quality.

Although the City does not disagree with the comment's characterization of the environmental effects of urban growth, the City does not agree with the comment's contention that Planning Area 2 would be a source of urban growth as designated by the 2035 General Plan under review in the PEIR. See responses to comments I-3 and I-4.

The comment does not identify any unrefuted issues related to the adequacy of the information or environmental conclusions with respect to this issue as presented in the Draft PEIR, and no further response is necessary under CEQA. Because the comment does not raise any unrebutted concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

The Sacramento Metropolitan Air Quality Management District (SMAQMD) has also stated that, "Overall, the City of Folsom has prepared a comprehensive General Plan that contains policies in the areas of sustainable transportation modes, mixes of land uses and densities, energy efficiency buildings and conservation efforts that support air quality and climate change improvements." See comment C-1 in Letter C of this FEIR.

I-6 The comment challenges the notion that Planning Area 2's designation within the 2035 General Plan's planning area is necessary to prevent Sacramento County from approving urban development in Planning Area 2. The comment cites Sacramento County policies and requirements that would prevent urban development in Planning Area 2. The comment recommends that the City of Folsom adopt policies that would maintain open space uses south of White Rock Road.

The comment raises policy issues and does not identify any issues related to the adequacy of the DPEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration. Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

I-7 The comment states that SACOG has determined that the identification of Planning Area 2 is inconsistent with the RTP/SCS, and that this inconsistency creates internal inconsistencies in the 2035 General Plan. The comment includes a discussion of the effects of new development at the margins of the urban area that could lead to increases in vehicle miles travelled (VMT) thereby resulting in increased emissions of air pollutants and greenhouse gases.

In its comments on the DPEIR, SACOG indicated that the proposed 2035 General Plan is in alignment with the RTP/SCS and the Blueprint. See response to comments B-2 through B-8, and I-4. Because SACOG has determined that the 2035 General Plan is in alignment with Blueprint and RTP/SCS principles, there is no internal inconsistency within the 2035 General Plan related to SACOG's regional plans. For a discussion of the City's position regarding the environmental impacts of marginal urban growth, and Planning Area 2's contribution to such growth, see the responses to comment I-3, I-4, and I-5.

The comment does not identify any unrefuted issues related to the adequacy of the information or environmental conclusions with respect to these issues as presented in the Draft PEIR, and no further response is necessary under CEQA. Because the comment does not raise any unrebutted concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

I-8 The comment suggests that the inclusion of Planning Area 2 in the 2035 General Plan raises issues that would necessitate revision of the General Plan, and revision and recirculation of the PEIR. The comment recommends that Planning Area 2 be removed from the 2035 General Plan planning area.

The City disagrees with the comment's conclusion that the 2035 General Plan is internally inconsistent and requires revision, or that the PEIR inadequately or incompletely evaluates the purported inducement of urban growth engendered by the identification of Planning Area 2 within the General Plan's planning area boundary. See responses to comments I-3 through I-7. With respect to the issues identified in the comment, as supported by the responses to comments I-3 through I-7, the City concludes that the 2035 General Plan is internally consistent, and that the DPEIR has adequately and completely evaluated the potential physical environmental effects of implementing the General Plan.

The comment does not identify any unrefuted issues related to the adequacy of the information or environmental conclusions with respect to these issues as presented in the Draft PEIR, and no further response is necessary under CEQA. Because the comment does not raise any unrebutted concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

I-9 The comment states that the DPEIR improperly avoids the identification of mitigation measures that could avoid or reduce the significant impacts of implementing the 2035 General Plan. The comment cites several provisions of the Public Resources Code in support of CEQA's requirements to identify necessary mitigation measures.

As discussed in DPEIR Chapter 5, *Introduction to the Environmental Analysis*, Section 5.5, the environmental evaluation set forth in the document focuses on the indirect environmental effects of implementing the 2035 General Plan.

To evaluate these indirect effects, the DPEIR identifies and describes two types of impacts: coverage effects and intensity effects. Coverage impacts are those that result from the coverage of land or otherwise physically interfering with a resource. Intensity impacts result from increased human activity. Section 5.5.2 further defines the areal coverage of developed uses that would occur with implementation of the 2035 General Plan. According to the DPEIR:

Using Geographic Information Systems (GIS), all parcels or lots within the 2035 Plan Evaluation Area were identified as developed or vacant (see Figure 5-1). Vacant parcels were further identified as being located north of Highway 50, or south of Highway 50 within the FPASP area. For vacant parcels north of Highway 50, the analysis identified 453 total vacant parcels encompassing 441 acres. Of these 453 parcels, 377 are lots within existing single-family residential subdivisions totaling 163 acres, with a gross median lot size of 16,125 square feet. Of the remaining 76 parcels, the majority are designated for commercial or multi-family uses. For these uses, the total acreage is 278 acres with a gross median parcel size of 37,150 square feet. Once the 453 parcels were identified, each was evaluated using aerial photographs to determine its condition. As evidenced on the aerial photographs, the overwhelming majority of both the single-family residential and Commercial/Multi-family residential parcels are remnant areas within subdivisions or larger development projects, and most have been disturbed by prior rough grading and/or the construction of roads and utilities.

There are a total of 3,336 acres in the FPASP area south of Highway 50, of which 1,118<sup>4</sup> acres would remain in open space. The remaining 2,218 acres would be developed with a variety of urban land uses and supporting infrastructure. Although potential environmental impacts could occur throughout the 2035 Plan Evaluation Area, the majority of the land available for new development of urban uses (77 percent of the citywide total or 2,218 acres) would be located within the FPASP area.

Of the 1,118 acres of open space, 1,054 acres would be qualified or Measure W open space. For further information regarding the different types of open space, see Chapter 3, *Project Description*, of the Draft PEIR.

The DPEIR uses standard environmental evaluation techniques in its evaluation of indirect impacts. As described in Chapter 5, Section 5.3, for each impact topic, the DPEIR describes the existing setting of the area the would be affected by implementation of the 2035 General Plan. As described in the preceding paragraphs, this area consists of the whole of the FPASP area south of Highway 50, and 453 scattered parcels within the city north of Highway 50. The DPEIR then describes the regulatory setting for each environmental topic. Sources of governing laws and regulations described in the DPEIR include: federal and state laws, regulations, and programs; regional agency rules, programs, and permitting standards; and City of Folsom regulations, permit requirements, and adopted standard construction specifications. The DPEIR also considers the previously adopted mitigation measures for the FPASP and Russell Ranch to be a binding source of regulation regarding potential environmental effects in the area south of Highway 50, and, as such, the DPEIR includes applicable FPASP/Russell Ranch mitigation measures in its discussion of the regulatory setting<sup>5</sup>. Because the Folsom City Council had previously considered and adopted these mitigation measures, there is no need to readopt the measures in the 2035 General Plan DEIR.

The DPEIR then sets forth the proposed goals, policies, and implementation programs of the 2035 General Plan that, if adopted and implemented, could affect whether a potential environmental impact could occur, and influence its magnitude.

After having set forth the environmental and regulatory settings, as well as 2035 General Plan goals and policies, for each environmental topic, the environmental analysis then evaluates whether urban development in the areas described in Chapter 5, Section 5.5.2 could adversely affect a particular environmental resource, and whether proposed 2035 General Plan goals and policies would act to avoid or reduce the magnitude of an identified effect.

If this assessment determines that a potential environmental effect could occur even with implementation of 2035 General Plan goals and policies, the analysis was continued to determine if existing rules, regulations, and requirements as set forth in the regulatory setting would avoid or reduce the potential effect below a level of significance. For areas north of Highway 50, the sources of regulation include those promulgated by State, federal, and regional agencies, and City of Folsom. For the FPASP/Russell Ranch areas south of Highway 50, the City's adopted mitigation measures are in addition to all other agency requirements as described previously. In effect, the FPASP/Russell Ranch area is subject to another level of mitigation not applicable to the area north of Highway 50.

The Folsom Plan Area Specific Plan was approved by the City of Folsom in June 2011. Prior to the approval of the FPASP, the City of Folsom certified an EIR/EIS that evaluated the potential environmental effects of implementing the 3,336-acre Specific Plan. The City adopted mitigation measures identified in the EIR/EIS, adopted a Mitigation Monitoring and Reporting Plan, made CEQA findings, and adopted a Statement of Overriding Consideration.

Since adoption of the FPASP, subsequent land use entitlements consistent with the Specific Plan have been processed by the City of Folsom, typically employing an Addendum to the EIR/EIS for CEQA compliance. Only one project within the FPASP area has sought to substantially modify the Specific Plan. The Russell Ranch development, located in the eastern portion of the FPASP requested an amendment to the modify the land uses designated by the Specific Plan for the Russell Ranch project area. The City prepared and certified an EIR, and adopted mitigation measures, for the Russell Ranch project prior to approving the Specific Plan amendment in May 2015.

The environmental analysis then assesses whether the application of all relevant regulations, including mitigation measures where adopted, would act to reduce an identified impact to a less than significant level. Often, the potential impacts of constructing and operating urban development pursuant to the 2035 General Plan south of Highway 50 were greater than impacts identified for the scattered parcels north of Highway 50 since the FPASP/Russell Ranch area was undeveloped and the majority of undeveloped parcels north of Highway 50 were remnant areas within previously approved land uses that had been subject to previous rough grading and the installation of roads and utilities.

For each impact topic, the DPEIR determined the magnitude of the effect for areas both north of Highway 50 and within the FPASP/Russell Ranch area. For the FPASP/Russell Ranch area south of Highway 50, the City of Folsom had previously adopted environmental findings regarding the residual significance of impacts, including those cases where the City had adopted mitigation. Because of the substantially greater area that would be urbanized (77 percent of the General Plan evaluation area) south of Highway 50, the City's previous environmental conclusions regarding impacts tended to govern the DPEIR's conclusions regarding the significance of impacts. However, in cases where a particular impact was unique to, or of a substantially greater magnitude in, the area north of Highway 50, the DPEIR identified a significant impact, irrespective of the level of the impact within the FPASP/Russell Ranch areas.

Once a residually significant impact was identified by the DPEIR, the evaluation continued to identify potential mitigation measures that would avoid or reduce the effect, consistent with the Public Resources code sections cited in the comment. For impacts that were unique to the area north of Highway 50 or of a greater magnitude than similar impacts within the FPASP/Russell Ranch area, the DPEIR identified mitigation measures, typically in identifying new policies or modifications to proposed policies to reduce the environmental effect. (For example, see mitigation measures PSR-4a through PSR-4m in DPEIR Chapter 16, *Public Services and Recreation Resources*.)

For impacts unique to the FPASP/Russell Ranch project area, or of a substantially greater magnitude than similar impacts north of Highway 50, the DPEIR deferred to the recently adopted mitigation adopted by the City in its approval of the FPASP and the Russell Ranch projects. As noted, the City had previously adopted mitigation measures for these two projects, and the measures need not be readopted to apply to the impacts caused by urban development consistent with the 2035 General Plan south of Highway 50. The reasons for this deference are several: 1. The measures had previously been adopted by the City; 2. In considering the previously adopted measures, the City had made determinations regarding the relative feasibility of the adopted measures and other measures that could have been adopted; 3. Based on these determinations, the City opted to adopt the measures cited in the DPEIR for the FPASP and Russell Ranch projects; and, 4. The City has previously approved development agreements and other entitlements that vested the FPASP/Russell Ranch projects with the land uses, conditions of approval, and mitigation measures previously approved.

For several environmental effects unique to the FPASP/Russell Ranch project area, or of a substantially greater magnitude than similar impacts north of Highway 50, the City found in its approval of the FPASP/Russell Ranch projects that, even with the imposition of mitigation measures, an impact would be significant and unavoidable. Because the land uses and activities designated for the FPASP/Russell Ranch area by the 2035 General Plan are the same as those

previously adopted by the City for this area, no new impacts or impacts of a greater magnitude than those previously identified would occur. Therefore, consistent with prior City findings, the DPEIR reaches the same environmental conclusions previously adopted by the City.

Thus, the DPEIR identifies mitigation measures where necessary and feasible consistent with CEQA requirements. Regarding the comment's contention that future urban development within Planning Area 2 would cause environmental effects that would require mitigation, the City disagrees with this contention based on the foregoing and responses to comments I-3 and I-4. For additional discussion, please refer to the responses to comments I-3 and I-4.

The comment does not identify any unrefuted issues related to the adequacy of the information or environmental conclusions with respect to these issues as presented in the Draft PEIR, and no further response is necessary under CEQA. Because the comment does not raise any unrebutted concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

I-10 The comment notes that the DPEIR identifies a significant and unavoidable impact to agricultural resources from implementation of the 2035 General Plan arising from the potential loss of Williamson Act contracted land south of the FPASP. The comment states that the RDEIR avoids identifying feasible mitigation prior to identifying the impact to be significant and unavoidable. The comment additionally provides examples of potential mitigation for the loss of agricultural resources that in the view of the comment would be feasible for the City of Folsom to adopt.

The comment is incorrect in its characterization of mitigating requirements for agricultural resources.

As set forth in DPEIR Chapter 7, Agriculture and Forestry Resources, there are no important agricultural or forestry resources within the 2035 Plan Evaluation Area for which the 2035 General Plan designates land uses or provides goals and policies. This area is coterminous with the city limits of the City of Folsom. The only agricultural impact identified in the DPEIR is the same as that identified in the FPASP EIR/EIS (impact 3A.10-4). As certified by the City in its approval actions related to the FPASP, the City found that implementation of the FPASP could lead to the non-renewal or potential cancellation of Williamson Act contracts on agricultural lands to the south of the FPASP area, south of White Rock Road. In certifying the EIR/EIS, the City found this indirect impact would be potentially significant. The City additionally found that feasible mitigation measures, such as participation in an agricultural conservation easement, were not available to reduce impacts associated with the cancellation of the Williamson Act contracts to a less-than-significant level because no such programs were available.

With respect to the example mitigation schemes cited in the comment, all have been implemented by counties (Stanislaus, Yolo), or by cities within their Spheres of Influence by establishing mandatory requirements for agricultural mitigation to be satisfied during annexation requests. In the case of the City of Folsom, the City does not have any regulatory authority over lands outside of the city limits and could not impose extra-territorial farmland mitigation requirements such as those enacted by Stanislaus or Yolo counties, or require the imposition of agricultural conservation easements over land outside of the city. In the case of the Elk Grove mitigation example, the area south of White Rock Road (including Planning

Area 2) addressed in DPEIR impact AG-1 is outside of the City of Folsom's Sphere of Influence, which is coterminous with the city limits. As noted in response to comment I-3, any future urbanization proposals that would require City approval for lands south of White Rock Road would require amendment of the 2035 General Plan and a number of other entitlements from several different regulatory agencies, each of which is beyond the control of the City. Additionally, as discussed in response to comment I-9, the City is limited in its ability to modify land uses to establish an agricultural buffer within the FPASP area adjacent to White Rock Road or impose additional mitigation within the FPASP area in light of previous environmental findings and project approvals authorized by the City.

Because the City does not have the ability to impose extra-territorial mitigation requirements, and it would be impracticable to revise land uses within the FPASP, the City determines that the suggested mitigation measures are infeasible.

The comment does not identify any unrefuted issues related to the adequacy of the information or environmental conclusions with respect to these issues as presented in the Draft PEIR, and no further response is necessary under CEQA. Because the comment does not raise any unrebutted concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

I-11 The comment states that the analysis of cumulative impacts to agricultural resources set forth in the DPEIR is inadequate because it does not include the evaluation of a list of similarly situated projects. The comment states that the cumulative analysis contained within the DPEIR does not evaluate the project's contribution to the loss of agricultural land in Sacramento County generally. The comment notes that the PEIR is required to identify mitigation for the cumulative loss of agricultural lands.

CEQA requires that a cumulative analysis be based on an examination of a future baseline using one of two methods. As set forth in DPEIR Chapter 21, Required CEQA Analyses, Section 21.1:

CEQA requires that one of two methods of establishing a future baseline be used:

- 1. A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or
- 2. A summary of projections contained in an adopted General Plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact. Any such planning document shall be referenced and made available to the public at a location specified by the lead agency [CEQA Guidelines Section 15130(b)(1)].

As set forth in Chapter 21, Section 21.1.1, the cumulative impact evaluation conducted for the DPEIR is based upon a summary of projections contained in the SACOG Blueprint and MTP/SCS, and the General Plans of Sacramento, El Dorado, and Placer Counties. Because these planning documents are themselves general in nature, the analysis of cumulative impacts based upon them is itself general in nature. See response to comment D-2 for additional information regarding the level of detail necessary for an EIR evaluating a General Plan.

Table 3-1 provides important farmland and grazing land conversion statistics for Sacramento, El Dorado, and Placer Counties for the last two years of record. Important farmlands are defined by the California Department of Conservation, Division of Land Resource Preservation as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland or Local Importance. Grazing land is not defined as an important farmland category. As noted in Table 3-1, 0.2 percent of all important farmlands within the three-county region have been converted to urban uses over the most recent period of record. (DOC 2018)

As noted in response to comment I-10, there are no important farmlands defined by the California Department of Conservation within the in the 2035 Plan Evaluation Area or adjacent to the City south of White Rock Road. Adjacent lands south of White Rock Road are classified as grazing land. Because there are no important farmlands in or adjacent to the City, implementation of the 2035 General Plan would not contribute to the cumulative conversion of important farmlands within Sacramento County or within the region.

For grazing lands such as those within the FPASP and the area south of White Rock Road, according to the State Department of Conservation, the three-county acreage of grazing land has increased by 0.6 percent to 377,120 acres over the period of record. This increase is the result primarily of important farmlands being reclassified based on better data in Placer County, or of lesser quality important farmlands losing access to irrigation and/or being fallowed. (DOC 2018)

Grazing lands in Folsom occur both north and south of US Highway 50. For those portions of the 2035 Plan Evaluation Area north of US Highway 50, grazing lands are delineated within areas that are identified by the 1988 and 2035 General Plans for urban development, within areas where the initial stages of urban conversion had been completed but where development has been paused, or within designated open spaces. Within the FPASP, up to 2,218 acres of grazing land would be converted to urban uses through the General Plan horizon year of 2035. The DPEIR determined that, because grazing land is not designated as important farmland by the California Department of Conservation, no adverse effect to important agricultural lands would occur indirectly or cumulatively with implementation of the 2035 General Plan.

However, the City previously had made the finding in certifying the FPASP EIR/EIS that implementation of the FPASP could indirectly encourage the cancellation of Williamson Act contracts south of White Rock Road. Based on this finding, the 2035 General Plan DPEIR identified both a significant indirect impact to these agricultural resources (Impact AG-1), and that based on the environmental conclusion of the DPEIR with respect to Impact AG-1 that the 2035 General Plan would make a cumulatively considerable contribution to the overall loss of agricultural resources within the three-county region assessed for cumulative effects.

Based on the foregoing, the City of Folsom finds that the cumulative analysis presented in the DPEIR is adequate and complete, and that the comment does not dispute the environmental conclusion set forth in the RDPEIR with respect to cumulative impacts to agricultural resources. Therefore, the comment does not identify any unrefuted issues related to the adequacy of the information or environmental conclusions with respect to cumulative agricultural impacts as presented in the Draft PEIR, and no further response is necessary under CEQA. Because the comment does not raise any unrebutted concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

Table 3-1 Trend of Farmland Conversion in Sacramento, El Dorado, and Placer Counties											
County	El Dorado		Placer		Sacramento		Regional Total	Regional Percentage			
Year	2012	2014	2014	2016	2014	2016					
Important Farmlands	64,120	64,007	98,600	94,732	208,650	207,483	366,222				
Important Farmlands Converted to/from All Other Uses (last 2 years of record)		-113		-2,914		-1,167	-4,194	-1.1%			
Important Farmlands Converted to Urban and Built-Up Land (last 2 years of record)		-34		-13		-527	-574	-0.2%			
Grazing Lands	193,797	193,679	27,689	30,267	153,454	153,174	377,120				
Grazing Land Converted to/from All Other Uses (last 2 years of record)		-118		2,578		-280	2,180	0.6%			
Grazing Land Converted to Urban and Built-Up Land (last 2 years of record)		-142		-673		-222	-1,037	-0.3%			

I-12 The comment states that the DPEIR fails to identify feasible mitigation to address the adverse effects of implementing the 2035 General Plan on visual quality. The comment suggests that the City establish an Open Space Overlay for the protection of open space within Planning Area 2 south of White Rock Road, and additionally adopt an open space plan.

With respect to the impact analysis, as explained in response to comment I-9 and set forth in the impact summary for Impact AES-1 on page 6-8 of the DPEIR, the evaluation identified a series of mitigating requirements and actions that would reduce the magnitude of the identified impact. These include existing Federal, State, and City policies, regulations and requirements, mitigation measures previously adopted by the City applicable to the FPASP area, and proposed 2035 General Plan goals, policies, and implementation programs. Since a residual impact was identified even after the application of all of these mitigating actions, the City sought to identify any additional feasible mitigation measures applicable to the impact.

In the case of AES-1, there were no feasible measures identified within the ability or jurisdiction of the City to feasibly implement. See response to comment I-10 regarding extraterritorial mitigation or modification of the approved land uses within the FPASP.

It was only after determining that existing requirements, previously adopted mitigation measures, and proposed 2035 General Plan policies would not fully mitigate the identified impact; and that there were no other feasible measures within the City's ability to feasibly implement, that the City determined Impact AES-1 to be significant and unavoidable. Rather than reflexively labeling the impact to be significant and unavoidable, the City endeavored in the analytical process outlined above to identify feasible mitigation measures where necessary for all impacts.

Based on the foregoing, the City disagrees with the allegation in the comment. Therefore, the comment does not identify any unrefuted issues related to the adequacy of the information or environmental conclusions with respect to visual quality impacts as presented in the Draft PEIR, and no further response is necessary under CEQA. Because the comment does not raise any unrebutted concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

I-13 The comment notes approval of the City's proposed modification of its traffic level of service standard and the 2035 General Plan's emphasis on appropriately intense development in the vicinity of Light Rail stations.

No response is necessary.

I-14 The comment states that the 2035 General Plan continues to prioritize single-occupancy vehicles by including Planning Area 2, which is underserved by transit and other transportation modes, within the General Plan planning area in contradiction of the vehicle miles travelled (VMT) and climate change policies set forth elsewhere in the 2035 General Plan document.

As noted in the response to comment I-3, the City disagrees that the inclusion of Planning Area 2 within the General Plan planning area would induce urban development outside of the existing City limits. See response to comment I-3. Thus, the 2035 General Plan is internally consistent regarding its VMT and greenhouse gas reductions goals.

Additionally, see DPEIR Chapter 17, *Transportation and Circulation*, Evaluation of Less-than-Significant Impacts, Questions (d), (e), and (f) Bikeway and Pedestrian Facilities, and Questions (e), and (f) Transit Facilities for more information on the 2035 General Plan's effect on modes of transportation other than single-occupancy vehicles.

The comment raises policy issues and does not identify any issues related to the adequacy of the DPEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration. Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

I-15 The comment states that the 2035 General Plan does not propose policies that would upgrade transit service to provide a travel option to single-occupancy vehicles.

DPEIR Chapter 17, *Transportation and Circulation*, Section 17.2.3, discusses study assumptions for future transit services serving the City of Folsom. As stated in this Section:

The assumed future transit services within Folsom are based on SACOG's 2036 MTP/SCS and the transit planning conducted for the FPASP.

The 2036 MTP/SCS includes the addition of passing tracks along RT's Gold Line between Sunrise Boulevard and the Historic Folsom light-rail station that will allow the current 30 minute service to be improved to 15 minute service. (RT has recently received SB-1 grant funding to permit Gold Line service to be improved more rapidly than previously planned.)

In April 2010, a Transit Master Plan was prepared for the FPASP area. The Transit Master Plan identified the roadways to be used by bus transit routes, locations for bus turnouts and pedestrian shelters, locations for bus transfer stations, alignments for fixed route rail service, and the location of rail service stations within the entire FPASP area. A key element of the Transit Master Plan is a "high capacity" bus route along Alder Creek Parkway that would link the residential areas with the major commercial areas of the FPASP and with the Hazel Avenue light rail station. For the purpose of this EIR, it was assumed that this bus service would be implemented by 2035 and operate at 15 minute headways from at least 6 a.m. to 6 p.m.

SACOG's 2036 MTP/SCS includes only modest additional improvements in transit service within the City of Folsom by 2035.

Additionally, the City of Folsom Transit Division, like RT, is considering additional non-fixed route ride-share services in order to better serve transit users. The City hopes to begin a pilot program late in 2018 or early 2019. The City is also coordinating with RT regarding RT's ride hailing service in Citrus Heights to extend the reach of the service to the Historic Folsom light rail station.

The comment raises policy issues and does not identify any issues related to the adequacy of the DPEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration. Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

I-16 The comment suggests that the City set targets for each mode of transportation in the City, tied to GHG emissions and VMT reduction targets. The comment further suggests that the City should seek additional funding sources and include additional policies to improve existing transit connections to increase biking and walking in the City.

As discussed in Chapter 12, *Global Climate Change*, numerous goals, policies, and implementation programs are in place that would lead to reductions in VMT, GHG emissions, and improvements to existing and new transportation infrastructure to promote non-vehicular modes of transport. Specifically, policies M.1.1.7 Transportation System Management and M 1.1.9 Transportation Demand Management include specific requirements to reduce peak hour vehicle trips and single-occupant vehicle travel. In addition, GHG reduction measure T-3 Adopt Citywide TDM and measure T-4 Adopt TDM for City Employees set specific VMT reduction targets that the City is committed to meeting by 2035.

In addition, Policy M 1.1.4 Existing Streets Retrofits and Implementation Program M-8 Bicycle and Pedestrian Funding include specific actions that focus on improving the existing transportation network to increase biking and walkability within the City. Implementation Program M-8 is described in detail on page 12-32 of the DPEIR. Further, GHG reduction measure T-2 Improve Streets and Intersection for Multi-Modal Use and Access sets targets for the City to improve existing roadways and intersections to promote walking and biking.

GHG reductions associated with these commitments were quantified and are shown in Table 12-4 of the DPEIR and Appendix H, including assumptions and calculation methods. No changes to the PEIR are necessary.

I-17 The comment states that transportation-related GHG emissions represent 52 percent of the City's emissions but the mitigation measures do not adequately reduce transportation-related emissions. The comment further states that the DEIR fails to propose and evaluate all feasible mitigation and does not consider alternative project designs that could focus more on transit, smart growth, or access to jobs/employment.

As shown in Appendix H of the DPEIR, estimated GHG reductions attributable to all incorporated transportation-related policies and implementation programs resulted in more GHG reductions than any other single sector of emissions in all forecasted future scenarios. In addition, the GHG reduction strategy considered all available and applicable measures that could be implemented effectively by the City of Folsom. Further, numerous measures specifically addressed fuel efficiency, alternatives to traditional diesel, VMT reduction strategies, including a new Mixed-Use Overlay to promote development near transit and in proximity to existing and future planned amenities. Further, as shown in Table 12-4 of the DPEIR, with incorporation Mitigation Measures GHG-1 through GHG-17, the City would be on track to meet a 2030 GHG emissions reduction target consistent with State targets. The EIR and associated GHG reduction strategy did consider all available measures and established an approach to meeting GHG targets by focusing on areas where the most potential for GHG reduction were possible. Appendix H of the DPEIR includes a description of all incorporated GHG reduction measures, associated GHG reductions, and calculation assumptions. Chapter 20 of the DPEIR discusses the alternatives that were evaluated, and the considerations taken when determining viable project alternatives. Further, Chapter 17

Transportation and Circulation discusses all the transit and transportation-related improvements that were assumed in the DPEIR. As discussed on page 17-35, the traffic analysis was based on known improvements to transportation and transit consistent with the Sacramento Area Council of Government's 2036 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS). Specifically, a new "high-capacity" bus route along Alder Creek Parkway was assumed. For purposes of conducting a traffic and VMT analysis for the 2035General Plan, only projects included in the MTP/SCS were included in the analysis since these projects are known to be planned for and funding sources have been identified. To include other larger transit projects at the General Plan scale would be speculative due to the lack of control the City of Folsom has in implementing large regional transportation improvements. No change to the PEIR is necessary.

I-18 The comment states that Impact GHG-2 does not substantiate the significant and unavoidable impact identified regarding the State's long-term 2050 goal and does not include all feasible mitigation.

As shown in Table 12-4 of the DPEIR, City of Folsom GHG emissions were projected out to years 2035 and 2050 and compared to GHG reduction goals that have been suggested by the State but have not been adopted to date. As discussed in Impact GHG-2, based on the emissions forecasted and the anticipated GHG reduction goals for future years, if no further City-action is taken, emissions continue to increase as currently estimated, and the State does formally adopt GHG reduction targets consistent with those shown in Table 12-4, then it is reasonable to conclude that the future goals would not be met. Appendix H of the DPEIR includes detailed descriptions of the methods and assumptions used to forecast emissions and provides substantial evidence used to reach the conclusion of significant and unavoidable.

Regarding the comment that additional mitigation needs to be included, Policy NCR 3.2.5 Climate Change Assessment and Monitoring is in place as shown on page 12-39 of the DPEIR that commits the City to continue to evaluate GHG emissions in the future. In addition, Policy NCR 3.2.1 Community Greenhouse Gas Reductions commits the City to reduce emissions to 80 percent below the 2020 target by 2050. Thus, if future GHG reduction targets are eventually passed into law for longer-term target years beyond 2030, the City will have the proper policies and mechanisms in place to monitor GHG emissions and review and update the GHG strategy if necessary to achieve the reductions. No changes are made to the PEIR.

I-19 The comment states that the City should consider investing in new transit services to reduce VMT and GHG emissions.

As discussed above in response to comment I-15, only transit projects planned for in the 2036 MTP/SCS were assumed to occur over the build out period of the General Plan. For more information see responses to comments I-15 and I-18. Further, a new "high capacity" bus line is planned along Alder Creek Parkway. New transit services are only viable in areas where demand for ridership is sufficient enough to warrant the investment in new services. Currently, the City of Folsom does not have the population or the demand to support a new transit line as the comment suggests. No changes are made to the PEIR.

I-20 The comment offers examples of VMT-reducing methods included in the CAPCOA Quantifying Greenhouse Gas Mitigation Measures document (2010), to achieve 2050 GHG reduction goals. It suggests specific measures should have been included.

To respond to this comment, the response addresses the specific recommended CAPCOA measures in groups, below.

#### TST-1 Provide Bust Rapid Transit, TST-3 Expand Transit Network, TST-4 Increase Transit Frequency/Speed

The SACMET model was used to prepare the travel demand forecasts and VMT estimates used to quantify GHG emissions associated with buildout of the general plan. SACMET includes both roadway and transit networks and trip generation, trip distribution and mode choice. Sub-models account for some key differences in behavior for higher density areas. Households are categorized by household size, number of workers, income and auto ownership.

The model estimates ridership for light rail and bus and the model does account for the differences in a "hi-capacity" compared to regular bus, due to its higher frequency and travel times. The existing year model was validated to existing (2015) transit ridership and thus the model provides reasonable estimates of future transit ridership and transit's impact on VMT.

For the General Plan, the addition of passing tracks on the Gold Line Light Rail (LRT) between Sunrise and Old Town Folsom was included, which would allow increased LRT frequency (from 30 to 15-minute headways)<sup>6</sup>. In addition, a hi-capacity bus route from Hazel LRT to El Dorado Hills Town Center running through Folsom along Easton Valley Parkway was assumed.

Thus, TST-3 Expand Transit Network, TST-4 Increase Transit Frequency/Speed, and TST-1 Provide Bust Rapid Transit are accounted for in the travel demand modeling and VMT estimates used to estimate GHG emissions in future years. When GHG emissions were estimated based on the model-generated VMT, GHG reductions associated with these measures are already accounted for. Applying these measures would thus result in doublecounting GHG reductions. See Appendix H in the DPEIR for an explanation of how GHG emissions associated with VMT were quantified.

#### LUT-4 Increase Destination Accessibility and LUT-5 Increase Transit Accessibility

The SACMET model is not sensitive to the higher potential for more short distance trips - and thus the amount of walk and bike trips - in a high density/mixed use development. Therefore, as explained in Appendix H, Measure T-1 (Reduce VMT Through Mixed and High-Density Land Use) estimates that a portion of new development would occur in the higher dense areas, near transit, and/or in mixed-use nodes. In accordance with CAPCOA guidance for measure LUT-9, VMT reductions, and associated GHG reductions, were estimated. VMT reductions accounted for by this measure capture VMT reduction associated with LUT-4 Increase

City of Folsom 3-81 2035 General Plan Update Final EIR

As of the date of this Final PEIR, RT had received SB-1 funding with which to pursue headway improvements on the Gold LRT line serving Folsom.

Destination Accessibility and LUT-5 Increase Transit Accessibility. See Appendix H in the DPEIR for calculation methods and assumptions.

# TRT-4 Implement Subsidized or Discount Transit Program and TRT-10 Implement School Pool Program

TRT-4 Implement Subsidized or Discount Transit Program applies to private organizations and not citywide. This measure could potentially apply to city employees, but measures already incorporated such as Measure T-4 Adopt TDM for City Employees (Attachment 1 of Appendix H), required by Implementation Program M-1 sets VMT reduction targets for City employees. Implementing a subsidy program is a potential way to reach the VMT reduction targets already established by Implementation Program M-1, and therefore, it would be double-counting to quantify GHG reductions from this measure in addition to what has already been quantified in GHG reduction Measure T-4 Adopt TDM for City Employees. See calculations and assumptions in Attachment 1 of Appendix H for more details. TRT-10 Implement School Pool Program applies to school districts and is beyond the scope of services of the City of Folsom. No changes are made to the DPEIR.

I-21 The comment states that the DPEIR fails to evaluate existing noise levels on future residential development that could occur in areas currently substantially developed with commercial uses. The comment states that 2035 General Plan policies that encourage mixed-use development within the East Bidwell Street Corridor could expose future residents to adverse levels of nighttime noise created by landscaping or maintenance activities at adjacent commercial facilities. The comment additionally suggests that the City ban the use of gasoline powered leaf blowers between the hours of 10 AM and 7 AM.

The City of Folsom enforces a Noise Ordinance adopted as Chapter 8.42 of the Folsom Municipal Code. Sections 8.42.040 and 8.42.050 regulate acceptable levels of exterior and interior noise. Section 8.42.040 makes it "unlawful for any person at any location within the incorporated area of the city to create any noise, or to allow the creation of any noise, ... which causes the exterior noise level when measured at any affected single- or multiple-family residence, school, church, hospital or public library situated in either the incorporated or unincorporated area to exceed the noise level standards (*set forth in the ordinance*). ..." Section 8.42.050 establishes similar standards for interior noise levels.

In evaluating noise effects in Impact N-1, the DPEIR finds that "General Plan implementation also could result in the siting of sensitive land uses in areas with high community noise levels in excess of General Plan standards." The impact summary statement also references FMC Chapter 8.42 as well as additional sources of noise control. Table 15-14 lists both Sections 8.42.040 and 8.42.050 and provides an explanation of how the implementation of these regulations would act to reduce noise levels at sensitive uses.

The City's Design Guidelines for Multifamily Development (Folsom 1998) require the preparation of a noise study for all multifamily developments proposed to be sited adjacent to any arterial street (*such as East Bidwell Street*), rail corridor, or other noise-generating uses. According to the Guidelines, potential noise will be reviewed and evaluated to identify any mitigation needed to ensure compliance with the City's Noise Ordinance. (Folsom 1998)

The comment suggests that the PEIR be revised to include a detailed analysis of the noise effects of operating leaf blowers and parking lot vacuums during nighttime hours on future residential uses adjacent to commercial areas of the city. The City is unwilling to undertake the requested study because it exceeds the appropriate level of detail for an EIR on a General Plan. For a discussion of the appropriate level of detail of the PEIR, see response to comment D-2.

The City finds that the analysis set forth in the PEIR adequately evaluates the potential for noise to interfere with the residential uses at a level of detail commensurate with the specificity of the 2035 General Plan. The comment does not identify any unrefuted issues related to the adequacy of the information or environmental conclusions with respect to noise impacts presented in the Draft PEIR, and no further response is necessary under CEQA. Because the comment does not raise any unrebutted concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

With respect to the suggestion that the City ban the use of leaf blowers between the hours of 10 a.m. and 7 a.m., the City respectfully suggests that the author meant 10 p.m. and 7 a.m. FMC Chapter 8.42, Section 8.42.040 currently bans the use of all equipment that would result in adverse noise levels at the exterior of any residence during the nighttime hours of 10 p.m. and 7 a.m. While Section 8.42.060 allows certain activities to be exempt from Noise Ordinance requirements, the operation of leaf blowers is not among the exemptions.

This portion of the comment raises policy issues and does not identify any issues related to the adequacy of the DPEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for their consideration. Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

I-22 The comment states that the inclusion of Planning Area 2 in the 2035 General Plan's planning area would be growth inducing. The comment states that the DPEIR is inconsistent in its evaluation of the potential growth inducing aspects of Planning Area 2. The comment quotes portions of DPEIR Chapter 20, *Alternatives Analysis*, in the introduction to Alternative 2, and Chapter 21, *Required CEQA Analyses*, from the evaluation of cumulative impacts to agriculture and forestry resources. The comment noties that the EIR prepared for the Southeast Connector roadway improvement project found that construction of that project would be growth inducing by providing additional transportation access to rural areas of Sacramento County. The comment concludes that the combination of implementation of the FPASP, Planning Area 2, and the Southeast Connector would increase growth pressures in the area south of White Rock Road.

For a discussion of the potential growth inducement potential engendered by the 2035 General Plan, including that posed by Planning Area 2 generally, see response to comment I-3.

With respect to the comment's citing of the DPEIR's discussion of Alternative 2 as leading to an inconsistency within the DPEIR's evaluation of growth inducement, the Alternative was developed to respond to a comment from SACOG on the Notice of Preparation for the 2035 General Plan PEIR. In its NOP comment SACOG expressed concern that the inclusion of Planning Area 2 within the 2035 General Plan's planning area might lead to an inconsistency with SACOG's adopted Sacramento Regional Blueprint and its designation of a large area (that includes Planning Area 2) for future urban development after the year 2050. The potential for growth inducement engendered by the 2035 General Plan is evaluated in DPEIR Chapter 4, Land Use, Population, and Housing, Section 4.2.3. This review determined that because the 2035 General Plan does not designate any portion of Planning Area 2 for urban development through the General Plan's horizon year of 2035, inclusion of Planning Area 2 within the 2035 General Plan's planning area would not result in growth inducement prior to the year 2050 as identified by SACOG in the Regional Blueprint's preferred scenario. In its review of the DPEIR, including the analysis of growth inducement, SACOG determined that the City's proposed actions with respect to Planning Area 2 would be consistent with the Sacramento Regional Blueprint and the Metropolitan Transportation Plan/Sustainable Communities Strategy. See comments B-4 and B-8.

Regarding the conclusions of the DPEIR's evaluation of the 2035 General Plan's indirect effects on agricultural resources (Impact AG-1) and cumulative effects on agriculture and forestry resources, the comment mischaracterizes the finding of the impact analyses. The conclusion of Impact AG-1 was that the development of urban uses within the FPASP (and not Planning Area 2) could potentially result in adjacent landowners not renewing Williamson Act contracts on farmlands south of White Rock Road, and that continued agricultural production could be imperiled. In fact, as noted in the DPEIR (page 7-2), the expiration of several Williamson Act contracts south of White Rock Road has already occurred (as of 2014 and 2016). The City's response to the potential for the future impediment of continued agricultural production south of White Rock Road was to include Planning Area 2 within the General Plan's planning area, but to decline to identify land uses or policies within the area to establish that such lands would not be developed within the life of the 2035 General Plan without requiring a General Plan amendment and the acquisition of additional entitlements from several different regulatory agencies. For further discussion of necessary entitlements prior to permitting urban development within Planning Area 2, see response to comments I-3.

With respect to cited growth pressures south of the City of Folsom, the comment is correct that the EIR completed for the Southeast Connector concluded that construction and operation of that facility would be growth inducing along its route, specifically within the FPASP. However, the Southeast Connector EIR identified measures such as directional interchanges that could reduce, though not avoid, growth inducing effects. The measures included the following policies to regulate access for areas designated by the appropriate land use agency's planning documents to remain rural (CSC JPA 2012):

- POP-1 Require Consistency with the JPA's Planning Principles the JPA, in developing the final design of the Project, will ensure that such design is consistent with the planning principles set forth in the Joint Powers Agreement that established the JPA, including:
  - d. Strategically apply access control and capacity characteristics to preserve and enhance regional functionality while discouraging growth in areas not

designated for growth as determined by the local jurisdiction's general plan;

- POP-2 Require Consistency with the JPA's Functional Guidelines. The JPA in the final design of the Project will consider the Functional Guidelines referenced in the in the JPA's Joint Powers Agreement, as they may be amended and adopted by the JPA, as summarized below:
  - Access Characteristics: To maximize the efficiency of the roadway, access
    to the Connector should be allowed only at a limited number of access
    points; principally, existing primary facilities and new facilities included in
    the MTP. Access should be limited to the greatest extent possible to
    retain efficiency, reduce congestion, and enhance mobility. New access to
    the Connector from areas not designated for growth in the general plans
    should not be permitted.

Since certification of the Southeast Connector EIR, an Initial Study/Mitigated Negative Declaration has been prepared and adopted that evaluated a detailed design for the Southeast Connector project from west of Prairie City Road to Latrobe Road in El Dorado Hills. Among other project features consistent with the adopted Southeast Connector, this initial segment project proposes new signalized intersections at Oak Avenue Parkway when extended, Scott Road east, and Empire Ranch Road. As described in Figure 3 of the Initial Study, neither the Oak Avenue Parkway or Empire Ranch Road makes provisions for roadway extensions south of White Rock Road consistent with the JPA's Planning Principles or Functional Guidelines. The Scott Road east intersection provides for a southerly leg to the intersection but does not make any provision for southbound turning movements. (CSC JPA 2016)

With respect to the Folsom Plan Area Specific Plan and the 2035 General Plan Circulation Element, neither document indicates the extension of any roadway south of White Rock Road.

Based on the foregoing discussion and including the discussion contained in other cited responses to comments, the City makes the following determinations regarding the issues raised by comment D-23:

**Potential Growth Inducement from Planning Area 2**: The City has determined that the inclusion of Planning Area 2 in the 2035 General Plan planning area would not induce urban development within Planning Area 2 or elsewhere in the area south of White Rock Road.

Alternative 2 – Deletion of Planning Area 2: Alternative 2 was developed to address a concern of SACOG regarding a potential inconsistency between the 2035 General Plan and the Sacramento Regional Blueprint regarding the potential for urban development in Planning Area 2. Upon review of the DPEIR, SACOG has determined that the 2035 General Plan is consistent with the Blueprint and the MTP/SCS.

Impacts to Williamson Act Contracts South of White Rock Road: The comment misconstrues the nature of the impact and the environmental conclusions identified in Impact AG-1 and in the cumulative analysis of agriculture and forestry resources reported in the DPEIR. The finding of these two impact statements was that implementation of the FPASP (and hence the FPASP portion of the 2035 General Plan) could interfere with continued

agricultural production, not that it would lead to urban development within the area south of White Rock Road.

Growth Inducing Effects of the Southeast Connector, FPASP, and 2035 General Plan:

The comment is correct in noting that the EIR prepared for the Southeast Connector identified a significant and unavoidable impact to growth inducement with implementation of the Connector project, including the reduction of an infrastructure barrier to development within the FPASP. The Connector EIR adopted several policy measures to reduce, but not avoid, growth inducement in areas adjacent to the Connector that were designated by local land use agencies for continued rural uses, such as the area south of White Rock Road. Detailed planning for the segment of the Connector between Prairie City Road and Latrobe Road indicates that major intersections, with the exception of Scott Road east are not designed to permit access south of White Rock Road. Additionally, neither the FPASP nor the 2035 General Plan circulation diagrams indicate the planned development of transportation facilities south of White Rock Road.

Thus, the comment does not identify any unrefuted issues related to the adequacy of the information or environmental conclusions with respect to growth inducement presented in the Draft PEIR, and no further response is necessary under CEQA. Because the comment does not raise any unrebutted concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

I-23 The comment speculates that the adoption of a lower LOS standard proposed in 2035 General Plan policy M 4.1.3 could lead to increased growth potential in greenfield areas adjacent to the City by "freeing up" capacity on the City's existing roadway network. The comment requests the PEIR evaluate the potential environmental effects of this potential growth.

The 2035 General Plan does not identify any "greenfield" areas adjacent to the City that could be developed in compliance with the GeneralPlan. As set forth in DPEIR Chapters 3, *Project Description*, and 5, *Introduction to the Environmental Analysis*, the area in which the General Plan designates land uses is limited to the area within the existing city limits. Except for the introduction of several new land use designations to increase the intensity of use around transit facilities, to provide for areas of mixed use in various areas of the city, and to identify a River District, the land uses proposed for the 2035 General Plan mirror the existing land use designations of the 1988 General Plan. Similarly, the 2035 General Plan limits the area affected by proposed policies to the existing city limits. Thus, any identification of any areas outside of the city limits that could be developed with urban uses would be speculative. See the response to comment I-3

The comment does not identify any unrefuted issues related to the adequacy of the information or environmental conclusions with respect to growth inducement presented in the Draft PEIR, and no further response is necessary under CEQA. Because the comment does not raise any unrebutted concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

I-24 The comment summarizes the major points contained in comments I-1 through I-23, and urges the City to consider additional policies supporting transit, infill development, and redevelopment rather than supporting future development on the urban fringe.

This comment raises policy issues and does not identify any issues related to the adequacy of the DPEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for their consideration. Because the comment does not raise any concerns regarding the content or environmental conclusions of the DPEIR, no changes to the PEIR are necessary.

#### REFERENCES

- California, State of, Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program; 2018. Important Farmland Data Availability, County Data for El Dorado, Placer, and Sacramento Counties, Land Use Conversion Tables, Tables A-6, A-24, and A-26. Accessed at <a href="http://www.conservation.ca.gov/dlrp/fmmp/Pages/county">http://www.conservation.ca.gov/dlrp/fmmp/Pages/county</a> info.aspx on May 21, 2018.
- Capital SouthEast Connector Joint Powers Authority (CSC JPA), 2016. Tiered Initial Study With Mitigated Negative Declaration, Capital Southeast Connector Segment D3/E1 Project, City Of Folsom, County Of Sacramento And County Of El Dorado, California. January 2016.
- \_\_\_\_\_\_, 2012. Capital SouthEast Connector Project Volume 2 of the Program Envronmental Impact Report Revisions to the Draft Program Environmental Impact Report. February 2012.
- Folsom, City of, Department of Public Works, Traffic Management, 2018. US Highway 50/Empire Ranch Road Interchange. Accessed at https://www.folsom.ca.us/city\_hall/depts/admin/traffic/empire\_ranch\_interchange/default. asp on May 20, 2018.
- Folsom, City of, 2005. Addendum to the Natoma Station EIR. April 13, 2005.
- Folsom, City of, 1998. City of Folsom Design Guidelines for Multifamily Development. May 26, 1998.
- Sacramento, County of. 2016a. 2016 Sacramento Countywide Local Hazard Mitigation Plan Update. December 2016.
- Sacramento Municipal Utility District (SMUD), 2018. Letter from Nicole Goi, SMUD, to Scott Johnson, City of Folsom; April 17, 2018.

#### 4 CHANGES TO TEXT OF THE ENVIRONMENTAL DOCUMENTS

#### 4.1 CHANGES TO THE ENVIRONMENTAL IMPACT REPORT

This section sets forth all substantive changes to the Program Environmental Impact Report (PEIR) that occurred after publication of the Draft PEIR (DPEIR). Such changes update or correct misinformation or errors in the text noted by the City of Folsom, as well as changes made in response to public and agency comment on the DPEIR. Within this chapter, additions to text are indicated by <u>underlining</u>; deletions of text are designated by <u>strikethrough</u>. The chapter and section references are ordered as they appear in the DPEIR. If a DPEIR chapter or a section of a chapter does not appear in this Chapter 4, no corrections or modifications were necessary. There would be no change in the residual significance of identified impacts with the updated information presented below, and no further modification of the PEIR would be necessary. Any changes to information that would appear in the Summary Table (Table 2-1 of the DPEIR) appear in the revised summary presented in Table 2-1 of this Final PEIR.

This addition of the following section to Chapter 5 would document and clarify the strategy of the environmental analysis completed for the PEIR and would not lead to any change in the determination of level of significance of any impact or any other environmental conclusions within the EIR.

#### 5 INTRODUCTION TO THE ENVIRONMENTAL ANALYSIS

#### 5.5.4 IMPACT ANALYSIS

The DPEIR uses standard environmental evaluation techniques in its evaluation of indirect impacts. As described in Section 5.3, for each impact topic, the DPEIR describes the existing setting of the area the would be affected by implementation of the 2035 General Plan. As described in the Section 5.5.1, this area consists of the whole of the FPASP area south of Highway 50, and 453 scattered parcels within the city north of Highway 50. The DPEIR then describes the regulatory setting for each environmental topic. Sources of governing laws and regulations described in the DPEIR include: federal and state laws, regulations, and programs; regional agency rules, programs, and permitting standards; and City of Folsom regulations, permit requirements, and adopted standard construction specifications. The DPEIR also considers the previously adopted mitigation measures for the FPASP and Russell Ranch to be a binding source of regulation regarding potential environmental effects in the area south of Highway 50, and, as such, the DPEIR includes applicable FPASP/Russell Ranch mitigation measures in its discussion of the regulatory setting<sup>1</sup>. Because the

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<sup>&</sup>lt;sup>1</sup> The Folsom Plan Area Specific Plan was approved by the City of Folsom in June 2011. Prior to the approval of the FPASP, the City of Folsom certified an EIR/EIS that evaluated the potential environmental effects of implementing the 3,336-acre Specific Plan. The City adopted mitigation measures identified in the EIR/EIS, adopted a Mitigation Monitoring and Reporting Plan, made CEQA findings, and adopted a Statement of Overriding Consideration.

Since adoption of the FPASP, subsequent land use entitlements consistent with the Specific Plan have been processed by the City of Folsom, typically employing an Addendum to the EIR/EIS for CEQA compliance. Only one project within the FPASP area has sought to substantially modify the Specific Plan. The Russell Ranch development, located in the eastern portion of the FPASP requested an amendment to the modify the land uses

Folsom City Council had previously considered and adopted these mitigation measures, there is no need to readopt the measures in the 2035 General Plan DEIR.

The DPEIR then sets forth the proposed goals, policies, and implementation programs of the 2035 General Plan that, if adopted and implemented, could affect whether a potential environmental impact could occur, and/or influence its magnitude.

After having set forth the environmental and regulatory settings, as well as 2035 General Plan goals and policies, for each environmental topic, the environmental analysis then evaluates whether urban development in the areas described in Chapter 5, Section 5.5.2 could adversely affect a particular environmental resource, and whether proposed 2035 General Plan goals and policies would act to avoid or reduce the magnitude of an identified effect.

If this assessment determines that a potential environmental effect could occur even with implementation of 2035 General Plan goals and policies, the analysis continues to determine if existing rules, regulations, and requirements as set forth in the regulatory setting would avoid or reduce the potential effect below a level of significance. For areas north of Highway 50, the sources of regulation include those promulgated by State, federal, and regional agencies, and City of Folsom. For the FPASP/Russell Ranch areas south of Highway 50, the City's adopted mitigation measures are in addition to all other agency requirements as described in the preceding sentence. In effect, the FPASP/Russell Ranch area is subject to another level of mitigation not applicable to the area north of Highway 50.

The environmental analysis then assesses whether the application of all relevant regulations, including mitigation measures where adopted, would act to reduce an identified impact to a less than significant level. Often, the potential impacts of constructing and operating urban development pursuant to the 2035 General Plan south of Highway 50 were greater than impacts identified for the scattered parcels north of Highway 50 since the FPASP/Russell Ranch area was undeveloped and the majority of undeveloped parcels north of Highway 50 were remnant areas within previously approved land uses that had been subject to previous rough grading and the installation of roads and utilities.

For each impact topic, the DPEIR determines the magnitude of the effect for areas both north of Highway 50 and within the FPASP/Russell Ranch area. For the FPASP/Russell Ranch area south of Highway 50, the City of Folsom had previously adopted environmental findings regarding the residual significance of impacts, including those cases where the City had adopted mitigation. Because of the substantially greater area that would be urbanized (77 percent of the General Plan evaluation area) south of Highway 50, the City's previous environmental conclusions regarding impacts tend to influence the DPEIR's conclusions regarding the significance of impacts. However, in cases where a particular impact is unique to, or of a substantially greater magnitude in, the area north of Highway 50, the DPEIR identifies a significant impact, irrespective of the level of the impact within the FPASP/Russell Ranch areas.

designated by the Specific Plan for the Russell Ranch project area. The City prepared and certified an EIR, and adopted mitigation measures, for the Russell Ranch project prior to approving the Specific Plan amendment in May 2015.

Once a residually significant impact is identified in the DPEIR, the evaluation continues to identify potential mitigation measures that would avoid or reduce the effect. The DPEIR identifies mitigation measures, typically by identifying new policies or modifications to proposed policies to reduce the environmental effect. (For example, see mitigation measures PSR-4a through PSR-4m in DPEIR Chapter 16, *Public Services and Recreation Resources*.)

For impacts unique to the FPASP/Russell Ranch project area, or of a substantially greater magnitude than similar impacts north of Highway 50, the DPEIR defers to the recently adopted mitigation adopted by the City in its approval of the FPASP and the Russell Ranch projects. As noted, the City has previously adopted mitigation measures for these two projects, and the measures need not be readopted to apply to the impacts caused by urban development consistent with the 2035 General Plan south of Highway 50. The reasons for this deference are several: 1. The measures had previously been adopted by the City; 2. In considering the previously adopted measures, the City had made determinations regarding the relative feasibility of the adopted measures and other measures that could have been adopted; 3. Based on these determinations, the City opted to adopt the measures cited in the DPEIR for the FPASP and Russell Ranch projects; and, 4. The City has previously approved development agreements and other entitlements that vested the FPASP/Russell Ranch projects with the land uses, conditions of approval, and mitigation measures previously approved.

For several environmental effects unique to the FPASP/Russell Ranch project area, or of a substantially greater magnitude than similar impacts north of Highway 50, the City found in its approval of the FPASP/Russell Ranch projects that, even with the imposition of mitigation measures, an impact would be significant and unavoidable. Because the land uses and activities designated for the FPASP/Russell Ranch area by the 2035 General Plan are the same as those previously adopted by the City for this area, no new impacts or impacts of a greater magnitude than those previously identified would occur. Therefore, consistent with prior City findings, the DPEIR reaches the same environmental conclusions previously adopted by the City.

The summary of this analysis for each impact in the DPEIR are set forth in a table at the beginning of each impact statement. A sample table is set forth below.

Impact XX-2 (impact topical abbreviation and number) Summary Sentence of Impact Topic			
Applicable Regulations	A summary listing of Federal, State, regional, and local regulations applicable to the impact topic		
Adopted Mitigation Measures	Adopted FPASP and Russell Ranch mitigation measures, if any, that apply only within the boundaries of those two projects		
Proposed GP Policies that Reduce Impacts	A listing of proposed 2035 General Plan policies that could reduce the magnitude of the identified impact		
Significance after Implementation of GP Policies	A conclusion regarding the significance of the identified impact prior mitigation, if required.		
Mitigation Measures	Additional mitigation if required.		
Significance after Mitigation	A conclusion regarding the significance of the identified impact after mitigation if any is imposed.		

This correction would simply clarify the regulatory setting and would not lead to any change in the determination of level of significance for any environmental conclusions within the EIR.

### 10 CULTURAL RESOURCES

Tal	Table 10-1 Significant Historic Built Environment Resources in the 2035 Plan Evaluation Area				
#	Primary/Trinomial	Resource Name	Address	Register	
1	P-34-479/ CA-SAC- 452-H	Former Jacob Broder Ranch Complex Location	Vicinity of Blue Ravine Road and Green Valley Road	N/A	
2	P-34-507/CA-SAC-480	Folsom Train Depot	200 Wool Street	NRHP/HRI	
3	P-34-461/ CA-SAC- 434-H	Natomas Ditch System, Blue Ravine Segment	Off Blue Ravine Road	NRHP	
4	P-34-3898	Coloma Road-Nimbus Dam	Along Nimbus Dam Road, north of Hwy 50	SHL	
5	P-34-2339	Folsom Powerhouse	West bank of American River, in Folsom Lake State Recreation Area	NRHP/ SHL	
6	P-34-3895	Folsom-Overland Pony Express Route	Not Available	SHL	
7	Not Available	Terminal of CA's First Passenger RR	Not Available	SHL	
8	P-34-956	Cohn House	305 Scott Street	NRHP	
9	Not Available	Railroad Section Gang Foreman's Residence	815 Oakdale Street	NRHP	
10	P-34-439/ CA-SAC- 412-H	Ashland Freight Station	200 Wool Street	NRHP N/A	
11	N/A	Rainbow Bridge (Bridge #24C-67)	Greenback Lane over the American River	NRHP/ CA Bridge Inventory	
12	P-34-2331	Chung Wah Cemetery	Mormon Street vicinity, near Lake Natoma	NRHP	
13	N/A	Orangevale Avenue Bridge	6615 Orangevale Avenue	Eligible for CRHR	
14	N/A	Historic Railroad Alignment	7000 Baldwin Dam Road	Eligible for CRHR	
15	N/A	Various Historic Residences	600, 700, and 800 blocks of Figueroa Street	Eligible for CRHR	
16	N/A	Saint John the Baptist Church	100 Natoma Street	Eligible for CRHR	
17	N/A	Odd Fellows and Mason Cemeteries	Within Lakeside Memorial Lawn Cemetery	Eligible for CRHR	
18	N/A	Eucalyptus and Olive Grove	13417 Folsom Boulevard	Eligible for CRHR	
<del>19</del>	N/A	Chinese Diggings	Not Available	Eligible for NRHP	
20	N/A	Murer House	1121 Folsom Boulevard	Eligible for NRHP	
21	N/A	Folsom Dam and Powerplant	7794 Folsom Dam Road	Eligible for NRHP, Listed on CRHR	
22	N/A	Folsom Dam Power Substation	7794 Folsom Dam Road	Eligible for NRHP, Listed on CRHR	
23	N/A	Murer Gas Station	701 Sutter Street	Eligible for NRHP, Listed on CRHR	
24	N/A	Negro Bar	Negro Bar Recreation Area	CPHI SAC-017	

Table 10-1 Significant Historic Built Environment Resources in the 2035 Plan Evaluation Area

#	Primary/Trinomial	Resource Name	Address	Register
25	N/A	Young Wo Cemetery	Natoma Street near Sutter Street	Eligible for CRHR
26	P-34-009, 008/CA- SAC-308-H	Folsom Mining District	Not Available	Eligible for NRHP
27	P-34-335/ CA- SAC/308-H	Folsom Mining District	Not Available	Eligible for NRHP, CRHR
28	P-34-453/CA-SAC- 426-H	Townsite, Folsom Chinatown	Not Available	Eligible for NRHP, CRHR
29	P-34-455/CA-SAC- 428-H	Sacramento Valley Railroad	Not Available	Eligible for NRHP, CRHR
30	P-34-2262	Natoma Diggings	Not Available	Eligible for NRHP
31	P-34-2269	Natomas/Colorado-Pacific Dredge tailings	Mississippi Bar	Contributor to District eligible for the NRHP, Listed on the CRHP
32	P-34-2276/CA-SAC- 308-H	Natoma Ground Sluice Mining / Chinese Diggings	Not Available	Eligible for the NRHP/HRI
33	N/A	Natoma Ground Sluice Diggings, water conveyance		Eligible for NRHP
34	P-34-3873	Prairie City Townsite	Not Available	SHL
35	N/A	Folsom Prison Historic District	Folsom Prison	Recommended eligible for NRHP, CRHR

Note: SHL = State Historic Landmark

Source: National Register of Historic Places, 2011; California Register of Historical Resources, 2011; City of Folsom Cultural

Resources Inventory, 2007; City of Folsom 2005.

#### 12 GLOBAL CLIMATE CHANGE

The text on page 12-2 of Chapter 12, *Global Climate Change*, of the DPEIR under "Greenhouse Gas Emissions Sources" is hereby revised to describe hydrofluorocarbons.

Emissions of GHGs are attributable in large part to human activities associated with the transportation, industrial/manufacturing, electricity generation, agricultural, residential, and commercial emissions sectors. In California, the transportation sector is the largest emitter of GHGs, followed by the industrial sector (California Air Resources Board [CARB] 2017). Emissions of CO<sub>2</sub> are byproducts of fossil fuel combustion. Methane, a highly potent GHG, primarily results from off-gassing (the release of chemicals from nonmetallic substances under ambient or greater pressure conditions) and is largely associated with agricultural practices and the decomposition of waste in landfills. Nitrous oxide is also largely attributable to agricultural practices and soil management. CO<sub>2</sub> sinks or reservoirs are the two most common processes for removing CO<sub>2</sub> from the atmosphere. Sinks or reservoirs include vegetation and oceans. Vegetation and oceans absorb CO<sub>2</sub> through sequestration and dissolution (CO<sub>2</sub> dissolving in the water), respectively, and are the two most common CO<sub>2</sub> removal processes. Hydrofluorocarbons (HFCs) are highly potent GHG emissions generated primarily by refrigeration and airconditioning equipment.

The text on page 12-5, in the second paragraph under "Effects of Climate Change on the Environment," is hereby revised to clarify the opening statement.

Physical conditions beyond average temperatures could be indirectly affected by the accumulation of GHG emissions. Rising global average temperatures can affect our climate and weather systems, with additional disruptions from precipitation, drought, flooding, ocean acidification, wildfires, and other impacts. For example, changes in weather patterns resulting from increases in global average temperature are expected to result in a decreased volume of precipitation falling as snow in California and an overall reduction in snowpack in the Sierra Nevada. Based upon historical data and modeling, the California Department of Water Resources projects that the Sierra snowpack will experience a 25-40 percent reduction from its historic average by 2050 (California Department of Water Resources 2008:4). An increase in precipitation falling as rain rather than snow also could lead to increased potential for floods because water that would normally be held in the Sierra Nevada until spring could flow into the Central Valley concurrently with winter storm events (CNRA 2012:5). This scenario would place more pressure on California's levee and flood control system.

The text on page 12-16, Policy M 4.2.4: Coordination with SMAQMD, is hereby revised as follows.

Policy NCR 3.2.6: Electric Vehicle Charging Stations. Encourage the installation of electric vehicle charging stations in parking spaces throughout the city, prioritizing installations at multifamily residential units.

The text on page 12-17, Policy M 4.2.4: Electric Vehicle Charging Stations, is hereby revised as follows.

**Policy NCR 3.2.6: Coordination with SMAQMD.** Coordinate with SMAQMD to ensure projects incorporate feasible mitigation measures to reduce <u>both construction and operational</u> GHG emissions and air pollution if not already provided for through project design.

The text within Impact GHG-1 on pages 33-34 of Chapter 12 is revised as follows:

Environmental Effects of Measures: Implementation of Mitigation Measures GHG-1 through GHG-1516 would result in new policies and regulations for reducing GHG emissions. Measures include creating new programs or funding sources, updating the municipal code, and revising overall GHG reduction targets for various sectors. Implementation of the measures would not result in an expansion of the area within the Planning Area devoted to urbanized land uses, and would not act to increase the intensity of existing or planned land uses. These measures would not directly result in any increased construction activities or increases in operational-related GHG emissions. No environmental effects would occur beyond those identified in this PEIR.

#### Level of Significance After Mitigation: Less than significant.

With implementation of the identified mitigation measures, the proposed 2035 General Plan would contain a comprehensive strategy that achieves a communitywide GHG emission reduction target consistent with State targets (i.e., 40 percent below 1990 levels by 2030), and sets the City on course towards achieving ongoing GHG emission reductions in the future through the year 2050.

Further, per capita emissions for target year 2030 would be 5.9 MTCO<sub>2</sub>e under the 2035 General Plan and full implementation of the proposed mitigation measures identified above, which would be below the state-recommended limit of 6 MTCO<sub>2</sub>e per capita. In addition, emissions associated with municipal operations would be consistent with State goals targets to achieve emission levels of 40 percent below 1990 levels, assuming full implementation of the proposed mitigation measures identified above. Thus, considering the established State targets set by SB 32 for 2030, the proposed 2035 General Plan would not conflict with any applicable plan, policy, or regulation adopted for reducing GHG emissions. With incorporation of Mitigation Measures GHG-1 through GHG-1516, this impact would be reduced to a less-than-significant level.

Impact GHG-2 Potential to conf 2050	lict with long-term statewide GHG emissions reduction goals for	
Applicable Regulations	See Table 12-3	
Adopted Mitigation Measures	FPASP Mitigation Measures 3A.4-1, 3A.4-2a, 3A.4-2b, Russell Ranch Mitigation Measure 3A.2-2	
Proposed GP Policies that Reduce Impacts	NCR 3.2.1 NCR 3.2.2, NCR 3.2.4, NCR 3.2.5 (See Table 12-3)	
Significance after Implementation of GP Policies	Significant; mitigation required	
Mitigation Measures	GHG-17: Amend Policy NCR 3.2.5	
Significance after Mitigation	Significant and unavoidable.	

As noted in the 2017 Scoping Plan, the long-term goal of achieving 2 MTCO<sub>2</sub>e per capita by 2050 represents the State's commitment to achieving its "fair share" of GHG emissions reductions required under the Paris Agreement, which identified scientifically-based global emissions levels required to put the world on track to limit global warming to below 2°C, thereby avoiding the most catastrophic and dangerous impacts of global climate change (CARB 2017: 99). Additionally, the 2020 and 2030 targets codified into State law per AB 32 and SB 32

were established consistent with the long-term trajectory of emissions reductions required to achieve the 2050 goal.

As discussed above under Impact GHG-1, adoption of the proposed 2035 General Plan and incorporation of Mitigation Measures GHG-1 through GHG-1416 would result in emissions reductions that would ensure the City of Folsom would be consistent with the 2030 statewide emissions limit of 6 MTCO<sub>2</sub>e per capita. Proposed mitigation measures identified under Impact GHG-1 would result in substantial reductions in GHG emissions from various sectors by improving energy efficiency in existing buildings, expanding on renewable energy sources, requiring ZNE renewable energy sources and improved energy efficiency in for all new buildings, reducing VMT through various measures and by focusing development in high-density nodes, reducing waste generation, and conserving water. As a result of these policies, programs, and mitigation measures GHG emissions, on a per capita basis, would continue to decline beyond 2030. As shown in Table 12-4, 2035 per capita emissions would be reduced to approximately 5.4 MTCO<sub>2</sub>e and 2050 per capita emissions would be reduced to approximately 5.0 MTCO<sub>2</sub>e.

Revised Table 12-4 follows this revised text, and is shown below. Concluding text from Impact GHG-2 is hereby revised to correct reference to Mitigation Measure GHG-17 as follows.

**Significance of Impact:** Significant.

#### Mitigation Measure GHG-17:

#### Modify Policy NCR 3.2.5 Climate Change Assessment and Monitoring.

Continue to assess and monitor performance of GHG emissions reduction efforts beyond for 2020, 2030, and beyond, including progress toward meeting longer-term GHG emissions reduction goals for 2035 and 2050 by reporting on the City's progress annually, updating the GHG inventory and forecasts at least every five years, and preparing updates to the GHG Strategy in the General Plan, as appropriate; as well as assess and monitor the effects of climate change and associated levels of risk in order to plan a community that can adapt to changing climate conditions and be resilient to negative changes and impacts.

#### Level of Significance After Mitigation: Significant and unavoidable.

Implementation of Mitigation Measure GHG-1617 would ensure the City continues to monitor progress towards achieving adopted 2020 and 2030 GHG emissions reduction targets, as well as longer-term goals to 2050. Further, Mitigation Measure GHG-16 commits the City to updating their GHG Inventory and GHG Strategy contained within the 2035 General Plan to ensure that emissions reductions are achieved and sufficient to meet future goals or new targets that may be established by the State, and that the most current and feasible GHG emission reducing policies and programs are in place to reduce emissions. Nonetheless, because total GHG emissions reductions quantified to date for both the proposed GPU and mitigation measures identified above cannot demonstrate how the long-term statewide emissions reduction goal of 2 MTCO<sub>2</sub>e by 2050 would be achieved, this impact would remain significant and unavoidable.

		GHG Reduction (MTCO2e/year)			
Location in 2035 General Plan	GHG Reduction Measure Number and Description <sup>2</sup>	ription <sup>2</sup> 2020		2035	2050
Building Energy Sector			l	<u> </u>	I.
PFS 8.1.7 <sup>1</sup>	E-5: Reduces energy use at City facilities by 20 percent below 2014 levels by 2035.	388	876	1,180	1,847
PFS 8.1.3, Program PFS-22	E-6: Sets City goal to supplement 25 percent of the City's operational electricity with renewable energy sources by 2035. Renewable energy includes on-site generation or offsite purchase agreements.	79	264	310	310
PFS 8.1.9, Program PFS-23	E-2: Applies GHG reductions associated with voluntary replacement of existing water heaters with high-efficiency and alternatively-powered water heaters.	0	1,326	1,856	1,856
PFS 8.1.5, PFS 8.1.4, Program PFS-24	E-3: Assumes continued participation in existing energy efficiency upgrade programs and an increased participation rate into the future.	48	574	623	623
PFS 8.1.3, Program PFS-24	E-4: Assumes continued participation in existing renewable energy retrofit programs and an increased participation rate into the future.	1,844	3,328	3,325	3,324
NCR 3.2.3, LU 9.1.10, LU 1.1.13, LU 1.1.417, Program PFS-25, Program LU-6	E-1: Applies GHG reductions associated with building energy efficiency and renewable energy generation in new development through CALGreen Tier 1 and ZNE.	262	1,501	2,171	4,048
Transportation Sector					
LU 3.1.1, LU 3.1.5, LU 3.1.6, LU 4.1.2, LU 4.1.3, NCR 3.1.3	T-1: Applies GHG reductions associated with reduction in VMT from development in mixed use nodes and near transit.	2,038	3,722	4,373	3,869
NCR 3.2.7, Program PFS-26	T-6: Phases in requirements for use of high-performance renewable diesel in construction equipment	0	5,116	22,196	28,330
M 1.1.9, NCR 3.1.3, Program M-1	T-3 and T-4: Implement TDM program to reduce VMT.	0	742	1,140	1,324
M 1.1.10, M 4.2.4, M 6.1.3, Program M-3, Program M-4	T-8: Installation of electric vehicle charging stations throughout city in commercial, office, and City facilities	0	4,243	5,949	5,949
PFS 8.1.8, Program PFS-14	T-7: Requires City on-road fleet conversion to alternative fuel and use of high-performance renewable diesel.	0	2,874	4,824 4,042	<del>6,148</del> <u>5,150</u>
M 2.1.15, M 1.1.4, M 1.1.6, M 1.1.5, M 2.1.2, M 2.1.3, M 2.1.4, Program M-8	T-2: Sets goal for City to improve existing intersections/streets and requires future development to include pedestrian and bicycle amenities in streets and intersections.	0	268	431	486
M 4.2.1, M 4.2.2, M 4.2.3, Program M-11 <sup>1</sup>	T-5: Reduces minimum parking requirements	0	82	125	699

	CHOR I II W N I I I I I I I I I	GHG Reduction (MTCO2e/year)			
Location in 2035 General Plan	GHG Reduction Measure Number and Description <sup>2</sup>	2020	2030	2035	2050
Solid Waste Sector	-		I.	-	
PFS 9.1.3, Program PFS-18, Program PFS-19, Program PFS-20, Program PFS-21	SW-1 and SW-2: Sets reduced per person disposal rate target and implements composting program to divert food and green waste from landfills.	6,279	11,793	15,400	19,482
Water/Waste Water Sector			•		•
PFS 3.1.3, PFS 3.1.9, Program PFS-27	W-1 and W-2: Increases water efficiency and reduces outdoor water use in new residential development.	0	293	309	394
PFS 3.1.3, PFS 3.1.9, Program PFS-27	W-3: Reduces water consumption at City facilities.	416	357	360	487
Total Reductions	· ·				
Total Reductions (Community)		11,355	37,360	64,575 63,793	79,179 78,181
Total Reductions (Municipal)		908	4,649	<del>7,224</del> <u>6,441</u>	9,572 8,573
Community Totals, and Targets (years 2020 and 2030), and Long-Term Goals (years 2035 and 2050) <sup>13</sup>		GHG Emissions (MTCO <sub>2</sub> e/year)			
Community Total (State regulations only)		636,389	594,745	617,192	738,467
Community Emissions (all modified 2035 General Plan policies and State regulations)		625,034	557,385	552,617 553,400	659,288 660,287
Community Emissions Targets (years 2020 and 2030) and Long-Term Goals (years 2035 and 2050) <sup>43</sup>		642,246	570,447	470,080	263,052
Gap (Surplus)		(17,212)	(13,061)	82,537 83,320	<del>396,230</del> 397,235
Per Capita Emissions		7.7	5.9	5.4	5.0
			•		
Municipal Totals and Targets				8,852	11,086
1		7,889	8,196	0,032	11,000
Municipal Total (State regulations only)	eral Plan policies and State regulations)	7,889 6,981	8,196 3,547	1,629 2,411	11,000 1,515 2,513
Municipal Totals and Targets  Municipal Total (State regulations only)  Municipal Emissions (all 2035 modified Gene  Municipal Target (years 2020 and 2030) and I	,		· ·	1,629	1,515

MTCO<sub>2</sub>e= metric tons carbon dioxide equivalent

Notes: GHG= greenhouse gas
TDM= traffic demand management VMT= vehicle miles traveled ZNE= zero net energy GHG= greenhouse gas

Folsom population growth based on buildout projections developed for the General Plan project (Mintier Harnish 2017). Population data used for per capita emissions by year: 2020: 80,833; 2030: 95,074; 2035: 103,110; 2050: 131,526

- 1: Policies contained in the Draft General Plan and not recommended as mitigation, and have associated GHG reductions.
- <sup>2</sup>: GHG Reduction Measure numbers in this table correspond with the GHG Reduction Measure numbers in Appendix G, Climate Change.
- 3: GHG emissions targets are set based on established State-mandated GHG emissions limits for years 2020 and 2030 by AB 32 and SB 32, respectively. Goals are used to represent long-term GHG levels for years beyond what is currently mandated by law. Goals are provided for informational purposes only and show anticipated GHG emissions for future years (2035 and 2050).

Source: Ascent Environmental Inc. 2017

#### 14 HYDROLOGY AND WATER QUALITY

This correction would add additional clarifying information to the text of Impact HWQ-6 and would not lead to any change in the determination of level of significance for this impact or any other environmental conclusions within the EIR.

Impact HWQ-6 Expose people or structures to significant risk due to flooding			
Applicable Regulations	National Flood Insurance Act, Senate Bill 5, Central Valley Flood Protection Plan, FMC Chapter 14.32.		
Adopted Mitigation Measures	None available.		
Proposed GP Policies that Reduce Impacts	Policies SN 1.1.1 - 1.1.4, SN 3.1.1 - 3.1.5		
Significance after Implementation of GP Policies	Less than significant.		

The effects of the development envisioned in the 2035 General Plan would have the potential to expose people or structures to a significant risk of loss, injury, or death due to flooding, including flooding resulting from the failure of a levee or dam. This would include flooding in the FPASP area and north of Highway 50.

The effects of new development related to a variety of flood risks are discussed under previous impact statements. Impacts related to:

- Flooding due to the alteration of the course of a stream or river are discussed under *Impact HWQ-3*
- New development leading to runoff levels that exceed stormwater drainage capacity are discussed under Impact HWQ-4
- The placement of housing within a 100-year floodplain is discussed under *Impact HWQ-5*.

This section therefore focuses on the flooding risk associated with the failure of dams and levees.

There are no levees protecting the City of Folsom. However, Folsom is subject to flooding associated with the failure of Folsom Dam or one of the saddle or auxiliary dams that also hold water in the lake. In addition, there are a number of small dams that impound water in the FPASP area, which could impact proposed development in that area.

Dam failures can result from a number of natural or man-made causes such as earthquakes, erosion of the face or foundation, improper siding, rapidly rising flood waters, structural/design flaws, and deliberate human actions (Sacramento County 2016). The catastrophic failure of a dam can result in numerous adverse impacts on a community, including:

- Loss of life
- Damage to property
- Creation of secondary hazards such as release of hazardous materials or exposure of highvoltage electric lines
- Loss of electrical generation and other life support systems

The impacts of potential flooding in the FPASP area resulting from failure of Folsom Dam was not evaluated in the FPASP EIR/EIS. The inundation zone shown in the 2016 Sacramento Countywide Local Hazard Mitigation Plan Update inundation map shows that the northwest portion of the FPASP area is subject to inundation. Much of that area is reserved as open space associated with Alder Creek, but some areas planned for urban development would also be affected.

The FPASP EIR/EIS evaluated the impacts of failure of the five dammed ponds within the FPASP area and three dammed ponds upstream of this area that appear to hold water throughout the year, and therefore pose some flooding threat due to dam failure. The EIR/EIS noted that height of most of the dams and the volume of water they store is unknown, and it is therefore also unknown whether any of these dams are within the jurisdiction of DSOD, and no evaluation of these dams has not been conducted to determine stability, potential for risk of failure, or estimated area of downstream inundation in the event of failure. Because of these uncertainties, the FPASP EIR/EIS concluded that development in the FPASP area could result in people or structures downstream of these features to be exposed to a significant risk of flooding if the dams were to fail. The EIR/EIS identified Mitigation Measure 3A.9-4, which requires the inspection of all of dams within the FPASP area and upstream of it, the evaluation of the potential inundation area for all existing dams, and the implementation of all feasible recommendations from these studies. The EIR/EIS concluded that, with the adoption of Mitigation Measure 3A.9-4, this impact would be reduced to a less-than-significant level.

The principal risk related to inundation due to dam failures within the 2035 Plan Evaluation Area, including the FPASP area, and the area north of Highway 50, would be the failure of Folsom Dam, the Mormon Island Auxiliary Dam, or one of the wing dams or dykes, particularly as a result of a seismic event. The Local Hazard Mitigation Plan (Sacramento County 2016) contains the results of a simulation of the failure of one or more of the Folsom Dam system (Folsom Dam, one of the five dikes, the wing dam, or the Mormon Island Auxiliary Dam). This simulation estimated that such a failure would result in the inundation of more than 15,000 parcels within the city and place roughly 40,000 residents at risk. In addition, 91 critical facilities (e.g. emergency services, hospitals, schools, care facilities, critical infrastructure) would be within the inundation zone. Monetary losses were estimated at between 2.8 and 9.2 billion dollars.

As noted in the Local Hazard Mitigation Plan, the likelihood of dam failure is considered unlikely. As defined by the Local Hazard Mitigation Plan, "unlikely" is an event with a "less than 1 percent chance of occurrence in the next 100 years, or (*with*) a recurrence interval of greater than every 100 years. (Sacramento County 2016)

The 2016 Sacramento County Local Hazard Mitigation Plan evaluated the potential for climate change to affect the risk of dam failure, including Folsom Dam and its subsidiary dams. The Local Hazard Mitigation Plan stated that, "Increases in the volume and intensity of precipitation, as well as warmer and earlier springs accelerating the timing and rate of snow melt, could increase the potential for dam failure and uncontrolled releases in Sacramento County." However, according to the Local Hazard Mitigation Plan, even considering this information, the likelihood of a failure of Folsom Dam would be unlikely. (Sacramento County 2016a)

Additionally, most of the FPASP area would be outside of the inundation zone, as would the southeast portion of the city north of Highway 50. As indicated on Draft PEIR Figure 5-1, these two areas would be the locations of the majority of new urban development identified by the 2035 General Plan.

Table 14-6 lists existing federal and state laws, City regulations, policies from the 2035 General Plan, and mitigation measures included in the FPASP EIR/EIS that could reduce the impacts of dam failures. This table also sets forth how each cited law or regulation acts to reduce these impacts.

Table 14-6 Regulatory Requirements and Proposed 2035 General Plan Goals/Policies Related to Exposure of People or Structures to Significant Risk Due to Flooding			
Measure Identification How the Regulation or Policy Avoids or Reduces Impact			
FEDERAL REGULATIONS			
National Flood Insurance Act  Discourages development in the 100-year floodplain, which could reduce number of structures exposed to floods due to dam failure. Requires flood insurance for structures within the 100-year floodplain, which could mitted cost impact of a dam failure.			
STATE REGULATIONS			
SB 5	Discourages development within the 200-year floodplain, which could reduce the number of structures exposed to floods due to dam failure.		
Central Valley Flood Protection Plan	Supports actions to reduce flood risk within the Central valley, including auxiliary spillway at and raising of Folsom Dam.		
California Water Code – Dam Safety Program	DWR Division of Safety of Dams provides oversight for the construction and maintenance of dams above a certain size, including Folsom Dam. Requires periodic maintenance, inspections, and reporting.		
CITY REQUIREMENTS			
Folsom Municipal Code Chapter 14.32	Requires uses vulnerable to floods to be protected against flood damage, which could reduce the impact of inundation due to dam failure.		
FOLSOM PLAN AREA SPECIFIC PLAN EIR/EIS			
Mitigation Measure 3A.9-4	Reduces risks associated with failure of small dams located within FPASP by requiring inspection of these dams and implementing improvements recommended by inspectors.		
RUSSELL RANCH EIR			
None			
2035 GENERAL PLAN GOALS AND	D POLICIES		
Policy SN 1.1.1: Emergency Operations Plan	Reduces impacts resulting from dam failure by developing and implementing an Emergency Operations Plan to define City's emergency response.		
Policy SN 1.1.2: Community Emergency Response Team	Reduces impacts resulting from dam failure by training citizens to mobilize and provide assistance during an emergency.		
Policy SN 1.1.3: Cooperation	Reduces impacts resulting from dam failure by coordinating response with other institutions in the City.		
Policy SN 1.1.4: Multi- Hazard Mitigation Plan	Reduces impacts resulting from dam failure by defining and implementing measures to prepare for and respond to emergencies.		
Policy SN 3.1.1: 100-Year Floodway	Regulates new development within the 100-year floodplain which may reduce the number of structures impacted by inundation from dam failure.		

Table 14-6 Regulatory Requirements and Proposed 2035 General Plan Goals/Policies Related to Exposure of People or Structures to Significant Risk Due to Flooding		
Measure Identification	How the Regulation or Policy Avoids or Reduces Impact	
Policy SN 3.1.2: Development within the Inundation Boundary	Reduces impacts resulting from dam failure by developing standards, in coordination with USACE to develop standards for development within the inundation boundary.	
Policy SN 3.1.3: Public Facilities	Reduces impacts resulting from dam failure by requiring the location of critical emergency response facilities outside of the 200-year floodplain, which may also be outside of the dam failure inundation boundary.	
Policy SN 3.1.4: Flood Control Costs	Reduces impact resulting from dam failure by minimizing new development within the 100-year floodplain which may reduce the number of structures impacted by inundation from dam failure.	
Policy SN 3.1.5: Agency Coordination	Coordination of flood management activities with federal, state, and regional agencies could reduce the loss of life and property associated with a dam failure by providing early warning of a disaster, and coordinating rescue and relief efforts.	

Source: Planning Partners 2017.

As set forth in Table 14-6, a number of federal and state regulations may reduce, but not eliminate the impact of dam failures. The National Flood Insurance Act incidentally may lead to fewer urban uses being sited within the inundation area of a failure of Folsom Dam. The Act also requires that urban uses within the 100-year floodplain obtain flood insurance, reducing the potential monetary losses associated with a dam failure. SB 5 also could act to discourage new development within the 200-year floodplain thereby reducing the population at risk. The Central Valley Flood Protection Program has supported improvements to the Folsom Dam system that have reduced the likelihood of failure. The Dam Safety Program element of the California Water Code reduces the risk of failure of Folsom Dam or other smaller dams in the FPASP area by requiring inspections and maintenance of dams. These regulations would apply to both the FPASP area and the area north of Highway 50.

The City of Folsom provides certain limited protection against the impacts of dam failure through its Municipal Code, as shown in Table 14-6.

The FPASP EIR/EIS does not contain any mitigation measures that would protect against or mitigation the impacts of a failure of Folsom Dam. However, it does contain a mitigation measure addressing the impacts of failure of the small dams located within and adjacent to the FPASP area that store water year-round.

While the potential impacts of the failure of Folsom Dam would be catastrophic, such an event would be unlikely. Additionally, implementation of the 2035 General Plan would not substantially increase the number of structures and people exposed to inundation due to the failure of Folsom Dam since much of the new development identified in the General Plan would be constructed outside of the inundation zone. For these reasons, this impact would be considered to be less than significant.

Significance of Impact: Less than significant.

Mitigation Measures: None required.

#### 22 LIST OF PREPARERS

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# ATTACHMENT A

Revised Appendix H Global Climate Change Technical Appendix This page intentionally left blank.

# Appendix H

# 2035 General Plan Draft PEIR Global Climate Change Technical Appendix

#### INTRODUCTION

As part of the City of Folsom's General Plan Update (2035 General Plan), a climate action plan (CAP) was prepared that will be integrated with the General Plan Policy Document and analyzed in the Program EIR. The CAP consists of a baseline greenhouse gas (GHG) emissions inventory, a forecast of future GHG emissions, recommended CAP measures to reduce GHG emissions, and recommended general plan goals, policies, and implementation programs to both achieve estimated GHG reductions associated with the CAP measures and monitor the results of CAP implementation over time. The CAP integrated within the 2035 General Plan would serve as the City's "plan for the reduction of greenhouse gases", per Section 15183.5 of the CEQA Guidelines, once the 2035 General Plan is approved and the Program EIR is certified.

This appendix summarizes the methods, assumptions, and results of the GHG Inventory and the GHG reduction measures, and is organized into three primary sections, as follows:

- 1. Summary of 2014 Community and Municipal Operations GHG emissions inventory;
- 2. Summary of the GHG emissions projections for 2020, 2030, 2035, and 2050, including recommended GHG reduction targets;
- 3. Quantification of GHG emissions reductions associated with proposed GHG reduction measures incorporated into the 2035 General Plan.

#### Attachments:

**Attachment 1:** Greenhouse Gas Emission Reductions Calculations and Assumptions

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#### 1 Greenhouse Gas Emissions Inventory

The initial phase in the preparation of the City of Folsom's CAP is to conduct a baseline GHG emissions inventory. In 2009, the County of Sacramento published an integrated, county-wide GHG emissions inventory, which included emissions from both communitywide sources and municipal operations for the unincorporated portions of Sacramento County as well as each of the incorporated cities, including the City of Folsom (City). The baseline year for emissions reporting in that inventory was 2005. Ascent Environmental, Inc. (Ascent) reviewed the reported emissions sectors, data sources, and methods used in the 2005 inventory as a basis for conducting an update to the City's GHG inventory. For this update of the City's GHG inventory, a baseline year of 2014 was used. In addition to quantifying communitywide emissions (Community Inventory), Ascent also included a separate inventory for the City's municipal operations (Municipal Inventory). This section summarizes the results, methods, and assumptions used in the 2014 City of Folsom GHG emissions inventory update.

Based on the modeling conducted, the community of Folsom generated approximately 657,892 metric tons of carbon dioxide equivalents (MTCO<sub>2</sub>e) in 2014. Emissions attributable to the City's operations were approximately 7,469 MTCO<sub>2</sub>e in 2014. Major emissions sectors included building/facility energy use, onroad vehicles, off-road vehicles and equipment, water treatment and conveyance, wastewater management, solid waste, and high global warming potential (GWP) gases. Due to the low level of agriculture activity, agriculture-related emissions (e.g., agriculture off-road equipment, enteric fermentation from livestock, fertilizer-related) were not included in this inventory update. Emissions, data sources, and methods used for emission quantification are explained in further detail below. Table 1 presents a summary of the 2014 Community Inventory, and Table 2 presents a summary of the 2014 Municipal Inventory.

Table 1 2014 City of Folsom Community GHG Emissions Inventory

Sectors	2014 (MTCO <sub>2</sub> e/yr)	Percent of Total (%)
Building Energy Use	235,955	36
On-Road Vehicles	342,865	52
Off-Road Vehicles	26,683	4
Solid Waste	13,073	2.0
Water-Related (water treatment and conveyance)	1,325	0.2
Wastewater (process and sewer/pumping emissions)	3,282	0.5
High GWP Gases	34,708	5
Total	657,892	100

 $Notes: \qquad GHG = greenhouse \ gas; \ GWP = global \ warming \ potential; \ MTCO_2e = metric \ tons \ of \ carbon \ dioxide \ equivalent; \ yr = year.$ 

Source: Data compiled by Ascent Environmental in 2016.

Table 2 2014 City of Folsom Municipal GHG Emissions Inventory

Sectors	2014 (MTCO <sub>2</sub> e/yr)	Percent of Total (%)
Building Energy Use	2,137	29
Total On-Road (Includes Employee Commute and City Fleet)	4,247	57
Off-Road Mobile (Off Road Vehicles and Equipment)	138	2
Solid Waste Generation	71	1
Traffic Signals	101	1
Street Lights	727	10
Water-Related (water treatment and conveyance)	15	<1
Wastewater (wastewater pumping and process emissions)	32	<1
TOTAL	7,469	100

Notes: GHG = greenhouse gas; MTCO₂e = metric tons of carbon dioxide equivalent; yr = year

Source: Data compiled by Ascent Environmental in 2016.

#### 1.1 DATA SOURCES AND METHODS

## 1.1.1 Inventory

The 2014 GHG emissions inventory update includes several changes to the data sources and emission factors used, along with changes in methods, compared to the 2005 baseline inventory. These differences were necessary in cases where the original data sources used in the 2009 inventory were no longer available or have not been updated. New methods that provide more accurate emissions estimates are available for sectors such as the on-road vehicles and solid waste sectors. For these reasons, an accurate comparison showing changes in emissions between the 2005 and 2014 inventories is not possible and was not included in the analysis.

The general approach used for both Community and Municipal GHG inventory emission calculations is consistent with International Council for Local Environmental Initiatives (ICLEI), California Air Resources Board (CARB), California Climate Action Registry and the Climate Registry guidance. The approach for the Community Inventory is consistent with the *U.S. Community Protocol for Accounting and Reporting of Greenhouse Gas Emissions*, Version 1.0 (ICLEI 2012) and the approach for the Municipal Inventory is consistent with the *Local Government Operations Protocol for the Quantification and Reporting of Greenhouse Gas Emission Inventories*, Version 1.1 (ICLEI 2010). The following section summarizes data sources and methods used in estimating the City's 2014 Community and Municipal Inventories.

# 1.1.2 Overall Assumptions Applied to Both Community and Municipal Operations

#### UTILITY EMISSION FACTORS

Emissions of carbon dioxide ( $CO_2$ ), methane ( $CH_4$ ), and nitrous oxide ( $N_2O_2$ ) per megawatt hour (MWh) or therm of natural gas vary greatly by location and from year to year depending on numerous factors. Utility-specific factors for GHG emissions were obtained for the year 2014 and used throughout the inventory to estimate GHG emissions from electricity and natural gas consumption. Sources for electricity and natural gas emission factors are shown below.

- Electricity: Utility electricity emission factors for CO<sub>2</sub> were provided by the Sacramento Municipal Utility District (SMUD) directly (SMUD 2016). Electricity emission factors for CH<sub>4</sub> and N<sub>2</sub>O were obtained from the U.S. Environmental Protection Agency's (EPA's) Emissions & Generation Resource Integrated Database (eGRID) 2012 GHG Annual Output Emission Rates (EPA 2012).
- Natural Gas: Utility natural gas emission factors for CO<sub>2</sub> were provided by Pacific Gas & Electric (PG&E) directly (PG&E 2015). Electricity emission factors for CH<sub>4</sub> and N<sub>2</sub>O were obtained from The Climate Registry Emission Factors (2014).

#### **GLOBAL WARMING POTENTIALS**

GHG emissions other than  $CO_2$  generally have a stronger insulating effect (e.g., ability to warm the earth's atmosphere or greenhouse effect) than  $CO_2$ . This effect is measured in terms of a pollutant's GWP.  $CO_2$  has a GWP factor of one while all other GHGs have GWP's measured in multiples of one. CARB currently uses GWP factors published in the Fourth Assessment Report (FAR) from the Intergovernmental Panel on Climate Change (IPCC), where  $CH_4$  and  $N_2O$  have GWP's of 25 and 298, respectively (IPCC 2007). This means that  $CH_4$  and  $N_2O$  would be 25 and 298 times stronger than  $CO_2$ , respectively, in their potential to insulate solar radiation within the atmosphere. This inventory uses the same FAR GWP values.

#### POPULATION AND EMPLYOMENT

Population data, obtained from the U.S. Census Bureau, for the city was used to estimate wastewater process and high-GWP emissions for the Community Inventory. The total number of City employees was used for various sectors in the Municipal Inventory to scale the emissions from the Community Inventory. City employee data were provided by the City.

## 1.1.3 Sector-Specific Assumptions and Methods

#### **BUILDING ENERGY**

Community Inventory: This sector includes emissions associated with energy consumption (electricity and natural gas) for all buildings located within the city limits. This sector also includes electricity consumption from night/street lighting associated primarily with commercial/industrial buildings. Energy data and emissions were further categorized by residential and commercial/industrial land uses. Note that because City-specific energy use data were available for water treatment and conveyance facilities/buildings, electricity and natural gas use associated with these uses were subtracted from this sector and reported in the water-related and the wastewater sectors, respectively. See discussion of these sectors below.

**Municipal Inventory:** This sector includes emissions associated with energy consumption for all buildings owned and operated by the City. Emissions associated with energy consumption for City facility irrigation and outdoor lighting (such as at parks and street medians/shoulders) was also included in this sector, because in most cases electricity consumption data for lighting and irrigation was indistinguishable from building energy. Further, electricity consumption for onsite irrigation is associated with irrigation systems and meters which is considered building energy. Energy consumption associated with conveying water to buildings is captured in the water-related sector, described separately below.

Similar to the community inventory, energy consumption attributable to building energy and associated with water treatment, water conveyance, and wastewater pumping/conveyance was reported in the water-related and the wastewater sectors, respectively. See discussion of these sectors below.

- Data and Method: With regards to the Community Inventory, electricity consumption for the year 2014 was provided directly by SMUD for all accounts within the city. Natural gas consumption for the year 2014 was provided directly by PG&E for all accounts within the city.
- With regards to the Municipal Inventory, electricity, natural gas, and diesel (from back-up generators) consumption for the year 2014 was provided by the City. Emissions were calculated based on utility intensity factors described above. Emission factors were derived for gallons of diesel consumed based on data provided by the City for diesel generators used in 2014.

#### TRAFFIC SIGNALS AND STREET LIGHTS

**Municipal Operations:** This sector is included in the Municipal Inventory only. Emissions associated with electricity consumption for all City-owned and operated traffic signals and street lights were quantified.

■ Data and Method: The City provided electricity consumption data for traffic signals and street lights. Emissions were calculated based on utility intensity factors described above.

#### SOLID WASTE

The City does not operate a solid waste facility and therefore all solid waste is sent to landfills outside city limits. Approximately 92 percent of solid waste generated by Folsom residents and businesses is sent to Sacramento County Kiefer Landfill. The remaining waste is sent to numerous other landfills in the surrounding area. Emissions associated with all landfills receiving waste generated by community-wide sources within the city were included in the inventory.

**Community Inventory:** Community emissions include fugitive CH<sub>4</sub> emissions from the decomposition of waste that occurs at landfills. Community solid waste emissions were based on total solid waste generation for the year 2014.

**Municipal Inventory:** Although the City does not operate a landfill, solid waste generated by the City's municipal operations was estimated using community waste generated emissions and scaling by the total number of City employees. Waste-in-place emissions were not included as no landfills are operated by the City.

■ Data and Methods- Community-wide emissions associated with solid waste generation were calculated using ICLEI Community Protocol Equation SW.4.1 which calculates community-generated waste sent to landfills. Total solid waste generation by amount, type, and disposal landfill was available from the California Department of Resources Recycling and Recovery (CalRecycle).

### WASTEWATER

Wastewater from the city is treated by the Sacramento Regional County Sanitation District (Regional San) at the Sacramento Regional Wastewater Treatment Plant in Elk Grove. Therefore, no wastewater process emissions occur within the city limits.

**Community Inventory:** Wastewater process emissions and energy consumption associated with wastewater conveyance within the city is included in this sector. The Community Inventory includes wastewater treatment process emissions for the entire city. Process emissions at the Regional San treatment plant include electricity consumption for treatment, process  $N_2O$ , wastewater effluent containing  $N_2O$ , and emissions from biogas combustion.

In addition, the City operates wastewater conveyance/ sewer pumps that collect wastewater within the city until it reaches Regional San interceptors. Emissions associated with energy consumption from these facilities were also included in the Community Inventory.

**Municipal Inventory:** Although the City does not operate a wastewater treatment plant, process emissions associated with municipal operations were included for informational purposes and scaled down from the Community Inventory based on City of Folsom employment numbers.

Emissions associated with wastewater conveyance were estimated based on energy use for wastewater conveyance systems (e.g., pumps, sewer units). Wastewater conveyance and pumping-related emissions were also included in the Community Inventory. However, because these facilities are directly operated by the City, they were included in the Municipal Inventory as well.

- Data and Methods- Wastewater treatment process emissions for Regional San were calculated in accordance with Local Government Operations Protocol, Version 1.1. For the Community Inventory, process emissions were based on the city's 2014 population. For the Municipal Inventory process emissions were scaled to city's 2014 employment numbers.
- With regards to emissions associated with energy use for wastewater conveyance and pumping, total energy and wastewater managed for these facilities was provided by the City. For the Community Inventory, all energy consumed from these facilities was quantified based on utility intensity factors. For the Municipal Inventory, a wastewater electricity intensity factor was derived based on total wastewater managed by the City and total electricity consumed for wastewater conveyance facilities. This electricity intensity factor was applied to total water consumed by municipal facilities. Note that this approach is slightly conservative as not all water consumed would end up being processed through City conveyance systems, due to evaporation, ground water absorption, and other factors.

### WATER-RELATED

The City operates the Folsom Water Treatment Plant (WTP) and obtains all potable water from the Folsom Reservoir, a surface water source. A portion of north-west Folsom is served by the San Juan Water District (SJWD). Part of the City's water supply system includes treatment facilities, pump stations, and conveyance pipes.

**Community Inventory:** Water-related emissions for the Community Inventory include energy consumption for potable water treatment, conveyance and pumping for all water consumption within the city. Energy consumption associated with treatment and distribution of potable water to buildings/facilities was not included in the building energy sector data to avoid double counting.

**Municipal Inventory:** The Municipal Inventory includes emissions from water treatment and water conveyance/pumping facilities apportioned to municipal water consumption.

- Data and Methods: Total energy use for the City's WTP and all associated water-related facilities was provided by the City. Water consumption data were provided by the City, excluding the portion served by SJWD. Based on the energy use and water consumption data provided for the City of Folsom's water service area, city-specific electricity intensity factors for treatment and conveyance were calculated.
- For the portion served by SJWD, water consumption for all SJWD water sent to the city (including the Ashland portion which is served by the City) was provided by SJWD (Tony Barela [SJWD], phone communication with Dimitri Antoniou [Ascent Environmental], 2016). The water total was apportioned to the part not served by the City, based on parcel data. Energy intensity factors for SJWD were available from the Assembly Bill (AB) 32 Water-Energy Assessment published by SMUD and the Regional Water Authority (SMUD 2014).
- ✓ For the municipal water-related emissions, the calculated water treatment and conveyance intensity factors were applied to municipal water consumption.

### TRANSPORTATION: ON-ROAD VEHICLES

**Community Inventory:** The community inventory includes emissions from all on-road motor vehicles, using vehicle miles traveled (VMT) data for trips occurring within the city, along with a portion of regional VMT where trips originate or end within the city.

**Municipal Inventory:** On-road vehicle emissions for the Municipal Inventory includes emissions from both employee work commute trips and operations of City-owned vehicles in the City's vehicle fleets. City fleets included gasoline and diesel fuel vehicles.

- Data and Methods: On-road vehicle emission factors for both the community and municipal inventories were calculated from CARB's 2014 EMissions FACtor (EMFAC) model based on 2014 emissions data for Sacramento County.
- ▲ For the Community Inventory, annual on-road VMT, by speed bin (e.g., zero to five miles per hour, five to ten miles per hour) were obtained for baseline conditions from the project traffic consultants (DKS 2016) for the entire city. The baseline VMT data were adjusted using the Senate Bill (SB) 375 Regional Targets Advisory Committee's (RTAC's) origin-destination method, which includes:
  - ▼ 100 percent of VMT associated with trips that both begin and end within the city limits;
  - ▼ 50 percent of VMT associated with trips that either begin or end in the city limits but travel outside the city limits; and.
  - O percent of VMT associated with "pass-through" trips that have neither an origin nor a destination in the city limits.
  - Emission factors were derived by speed bin category and applied to the VMT provided by speed bin. It should be noted that VMT data was provided for year 2015, which is inconsistent with the baseline year of 2014. However, this was the best available VMT data and any differences would be minimal between 2014 and 2015; thus, 2015 data are adequate for characterizing baseline conditions for purposes of the GHG emissions inventory.

- ✓ For the municipal employee commute-related emissions, emission factors were calculated based on emissions associated with passenger auto- and light-duty vehicles. The City provided residential zip codes for all City employees, which were used to estimate round-trip commute distances. All employees were assumed to be full-time and travel to and from work each day of the week. Average City holiday and vacation time was calculated based on current City job posting data and used to discount annual worker commute trips.
- City-owned on-road vehicle fleet data (e.g., make, model, annual mileage and fuel consumption) was provided by the City. EMFAC vehicle classifications were assigned to individual vehicles and a fleetspecific emission factor was calculated based on the assigned classifications. Emission factors were derived for diesel and gasoline vehicles separately.

### OFF-ROAD VEHICLES AND EQUIPMENT

**Community Inventory:** The Community Inventory includes emissions associated with all off-road and stationary equipment within the city.

**Municipal Inventory:** The municipal inventory includes emissions associated with off-road vehicles and stationary equipment owned and operated by the City.

- Data and Methods: for the Community Inventory, off-road vehicle emissions were estimated from CARB's OFFROAD 2007 model for Sacramento County and scaled to the City by population or work force (depending on the sector type). Off-road emissions associated with airport ground support and oil drilling were also removed as these activities do not occur within the city (DrillingMaps 2016).
- ▲ For the Municipal Inventory, off-road mobile and stationary equipment data owned by the City were provided by the City. Emissions were estimated using 2014 Climate Registry Emission Factors for diesel and gasoline off-road vehicles/equipment.

### HIGH GWP GASSES

**Community Inventory**: The Community Inventory includes an estimate of high-GWP gas emissions, including sulfur hexafluoride (SF<sub>6</sub>), sulfuryl fluoride (SO<sub>2</sub>F<sub>2</sub>), hydrofluorocarbons (HFCs), perfluorinated compounds (PFCs), and perfluoroethane (PFEs). These emissions were not scaled to the municipal level.

**Data and Methods:** Emissions associated with high-GWP gases were scaled on a per capita basis from the State's emission inventory (CARB 2016).

## 2.1 SUMMARY OF BUSINESS AS USUAL AND LEGISLATIVE-ADJUSTED GHG EMISSIONS

Business-as-usual (BAU) emissions forecasts provide an assessment of how emissions would change over time without further action from federal, State, or local regulation. These forecasts provide the City with the information needed to focus efforts on certain emissions sectors and sources that have the most GHG reduction opportunities.

Legislative-adjusted forecasted emissions account for anticipated changes in future vehicle emissions factors and electricity emissions factors due to State and federal policies that would occur with or without City action, which can be referred to as "legislative adjustments" to the BAU forecasts. These actions are reflected in forecasted emissions factors either provided by SMUD or assumed in EMFAC 2014.

The selected future milestone years of 2020, 2030, and 2050 are based on the State's GHG reduction target years (i.e., 2020 and 2030) and long-term goal (i.e., 2050), established in key State legislation and policies, including Assembly Bill (AB 32), Senate Bill 32 (SB 32), Executive Order B-30-15, and Executive Order S-3-05. GHG emissions were also forecasted to 2035, consistent with the 2035 General Plan buildout year. GHG reductions related to proposed policies and programs contained in the 2035 General Plan were also estimated for the year 2035; thus, forecasted emissions in 2035 for legislative-adjusted BAU conditions in 2035 are necessary to understand the scale of local reductions that would need to be achieved by the 2035 General Plan to make further progress towards achieving consistency with longer-term statewide goals. See discussion in Section 3 for more details regarding general plan buildout and proposed policies and programs.

Table 3 and Table 4 show forecasted GHG emissions for BAU conditions with legislative adjustments applied, for community and municipal operations, respectively. Figure 1 and Figure 2 depict the legislative-adjusted forecasts and BAU forecasts, in comparison with the recommended GHG reduction targets (discussed in Section 2.3) for community and municipal operations, respectively.

Table 3 2014 City of Folsom Community GHG Emissions Inventory and Legislative-Adjusted BAU Forecasts (MTCO₂e/year)

Sectors	2014	2020	2030	2035	2050
Building Energy Use	235,955	238,335	221,661	234,787	281,736
On-Road Vehicles	342,865	317,361	279,019	279,867	325,871
Off-Road Vehicles	26,683	29,417	34,611	37,542	47,911
Solid Waste	13,073	14,410	16,949	18,382	23,447
Water-Related	1,325	1,381	1,212	1,277	1,628
Wastewater	3,282	3,529	3,708	4,576	5,877
High GWP Gases	34,708	31,956	37,586	40,762	51,996
Total	657,892	636,389	594,745	617,192	738,467
Percent Change from 2014 (%)	0	-3	-10	-6	12

Notes: GHG = greenhouse gas; GWP = global warming potential; MTCO<sub>2</sub>e = metric tons of carbon dioxide equivalent; yr = year.

Table 4 2014 City of Folsom Municipal Operations GHG Emissions Inventory and Legislative-Adjusted Forecasts (MTCO<sub>2</sub>e/year)

Sectors	2014	2020	2030	2035	2050
Building Energy Use	2,137	2,200	2,070	2,196	2,641
On-Road Vehicles	4,247	4,548	5,052	5,491	6,958
Off-Road Vehicles	138	152	179	194	247
Solid Waste	71	78	92	100	128
Traffic Signals	101	105	92	100	128
Street Lights	727	756	665	721	919
Water-Related	15	15	14	15	19
Wastewater	33	34	32	36	46
Total	7,469	7,889	8,196	8,852	11,086
Percent Change from 2014 (%)	0	6	10	19	48

Notes: GHG = greenhouse gas; GWP = global warming potential; MTCO<sub>2</sub>e = metric tons of carbon dioxide equivalent; yr = year.

Source: Data compiled by Ascent Environmental in 2016.

## 2.2 ASSUMPTIONS AND FORECAST METHODS

Estimated BAU and legislative-adjusted emissions forecasts were based on predicted growth in existing demographic units, including population, jobs, and household growth between 2014 and 2050 for Folsom, as shown in Table 5 below. To forecast GHG emissions in future years, different methods were used depending on the emissions sector. For example, residential building energy emissions were scaled using housing unit forecasts. Emissions from the mobile-sector were based on VMT growth projections and transportation modeling for the 2035 General Plan, based on Sacramento Area Council of Government (SACOG) land use and growth forecasts. Population, housing, and employment projections used to estimate future GHG emissions are shown below in Table 5.

Table 5 City of Folsom Demographic Forecasts

Input	2014	2020	2030	2035	2050	Change from 2014
Population	73,334	80,833	95,074	103,110	131,526	58,192 (79%)
Household Units	26,192	29,201	35,004	38,324	50,297	24,105 (92%)
Employment	34,800	38,368	45,145	48,970	62,502	27,702 (80%)
Municipal Employees	399	440	517	561	716	317 (79%)

Source: Mintier Harnish 2017

The forecast assumptions and methods used for each sector are described below in Table 6, including applicable legislative reductions applied.

Table 6	Scaling Factors and Legislative Reductions used to Forecast Emissions
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Sector	Scaling Factor	Applied Legislative Reductions
Residential Electricity	Housing units	Accounts for 2016 Title 24 energy efficiency gains for new construction. Applies reductions in SMUD CO <sub>2</sub> emissions factors based on achieving 33 percent RPS by 2020 and 50 percent RPS by 2030.
Residential Natural Gas	Housing units	Accounts for 2016 Title 24 energy efficiency gains for new construction.
Commercial, Industrial, Municipal Electricity	Employment	Accounts for 2016 Title 24 energy efficiency gains for new construction. Applies reductions in SMUD $CO_2$ emissions factors based on achieving 33 percent RPS by 2020 and 50 percent RPS by 2030.
Commercial, Industrial, Municipal Natural Gas	Employment	Accounts for 2016 Title 24 energy efficiency gains for new construction.
On-Road Vehicles	Project-Specific VMT₁	Applied EMFAC emission factors account for legislative reductions from Advanced Clean Cars, Pavley Clean Car Standards, Tractor-Trailer Greenhouse Gas Regulation, and adopted fuel efficiency standards for medium- and heavy-duty vehicles
Off-road vehicles	Population and Labor Force <sub>2</sub>	None
Solid waste	Population	No legislative reduction applied. See Solid Waste measures in Section 3 below.
Water-related	Population	Emissions associated with electricity use at the wastewater treatment plant were reduced based on SMUD achieving 33 percent RPS by 2020 and 50 percent by 2030. No legislative reductions were applied to process emissions.
Wastewater	Population	Emissions associated with electricity use at the water treatment plant were reduced based on SMUD achieving 33 percent RPS by 2020 and 50 percent by 2030.
High GWP Gases	Population	Assumes federal ban on refrigerants with GWP higher than 2,500. Assumes that refrigerants would have a GWP no higher than 2,500 starting from 2020.
City Traffic Signals	Municipal Employment	Emissions associated with electricity use were reduced based on SMUD achieving 33 percent RPS by 2020 and 50 percent by 2030.
City Street Lights	Municipal Employment	Emissions associated with electricity use were reduced based on SMUD achieving 33 percent RPS by 2020 and 50 percent by 2030.

Notes: SMUD= Sacramento Municipal Utility District; RPS= Renewable Portfolio Standard; VMT=Vehicle Miles Traveled.

<sup>1.</sup> Project-specific VMT was provided by DKS (2017) for existing conditions (2015) and consistent with travel demand modeling and SACOG projections for 2036. Based on the 2036 VMT for Folsom, VMT was interpolated for al target years.

Different sub-sectors of the off-road sector were scaled based on population or labor force, depending on the sector. For example, construction equipment was scaled by labor force and lawn and garden household equipment was scaled by population. For more details refer to the Off-Road sector calculation sheet.

## 2.3 GREENHOUSE GAS EMISSIONS REDUCTION TARGETS

GHG reduction targets were developed for 2020 <u>and</u> 2030, <del>2035;</del> and <del>a</del> longer-term GHG reduction goals was were identified for <u>2035 and</u> 2050. The targets were developed using different methods for the Community and Municipal inventories.

The community emissions targets and goal were based on per capita emission recommendations outlined in California's 2017 Climate Change Scoping Plan ([2017 Scoping Plan], CARB 2017). The 2017 Scoping Plan suggests that annual GHG emissions limits of no more than 6 metric tons of carbon dioxide equivalents per capita per year (MTCO<sub>2e</sub>/capita/year) for 2030 and 2 MTCO<sub>2</sub>e/capita/year for 2050 be used. The 2035 per capita emissions limit goal was interpolated from the 2030 and 2050 to 4.6 MTCO<sub>2</sub>e per capita. No per capita emissions limit is recommended for 2020. Thus, the target for 2020 was based on achieving a mass emissions level equivalent to the percent reduction in statewide emissions needed to meet State mass emission targets. For Folsom, this represents a 2.4 percent reduction from 2014 emissions. For all target years/long-term goals, mass emissions limits levels were calculated based on the target future year per capita limit and associated forecasted Folsom population for that year.

The municipal emissions reduction targets <u>and long-term goals</u> were established using a percent reduction target below baseline 2014 emissions. These percent reduction <u>targets levels</u> (i.e., 2.4 percent by 2020, 40.2 percent by 2030, and 77.7 percent by 2050) are equivalent to the percent reduction in statewide emissions needed to meet State mass emission targets set by CARB in comparison to 1990 emission levels. Based on these established statewide targets, a 2035 emissions <u>limit goal</u> was interpolated to show the City's progress at General Plan buildout. The 2035 <u>target goal</u> equates to a 53 percent reduction in emissions from the 2014 baseline.

Targets <u>and long-term goals</u> for the community and municipal inventories are shown below in Table 7, and depicted graphically below in Figure 1 for the Community Inventory and Figure 2 for the Municipal Inventory as a bolded line.

Table 7 Greenhouse Gas Emissions Reduction Targets by Year

Applicable Inventory	Target Year Targets (years 2020 and 2030) and Long-Term Goals (years 2035 and 2050) <sup>1</sup>					
	2020	2030	2035	2050		
Community GHG Reduction Targets/Goals1						
Per Capita Targets/Goals (MTCO2e/capita/year)1	NA	6	4.6	2		
Mass Emissions Targets/Goals (MTCO2e/year)1	642,246	570,447	470,080	263,052		
Municipal GHG Reduction Targets/Goals1						
Mass Emissions Targets/Goals (MTCO2e/year)1	7,291	4,468	3,511	1,663		

Notes: GHG= greenhouse gas; MTCO<sub>2</sub>e= = metric tons of carbon dioxide equivalent; NA= not applicable

<sup>1:</sup> GHG emissions targets are set based on established State-mandated GHG emissions limits for years 2020 and 2030 by AB 32 and SB 32, respectively. Goals are used to represent long-term GHG levels for years beyond what is currently mandated by law. Goals are provided for informational purposes only and show anticipated GHG emissions for future years (2035 and 2050).

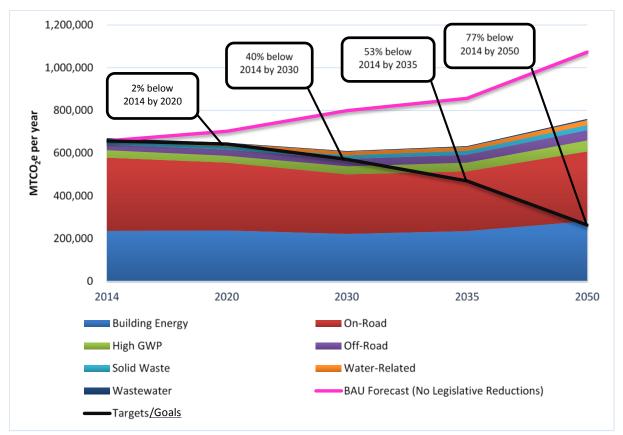


Figure 1: Community Inventory BAU Forecast, Legislative-Adjusted Forecast, and Targets

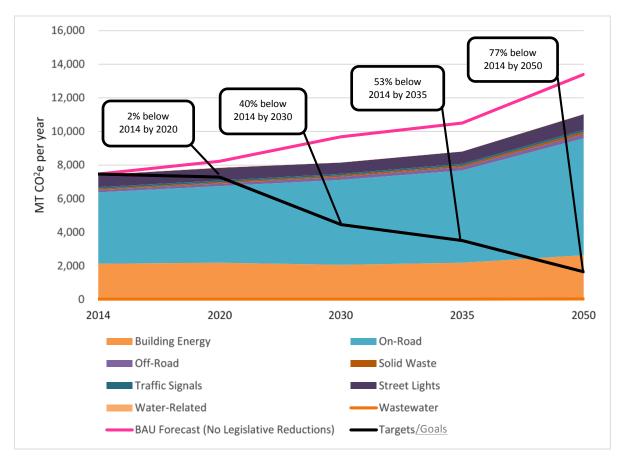


Figure 2: Municipal Operations Inventory BAU Forecast, Legislative-Adjusted Forecast, and Targets

As shown above, with legislative adjustments alone, 2020 emissions targets would be met for both the community and municipal operations. In contrast, while legislative reductions would help to reduce emissions beyond 2020, neither the recommend targets for 2030 or 2035 nor the longer-term 2035 and 2050 goals would be met for both the community and municipal operations. Additional GHG reductions from locally-based actions would be needed. Proposed GHG reduction measures to meet the targets are presented below in Section 3.

As shown above, forecasted emissions do not meet emissions limits for future years. To reduce emissions and meet future targets, the City of Folsom can take action through the proposed 2035 General Plan to adopt or update land use plans, enforce or update City ordinances, adjust municipal operations, encourage or incentivize residents and business by partnering with local organizations, and work with local and regional transportation planning or other agencies that provide services or maintain infrastructure that is not directly in the City's control. The City can effectively reduce emissions in some sectors where they have jurisdictional control (e.g., municipal operations, land use change), but in some cases the City has limited ability to influence reductions because the City has limited jurisdictional control (e.g., on-road transportation).

To determine the GHG reductions required to achieve the community and municipal operations targets in the future, the mass emissions limits (based on per capita targets) were subtracted from the legislative-adjusted forecasts. The local GHG reductions required to achieve the targets/goals (beyond what is already included in the legislative-adjustments to the emissions forecasts) is referred to as the "gap", shown below in Table 8 by year. The effective "gap" needs to be closed in each target year, in order for the City to meet the GHG reduction targets/goals.

Table 8 **GHG Emissions Reduction Targets by Year** 

Applicable Inventory		GHG Emissions (MTCO₂e/year)					
Applicable Inventory	2020 <u>1</u>	2030 <sup>1</sup>	2035 <sup>1</sup>	2050 <u>1</u>			
	Community Emissions	5					
Mass Emissions (legislative-adjusted BAU)	636,389	594,745	617,192	738,467			
Mass Emissions Reduction Targets/Goals1	642,246	570,447	470,080	263,052			
Gap (surplus)	(5,857)	24,299	147,112	475,415			
	Municipal Emissions						
Mass Emissions (legislative-adjusted BAU)	7,889	8,196	8,852	11,086			
Mass Emissions Targets/Goals1	7,291	4,468	3,511	1,663			
Gap (surplus)	(598)	3,728	5,342	9,423			

Notes: GHG= greenhouse gas; MT= metric tons; CO<sub>2</sub>e= carbon dioxide equivalent; NA= not applicable

As shown above, both the Community and the City's Municipal Operations are expected to meet the 2020 targets with a surplus of GHG emissions due to legislative reductions, with no further local action needed. All future years beyond 2020 would require additional local GHG reductions from local measures to meet the targets/goals. Based on the proposed land use designations, and proposed policies and programs contained in the 2035 General Plan policy document, GHG reductions were quantified, where appropriate. Revisions and additions to policies and programs were made, where necessary, to ensure that the proposed General Plan will put the City on a path to achieve GHG reductions to meet 2030 statewide emissions limits. These reductions were applied to the legislative adjusted forecasts to meet 2030 targets. Note that in some cases, several policies would be implemented by an implementation program with specific performance targets related to achieving the GHG reductions. In this case GHG reductions were quantified based on the implementation program and policies were grouped accordingly. In other cases, an individual policy was

<sup>1:</sup> GHG emissions targets are set based on established State-mandated GHG emissions limits for years 2020 and 2030 by AB 32 and SB 32. respectively. Goals are used to represent long-term GHG levels for years beyond what is currently mandated by law. Goals are provided for informational purposes only and show anticipated GHG emissions for future years (2035 and 2050).

revised or recommended with specific performance standards for which GHG reductions were quantified. All policies and programs were further grouped into categories by GHG emissions sector.

GHG reductions associated with all recommended measures were calculated in a step-wise manner for the future years of 2020, 2030, 2035, and 2050. In other words, GHG reductions (in MTCO<sub>2</sub>e/year) are assessed during a snapshot in time in years 2020, 2030, 2035, and 2050. This is a simplified method of characterizing GHG reductions, which would more realistically occur on a continuous basis. However, a step-wise method is appropriate for a planning-level document because the City's GHG reduction targets and monitoring of CAP implementation progress would be tied to these future years.

Importantly, GHG emissions reductions were quantified for measures wherever substantial evidence and reasonable assumptions were available to support calculations. Numerous programs and policies were not quantifiable for various reasons, such as the need to avoid double-counting VMT reductions already accounted for in future VMT projections, lack of substantial data on effectiveness of a measure, or infeasible assumptions that would be required to apply a measure. For example, VMT-reducing measures such as improvements to transit or new transit services have been accounted for in the future VMT projections based on transportation modeling for the 2035 General Plan; therefore, no additional transit-related GHG reduction measures were quantified. It was determined that relying further on additional new transit services (beyond what is already included in the adopted SACOG MTP/SCS and planned for the City of Folsom) to provide additional GHG reductions could not be substantiated because new transit services require adequate funding and demand which could not be determined or relied upon at this time.

Estimates of GHG emissions reductions associated with all local GHG reduction measures and legislative-adjusted emissions, along with an estimated emissions reduction "gap", are summarized below in Table 9. Detailed measure descriptions, calculations, and assumptions supporting the GHG reduction estimates are provided in Attachment 1. A summary of how each CAP measure would be implemented by 2035 General Plan policies and programs is shown in Attachment 1.

	· • · · · · · · · · · · · · · · · · · ·					
General Plan Location	GHG Reduction Measure	GHG Reductions (MTCO₂e/year)				
General Flan Location	Grid Neduction Measure	2020	2030	2035	2050	
Building Energy Sector						
NCR 3.2.3, LU 9.1.10, LU 1.1.13, LU 1.1.17, Program PFS-25, Program LU-6	E-1: Improve Building Energy Efficiency in New Development	262	1,501	2,171	4,048	
PFS 8.1.9, Program PFS-23	E-2: Water Heater Replacement in Existing Residential Development	0	1,326	1,856	1,856	
PFS 8.1.5, PFS 8.1.4, Program PFS-24	E-3: Improve Building Energy Efficiency in Existing Development	48	574	623	623	
PFS 8.1.3, Program PFS-24	E-4: Increase Use of Renewable Energy in Existing Development	1,844	3,328	3,325	3,324	
PFS 8.1.7	E-5: Improve Energy Efficiency in City-Owned Facilities	388	876	1,180	1,847	
PFS 8.1.3, Program PFS-22	E-6: Increase use of Renewable Energy in City-Operated Facilities	79	264	310	310	
Building Energy Sector: Commu	nity Subtotal	2,622	7,868	9,466	12,008	
Building Energy Sector: Municip	al Subtotal	467	1,140	1,490	2,157	
Transportation Sector						
LU 3.1.1, LU 3.1.5, LU 3.1.6, LU 4.1.2, LU 4.1.3, NCR 3.1.3	T-1: Reduce VMT Through Mixed and High-Density Land Use	2,038	3,722	4,373	3,869	
M 2.1.15, M 1.1.4, M 1.1.6, M 1.1.5, M 2.1.2, M 2.1.3, M 2.1.4, Program M-8	T-2: Improve Streets and Intersections for Multi-Modal Use and Access	0	268	431	486	
M 1.1.9, NCR 3.1.3, Program M-1	T-3: Adopt Citywide TDM	0	575	877	900	
M 1.1.9, NCR 3.1.3, Program M-1	T-4: Adopt TDM For City Employees	0	167	263	424	
M 4.2.1, M 4.2.2, M 4.2.3, Program M-11	T-5: Reduce Minimum Parking Standards	0	82	125	699	
NCR 3.2.7, Program PFS-26	T-6: Require the Use of High-Performance Renewable Diesel in Construction Equipment	0	5,116	22,196	28,330	
PFS 8.1.8, Program PFS-14	T-7: Alternative Fuel in City Fleet	0	2,874	4,824 4,042	6,148 5,150	
M 1.1.10, M 4.2.4, M 6.1.3, Program M-3, Program M-4	T-8: Install Electric Vehicle Charging Stations	0	4,243	5,949	5,949	
Transportation Sector: Commun	ity Subtotal	2,038	17,048	39,038 38,256	46,805 45,806	
Transportation Sector: Municipa	l Subtotal	0	3,109	<del>5,314</del> <u>4,531</u>	<del>6,852</del> <u>5,853</u>	
Solid Waste		•	•	•	•	
PFS 9.1.3, Program PFS-18, Program PFS-19, Program PFS-20, Program PFS-21	SW-1: Increase Solid Waste Diversion	4,674	7,787	10,930	13,942	
PFS 9.1.3, Program PFS-18,	SW-2: Divert Organic Waste from Landfills	1,606	4,005	4,471	5,541	

Table 9 Summary of Greenhouse Gas Emissions Reduction Measures Performance

Constal Distriction	CLIC Deduction Massure	GHG Reductions (MTCO <sub>2</sub> e/year)				
General Plan Location	GHG Reduction Measure	2020	2030	2035	2050	
Program PFS-19, Program PFS-20, Program PFS-21						
Solid Waste Sector: Community	Subtotal	6,279	11,793	15,400	19,482	
Solid Waste Sector: Municipal S	ubtotal	25	42	59	76	
Water and Wastewater						
PFS 3.1.3, PFS 3.1.9, Program PFS-27	W-1: Increase Water Efficiency in New Residential Development	0	1	1	3	
PFS 3.1.3, PFS 3.1.9, Program PFS-27	W-2: Reduce Outdoor Water Use	0	293	309	394	
PFS 3.1.3, PFS 3.1.9, Program PFS-27	W-3: Reduce Potable Water Consumption at City Facilities	416	357	360	487	
Water and Wastewater: Community Subtotal		416	652	671	884	
Water and Wastewater: Municipal Subtotal		416	357	360	487	
	Total GHG Emissions Reductions					
	Community Total	11,355	37,360	64,575 63,793	79,179 78,181	
	Municipal Total	908	4,649	<del>7,224</del> <u>6,441</u>	<del>9,572</del> <u>8,573</u>	
Con	nmunity GHG Reduction Target and Gap					
	GHG Emissions Reduction Target	5,857	24,299	147,112	475,415	
Gap (Surplus)		(17,212)	(13,061)	82,537 83,320	396,236 39,7235	
Mu	nicipal GHG Reduction Target and Gap					
	GHG Emissions Reduction Target	598	3,728	5,342	9,423	
	Gap (Surplus)	(310)	(921)	( <del>1,882</del> ) ( <u>1,009</u> )	<del>(149)</del> <u>850</u>	

Notes: MT= metric tons; CO₂e= carbon dioxide equivalents; GHG= greenhouse gas; VMT=vehicle miles traveled; TDM= traffic demand management; ZNE = zero net energy

Source: Modeled by Ascent Environmental, Inc. 2017.

### 3.1 STREAMLINING GHG ANALYSIS FOR SUBSEQUENT PROJECTS

As shown above in Table 9, GHG reduction measures have been incorporated into the 2035 GPU as policies and implementation programs. Some of the measures would result in GHG reductions associated with land use development patterns and others from actions taken by the City and/or other local agencies. Further, some GHG reduction measures could apply to future development projects subject to CEQA review that could choose to incorporate the measures into project designs or conditions of approval, consistent with the 2035 GPU policies and programs and the CAP identified in this Technical Appendix. As such, some projects would be eligible for CEQA streamlining and tiering for project-level GHG analysis, pursuant to criteria identified in CEQA Guidelines Section 15183.5.

The specific GHG reduction measures identified in Table 9 that would typically apply to projects seeking streamlining of GHG analysis are summarized below.

- ▲ E-1: Improve Building Energy Efficiency in New Development
- T-2: Improve Streets and Intersection for Multi-Modal Use and Access
- ▲ T-5: Reduce Minimum Parking Standards
- T-8: Install Electric Vehicle Charging Stations
- W-1: Increase Water Efficiency in New Residential Development
- W-2: Reduce Outdoor Water Use

In addition to the above-referenced GHG reduction measures, General Plan Policy NCR 3.2.8 describes the general process and criteria by which the City will administer review of subsequent projects for consistency with the CAP and associated GHG measures incorporated into the General Plan and EIR, pursuant to CEQA Guidelines Section 15183.5.

General Plan Policy NCR 3.2.8: Streamlined GHG Analysis for Projects Consistent with the General Plan Projects subject to environmental review under CEQA may be eligible for tiering and streamlining the analysis of GHG emissions, provided they are consistent with the GHG reduction measures included in the General Plan and EIR. The City may review such projects to determine whether the following criteria are met:

- Proposed project is consistent with the current general plan land use designation for the project site;
- Proposed project incorporates all applicable GHG reduction measures (as documented in the Climate Change Technical Appendix to the General Plan EIR) as mitigation measures in the CEQA document prepared for the project; and,
- Proposed project clearly demonstrates the method, timing and process for which the project will comply with applicable GHG reduction measures and/or conditions of approval, (e.g., using a CAP/GHG reduction measures consistency checklist, mitigation monitoring and reporting plan, or other mechanism for monitoring and enforcement as appropriate).

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- Climate Registry. 2014 (April). 2014 Climate Registry Default Emission Factors. Available: http://www.theclimateregistry.org/wp-content/uploads/2014/11/2014-Climate-Registry-Default-Emissions-Factors.pdf. Accessed: March 10, 2015.
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- Mintier Harnish. 2017. Folsom GPU Population Forecasts. Email correspondence on August 14, 2017 between Chelsey Payne (Mintier Harnish) and Dimitri Antoniou (Ascent Environmental).
- Pacific Gas & Electric (PGE). 2015. Community Wide GHG Inventory Report for Folsom 2005 to 2015.
- Sacramento Municipal Utility District (SMUD). 2014. 2014 AB 32 Water-Energy assessment and savings demonstration project. Prepared by GEI Consultants.
- \_\_\_\_\_. 2016. SMUD CY2014 Greenhouse gas emissions reported to the Climate Registry. Personal communication from Martha Helek (SMUD) to Dimitri Antoniou (Ascent Environmental). Email June 28<sup>th</sup>, 2016.
- U.S. Environmental Protection Agency. 2012 (October). eGRID 2012 Summary Tables. Available: https://www.epa.gov/energy/egrid-2012-summary-tables. Accessed June 27<sup>th</sup>, 2016.
- San Juan Water District. 2016. Water consumption for the City of Folsom. Tony Barela (SJWD) to Dimitri Antoniou (Ascent Environmental). Phone conversation

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# **Attachment 1**

**Greenhouse Gas Emission Reductions Calculations and Assumptions** 

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## **GHG Measure Reduction Summary**

GHG Emission Reductions by Category						
	Annual GHG Reduction (MT CO <sub>2</sub> e)					
Category	2020	2030	2035	2050		
Built Environment and Transportation	2,038	17,048	38,256	45,806		
Energy	2,622	7,868	9,466	12,008		
Solid Waste	6,279	11,793	15,400	19,482		
Water and Wastewater	416	652	671	884		
TOTAL Reductions from Proposed Measures	11,355	37,360	63,793	78,181		
Emissions Gap: Needed reductions to meet CAP Targets after GHG Reduction Measures have been applied (MT CO <sub>2</sub> e) (Surplus)	-17,212	-13,061	83,320	397,235		

Projections with Legislative Reductions								
	Annual GHG Emissions (MT CO <sub>2</sub> e)							
Category	2014	2020	2030	2035	2050			
Built Environment and Transportation	404,256	378,734	351,216	358,172	425,778			
Energy	235,955	238,335	221,661	234,787	281,736			
Solid Waste	13,073	14,410	16,949	18,382	23,447			
Water and Wastewater	4,607	4,910	4,920	5,852	7,506			
TOTAL Emissions with Legislative Reductions	657,892	636,389	594,745	617,192	738,467			
Projected Percent Reduction fron	n 2014	-3.3%	-9.6%	-6.2%	12.2%			
Per Capita Target (MT CO2e/ca	pita)	NA	6	4.6	2			
CAP Targets (MT CO <sub>2</sub> e)		642,246	570,447	470,080	263,052			
Needed reductions to meet CAP Targets from 2014 levels (MT CO <sub>2</sub> e)		15,646	87,445	187,812	394,840			
Needed reductions to meet CAP Targets from Legislative reductions (MT CO <sub>2</sub> e) (Surplus)		-5,857	24,299	147,112	475,415			
TOTAL BAU Emissions	657,892	702,774	799,201	856,813	1,073,197			

Projections with Legislative Reductions and City CAP Measures									
Catagomi	Annual GHG Emissions (MT CO₂e)								
Category	2014	2020	2030	2035	2050				
Built Environment and Transportation	404,256	376,696	334,168	319,916	379,972				
Energy	235,955	235,713	213,793	225,321	269,728				
Solid Waste	13,073	8,131	5,156	2,981	3,965				
Water and Wastewater	4,607	4,494	4,268	5,182	6,621				
TOTAL	657,892	625,034	557,385	553,400	660,287				
Percent below 2014	-5%	-15%	-16%	0%					
Additional Reductions Needed to meet CAP To (Surplus)	-17,212	-13,061	83,320	397,235					

GHG Measure Reduction Summary									
GHG Emission Reduction	GHG Emission Reductions by Category								
		al GHG Redu	ction (MT C	O <sub>2</sub> e)					
Category	2020	2030	2035	2050					
Built Environment and Transportation	0	3,109	4,531	5,853					
Energy	467	1,140	1,490	2,157					
Solid Waste	25	42	59	76					
Water and Wastewater	416	357	360	487					
TOTAL Reductions from Proposed Measures	908	4,649	6,441	8,573					
Emissions Gap: Needed reductions to meet CAP Targets after GHG Reduction Measures have been applied (MT CO₂e) (Surplus)	-310	-921	-1,099	850					

Projections with Legislative Reductions							
	Annu	ıal GHG Emissio	ons (MT CO <sub>2</sub> e)				
Category	2014	2020	2030	2035	2050		
Built Environment and Transportation	5,213	5,561	5,988	6,506	8,252		
Energy	2,137	2,200	2,070	2,196	2,641		
Solid Waste	71	78	92	100	128		
Water and Wastewater	47	50	46	51	65		
TOTAL Emissions with Legislative Reductions	7,469	7,889	8,196	8,852	11,086		
Projected Percent Re	duction from 2014	6%	10%	19%	48%		
CAP Targets (adjusted for per	cent reduction from 2014)	2%	40%	53%	78%		
CAP Targets	(MT CO <sub>2</sub> e)	7,291	4,468	3,511	1,663		
	Needed reductions to meet CAP Targets from 2014 levels (MT ${\rm CO_2e}$ )			3,958	5,805		
Needed reductions to meet C reductions (MT C	0	598	3,728	5,342	9,423		
TOTAL BAU Emissions	7,469	8,232	9,683	10,501	13,395		

Projections with Legislative Reductions and City CAP Measures										
Catagomi	Annu	al GHG Emission	ons (MT CO <sub>2</sub> e)	)						
Category	2014	2020	2030	2035	2050					
Built Environment and Transportation	5,213	5,561	2,879	1,975	2,400					
Energy	2,137	1,733	930	706	484					
Solid Waste	71	53	50	41	52					
Water and Wastewater	47	-366	-311	-309	-422					
TOTAL 7,469		6,981	3,547	2,411	2,513					
Percent below 2014		-7%	-53%	-68%	-66%					
Additional Reductions Needed to me (Surplus)	-310	-921	-1,099	850						

	t and Transportation					Annual GHG Red	uction (MT CO <sub>2</sub> e)	
AP Measure	GP Policy/Program	Category	Measure Title	Description	2020	2030	2035	2050
	211215			Brief Description: Applies GHG reductions associated with reduction in vehicle miles traveled (VMT) from development in mixed use nodes and near transit.				
T-1	LU 3.1.1, LU 3.1.5, LU 3.1.6, LU 4.1.2, LU 4.1.3, NCR 3.1.3	Built Environment and Transportation	Reduce VMT Through Mixed and High Density Land Use	Detailed Assumptions: Focus growth in the TOD/Mixed Use Area. This measure applies reductions in VMT associated with high-density housing development in mixed-use and TOD areas of the City.  Applies CAPCOA LUT-9 to population associated with land use designations: MLD, MMD, MHD, MU, EBC, HF.	2,038	3,722	4,373	3,869
	M 2.1.15, M 1.1.4, M			Brief Description: Sets goal for City to improve existing intersections/streets and requires future development to include pedestrian and bicycle amenities in streets and intersections.				
Т-2	1.1.6, M 1.1.5, M 2.1.2, M 2.1.3, M2.1.4, Program M-8	Built Environment and Transportation	Improve Streets and Intersections for Multi-Modal Use and Access	Detailed Assumptions: Improve intersections/streets to provide multi modal transportation/access:  Amended Program M-8 to set a goal for the City to improve 30 percent of all roadways/intersections in existing and new development by 2035. Applies CAPCOA SDT-2 for rural context. Reduces VMT and short trips due to increases in pedestrian/bicycle amenities and connections. Measure applies  Citywide and assumed 30 percent of intersections/streets have pedestrian/bicycle improvements.	0	268	431	486
				Brief Description: Implement citywide TDM				
T-3	M 1.1.9, NCR 3.1.3, M-1	Built Environment and Transportation	Adopt Citywide TDM	<u>Detailed Assumptions:</u> Reduce commute VMT in new residential and non-residential development by 15 percent over <u>baseline year (2014) VMT</u> by 2035. Applies CAPCOA TRT-1, TRT-2, TRT-3 to all new VMT in City (excluding city employees)	0	575	877	900
				Brief Description: Implement TDM for city employees				
T-4	M 1.1.9, NCR 3.1.3, Program M-1	Built Environment and Transportation	Adopt TDM For City Employees	Detailed Assumptions: Reduce City employee commute Vehicle Miles Traveled (VMT) by 20 percent over baseline year (2014) VMT by 2035. Applies CAPCOA TRT-1, TRT-2, TRT-3 to all VMT associated with City employees.	0	167	263	424
				Brief Description: Reduces minimum parking requirements.				
T-5	M 4.2.1, M4.2.2, M 4.2.3, Program M-11	Built Environment and Transportation	Reduce Minimum Parking Standards	<u>Detailed Assumptions:</u> Requires that the City reduce parking minimums by 5 percent in new land use development, especially in commercial districts, mixed-use, TOD zones, and high density areas.  Applied CAPCOA PDT-1 to new VMT citywide.	0	82	125	699
				Brief Description: Phases in requirements for use of high-performance renewable diesel in construction equipment.				
T-6	NCR 3.2.7, Program PFS-26	Built Environment and Transportation/ Off-road	Require the Use of High-Performance Renewable Diesel in Construction Equipment	<u>Detailed Assumptions:</u> Requires new residential and non-residential construction projects in the City to use alternative diesel: 100 percent by 2035. High Performance Renewable Diesel, results in no net increase in anthropogenic GHG emissions as diesel is produced from 100 percent biogenic sources.	0	5,116	22,196	28,330
				Brief Description: Requires City on-road fleet conversion to alternative fuel and use of high-performance renewable diesel.				
Т-7	PFS 8.1.8, Program PFS-14	Built Environment and Transportation	Alternative Fuel in City Fleet	<u>Detailed Assumptions:</u> Assumes 100 percent of City-owned onroad diesel fleet would be using High Performance Renewable Diesel by 2035. The use of High Performance Diesel does not require any modifications to existing engines. Measure also requires that 100 percent of city-owned onroad gasoline vehicles ( <u>excluding fire and police, equivalent to 61 percent of total fleet)</u> would be replaced with electric vehicles by 2035.	0	2,874	4,042	5,150
				Brief Description: Installation of electric vehicle charging stations throughout city in commercial,				
Т-8	M 1.1.10, M 4.2.4, M 6.1.3, Program M-3 and M-4	Built Environment and Transportation	Install Electric Vehicle Charging Stations	Detailed Assumptions: Sets a target for the City to install 10 percent increase over the current population of EV's in Folsom by 2035. This results in the needed installation of 560 charging stations. A portion of the GHG reductions associated with this measure were attributed to the Municipal Operations inventory, assuming the City would install one percent of the 560 stations (i.e., 6) on City-	0	4,243	5,949	5,949
				owned facilities				
					2,038	17,048	38,256	45,806

Community Total	2,038	17,048	38,256	45,806
Muni Total	0	3,109	4,531	5,853

olid Waste Meas	sures								
CAP Measure	GP Cotocomi		Measure Title	Description	Annual GHG Reduction (MT CO₂e)				
CAP ivieasure	Policy/Program	Category	ivieasure ritie	Description	2020	2030	2035	2050	
	PFS 9.1.3, Program PFS-18, Program			Brief Description: Sets reduced per person diversiosn rate target					
SW-1		Solid Waste		<u>Detailed Assumptions:</u> Reduce existing disposal rate to 1.5 pounds/person/day. Because Folsom currently is on track to meet State diversion targets, it is assumed that continuation of existing programs will result in further reductions in waste disposal by 2035.	4,674	7,787	10,930	13,942	
SW-2	PFS 9.1.3, Program PFS-18, Program PFS-19, Program PFS-20, Program PFS-21	Solid Waste	Divert organic waste from landfills	Brief Description: Implement composting program to divert food and green waste from landfills.  Detailed Assumptions: Implementation of PFS -18, PFS-19, PFS-20, and PFS-21 would result in composting programs and waste-reduction efforts. The measure assumes that Folsom will reach 75 percent diversion of green and 50 percent of food waste for residential and commercial land uses by 2035.	1,606	4,005	4,471	5,541	
				TOTAL ANNUAL SAVINGS (MTCO2e)	6,279	11,793	15,400	19,482	
community					6,279	11,793	15,400	19,482	
municinal					25	42	59	76	

P Measure	GP	Category	Measure Title	Description	Annual GHG Reduction (MT CO₂e)			
ii ivicasure	Policy/Program	category	Wiedsuie Title	Description	2020	2030	2035	2050
E-1	NCR 3.2.3, LU 9.1.10, LU 1.1.17, Revised Policy and Programs PFS-25, Program LU-6	Energy	Improve Building Energy Efficiency in New Development	Brief Description: Applies GHG reductions associated with building energy efficiency and renewable energy generation in new development through CALGreen Tier 1 and ZNE.  Detailed Assumptions: Assumes that 35 percent of new development (17.5 percent residential/commercial split) would be consistent with CAP measures and thus incorporate Tier 1 into project designs or conditions of approval in new construction. Of the 35 percent of new development that would be Tier 1 compliant, 10 percent would also achieve ZNE	262	1,501	2,171	4,048
E-2	PFS 8.1.9, Program PFS-23	Energy	Water Heater Replacement in Existing Residential Development	Brief Description: Applies GHG reductions associated with voluntary replacement of existing water heaters with high-efficiency and alternatively-powered water heaters.  Detailed Assumptions: Assumes that up to 25 percent of existing development would install more efficient or alternatively-powered water heaters by 2035, for the purpose of reducing or eliminating natural gas usage in water heating. High-efficiency and alternatively powered water heaters could include solar water heating, electric heat pump, or tankless electric or tankless natural gas.	0	1,326	1,856	1,856
E-3	PFS 8.1.5, PFS 8.1.4, Program PFS-24	Energy	Improve Building Energy Efficiency in Existing Development	Brief Description: Assumes continued participation in existing energy efficiency upgrade programs and an increased participation rate into the future.  Detailed Assumptions: Assumes that participation in existing SMUD energy efficiency upgrade programs will increase to 10 percent for all residential uses by 2035 and 15 percent of all commercial/industrial buildings by 2035. Participation would increase due to continuation of SMUD programs and coordination efforts with the City to promote such programs. The City may consider providing additional incentives and educational material through new programs identified by new Implementation Policy associated with PFS 8.1.3, PFS 8.1.5, and PFS 8.1.4	48	574	623	623
E-4	PFS 8.1.3, Program PFS-24	Energy	Increase Use of Renewable Energy in Existing Development	Brief Description: Assumes continued participation in existing renewable energy retrofit programs and an increased participation rate into the future.  Detailed Assumptions: This measure assumes that 10 percent of all existing residential buildings and 15 percent of all existing commercial buildings in the City would either participate in SMUD's Greenergy of Solar Shares programs, or install on-site solar PV to offset electricity use. The City may consider providing additional incentives and educational material through new programs identified by new Implementation Policy associated with PFS 8.1.3, PFS 8.1.5, and PFS 8.1.4.	1,844	3,328	3,325	3,324
E-5	PFS 8.1.7	Energy	Improve Energy Efficiency in City-Owned Facilities	Brief Description/Detailed Assumptions: Reduces energy use at City facilities by 20 percent below 2014 levels by 2035.	388	876	1,180	1,847
E-6	PFS 8.1.3, Program PFS-22	Energy	Increase use of Renewable Energy in City- Operated Facilities	<u>Brief Description/Detailed Assumptions:</u> Sets city goal to suppplement 25 percent of the City's operational electricity with renewable energy sources by 2035. Renewable energy includes on-site generation or off-site purchase agreements.	79	264	310	310
				TOTAL ANNUAL SAVINGS (MTCO2e)	2,622	7,868	9,466	12,008
					2,622	7.868	9,466	12,008
Community								

Existing Building Improvements Total 3,949 3,949 3,947

Water and Waster	Water and Wastewater Measures									
Managura Numbar	GOP	Catagoni	Manager Title	Maggura Nama	Annual GHG Reduction (MT CO₂e)					
Measure Number	Policy/Program	Category Measure Title Measure Name		ivieasure ivame	2020	2030	2035	2050		
W-1	PFS 3.1.3, PFS 3.1.9, Program PFS-27	Water and Wastewater	Increase Water Efficiency in New Residential Development	Brief Description: Increases water efficiency  Detailed Assumptions: Require installation of water-efficient appliances and plumbing fixtures in 17.5 percent of new residential construction (based on an assumed capture rate of 35 percent of all new development that would be consistent with CAP measures and a 50/50 split between residential and commercial development) pursuant to Tier 1 of the California Green Building Standards Code (CALGreen) by 2035	0	1	1	3		
W-2	PFS 3.1.3, PFS 3.1.9, Program PFS-27	Water and Wastewater	Reduce Outdoor Water Use	Brief Summary: Reduces outdoor water use  Detailed Assumptions: Require a 40 percent reduction below BAU levels in outdoor water use for landscaping in new and existing residential and nonresidential development by 2035	0	293	309	394		
W-3	PFS 3.1.3, PFS 3.1.9, PFS-27	Water and Wastewater	Reduce Potable Water Consumption at City Facilities	<u>Petailed Assumptions:</u> Reduce potable water consumption at City facilities. <u>Detailed Assumptions:</u> Reduce potable water consumption at City facilities by 30 percent below 2014 levels by 2035	416	357	360	487		
				Community Total	416	652	671	884		
				Municipal Total	416	357	360	487		

**Energy Reduction Measure Quantification** 

Assumptions					
		2020	2030	2035	2050
SMUD Emissions Factor (MTCO2e/MWh) Natural Gas Emissions Factor (MTCO2e/therm)		0.240	0.179 0.00685	0.179	0.179
E-1 Improve Building Energy Efficiency in New Development	2044	2020	2020	2025	2050
This calculates the GHG reductions associated with adoption of CalGreen Tier 1 energy improconstruction of residential and non-residential projects. The capture rate was assumed to be coordination with the City.					
City of Folsom Population City of Folsom Job Force	73,334 34,800	80,833 38,368	95,074 45,145	103,110 48,970	131,526 62,502
Residential					
Forecast energy usage (w/o 2016 code, scaled by population)					
Electricity (MWh)	244,521	269,526	317,011	343,804	438,553
Natural Gas (therms)	9,582,028	10,561,895	12,422,696	13,472,644	17,185,567
New Energy Use Only (w/o 2016 code, difference between future and existing)					
Electricity (MWh)		25,005	72,490	99,283	194,032
Natural Gas (therms)		979,867	2,840,668	3,890,616	7,603,539
New Energy Use Only (w/ 2016 code)					
Electricity (MWh) Natural Gas (therms)		13,503 529,128	39,145 1,533,961	53,613 2,100,933	104,777 4,105,911
Nuturui Gus (tiierinis)		329,128	1,333,901	2,100,955	4,105,911
New Energy Use Only (w/ 2016 code and Tier 1)		12.022	27.204	50.055	00.503
Electricity (MWh) Natural Gas (therms)		12,833 502,892	37,204 1,457,902	50,955 1,996,762	99,582 3,902,326
Percent of new building energy applied to measure Tier 1 reduction above 2016 Title 24		17.5% 15%	17.5% 15%	17.5% 15%	17.5% 15%
Percent of new building energy Tier 1 compliant also meeting ZNE		10%	10%	10%	10%
New Energy measure applied to Electricity (MWh)		2,363	6,850	9,382	18,336
Natural Gas (therms)		92,597	268,443	367,663	718,534
Reduction in energy from Tier 1  Electricity (MWh)		670	1,941	2,658	5,195
Natural Gas (therms)		26,236	76,059	104,171	203,585
Adjusted Energy Heafrem buildings built through years	2014 2019	2018-2019	2020 2020	2030-2034	2035-2050
Adjusted Energy Use from buildings built through years:  Electricity (MWh)	2014-2018 11,252	2,139	2020-2029 24,371	13,751	48,628
Natural Gas (therms)	440,940	83,815	955,009	538,860	1,905,565
Cumulative Energy use from New Buildings					
Electricity (MWh)		13,391	37,762	51,513	100,140
Natural Gas (therms)		524,755	1,479,765	2,018,625	3,924,189
Energy Reductions from Baseline for Tier 1					
Electricity (MWh)		112	1,383	2,100	4,637
Natural Gas (therms)		4,373	54,196	82,308	181,721
Energy Reductions from Baseline for ZNE					
Electricity (MWh)		236	685	938	1,834
Natural Gas (therms)		9,260	26,844	36,766	71,853
Emissions Reductions (MTCO2e)		02	270	544	4.50
Electricity Natural Gas		83 93	370 555	544 816	1,158 1,245

### **Energy Reduction Measure Quantification (Continued)**

E-1 Improve Building Energy Efficiency in New Development (Continued)	2014	2020	2030	2035	2050
Commercial					
Forecast energy usage (w/o 2016 code, scaled by jobs)					
Electricity (MWh)	411,904	454,132	534,350	579,625	739,796
Natural Gas (therms)	360,957	397,962	468,257	507,933	648,293
New Energy Use Only (w/o 2016 code, difference between future and existing)					
Electricity (MWh)		42,228	122,445	167,721	327,892
Natural Gas (therms)		37,005	107,300	146,976	287,336
New Energy Use Only (w/ 2016 code)					
Electricity (MWh)		28,082	81,426	111,534	218,048
Natural Gas (therms)		24,608	71,355	97,739	191,078
New Energy Use Only (w/ 2016 code and Tier 1)					
Electricity (MWh)		27,684	79,408	108,769	212,642
Natural Gas (therms)		24,260	69,586	95,316	186,341
Percent of new building energy applied to measure		10.0%	17.5%	17.5%	17.5%
Tier 1 reduction above 2016 Title 24		15%	15%	15%	15%
Percent of new building energy Tier 1 compliant also meeting ZNE		10%	10%	10%	10%
New Energy measure applied to					
Electricity (MWh)		2,808	14,250	19,519	38,158
Natural Gas (therms)		2,461	12,487	17,104	33,439
Reduction in energy from Tier 1					
Electricity (MWh)		398	2,019	2,765	5,406
Natural Gas (therms)		349	1,769	2,423	4,737
Adjusted Energy Use from buildings built through years:	2014-2018	2019	2020-2029	2030-2034	2035-2050
Electricity (MWh)	23,401	4,614	51,724	29,362	103,873
Natural Gas (therms)	20,507	4,043	45,326	25,730	91,025
		2020	2030	2035	2050
Cumulative Energy use from New Buildings					
Electricity (MWh)		28,015	79,739	109,101	212,974
Natural Gas (therms)		24,550	69,876	95,606	186,632
Energy Reductions from Baseline Tier 1 Compliant					
Electricity (MWh)		66	1,687	2,434	5,074
Natural Gas (therms)		58	1,478	2,133	4,447
Energy Reductions from Baseline for ZNE					
Electricity (MWh)		281	1,425	1,952	3,816
Natural Gas (therms)		246	1,249	1,710	3,344
Emissions Reductions (MTCO2e)					
Electricity		83	557	785	1,591
Natural Gas		2	19	26	53
Commercial and Residential					
Emissions Reductions (MTCO2e)					
Electricity		167	927	1,329	2,750
Natural Gas		95	574	842	1,298

Note: ZNE aims for a net zero usage in energy, which does not necessarily translate to net zero emissions because natural gas and electricity have different emission factors. If roof-top solar is being used to offset overall energy usage, the reductions in emissions would be greater because there are more emissions reductions per unit of energy for electricity than for natural gas, based on estimated SMUD emission factors.

GHG Reductions from E-1 Improve Building Energy Efficiency in New				
Development (MTCO2e)	262	1,501	2,171	4,048

-3 Improve Building Energy Efficiency in Existing Development					
	2014	2020	2030	2035	205
his calculation is based on SMUD-provided participation rates data for the City of Folsom in S. y 2035 due to policies related to continuation of Folsom participating and collaborating with .					
higher. Average participation rates reflect average participation rates across all programs.	SINIOD. THIS MEUSURE does I	iot include natural gas savings	s as those savings were not av	unuble from PGE, thus emissio	nis reductions may
ackground Data					
umber of Housing Units	26,192				
umber of commercial customers	485	485	485	485	48
IUD 2015 Energy Efficiency Program Summary					
Residential					
Number of Participants	1119				
Average Savings per Participant (Assumes residences applied no more than					
one measure) (kWh)	958				
Commercial					
Number of Participants	57				
Average Savings per Participant (Assumes businesses applied for no more					
than one measure) (kWh)	36,779				
ticipation Rates and Energy Reductions					
ticipation rate and energy savings of existing buildings participating in SMUD rebates					
grams based on 2015 data from SMUD.					
esidential					
Number of Participating Households	1,119	1,200	2,500	2,500	2,50
Number of New Participating Households starting from 2014	4.270/	81	1,381	1,381	1,38
Participation rate (2014: average, 2020-2050: target average) Average Saving per Participant (kWh/hh)	4.27% 958	9% 1,000	10% 1,800	10% 2,000	2,00
Electricity reductions (kWh)	550	81,000	2,485,800	2,762,000	2,762,00
Electricity reductions (MWh)		81	2,486	2,762	2,76
Emissions Reductions (MTCO2e)		19	445	494	49
ommercial					
Number of Participating Businesses	57	60	73	73	7:
Number of New Participating Businesses starting from 2014		3	16	16	16
Participation rate (2014: average, 2020-2050: target average)	11.75%	12.4%	15.1%	15.1%	15.1
Average Saving per Participant (kWh/business)	36,779	40,000	45,000	45,000	45,00
Electricity reductions (kWh) Electricity reductions (MWh)		120,000 120	720,000 720	720,000 720	720,00 72
Emissions Reductions (MTCO2e)		29	129	129	12:
G Reductions from E-3 Improve Building Energy Efficiency in Existing relopment (MTCO2e)		48	574	623	623
Increase Use of Renewable Energy in Existing Development					
	2014	2020	2030	2035	205
is calculation is based on SMUD-provided participation rates data for the City of Folsom in S. 2035 due to policies related to continuation of Folsom participating and collaborating with .					
ckground Data					
mber of Housing Units	26,192				
ber of commercial customers	485	485	485	485	48
ticipation Rates and Emissions Savings					
icipation rate of existing buildings participating in SMUD rebates/solar/greenergy					
grams based on 2015 data from SMUD. Assumes that participating HH and businesses an average amount of energy.					
an average amount of energy.					
esidential					
articipation Rates of Existing Residences (2014: current, 2020-2050: target)					
500/ office	1.20/	20/	20/	20/	20
reenergy-50% offset reenergy- 100% offset	1.2% 2.9%	2% 3%	3% 3%	3% 3%	3
/ retrofits/Solar Shares	0.7%	2%	5%	5%	5
otal participation of residential	3.770	6%	10%	10%	10
ergy usage from existing residential (MWh)		244,521	244,521	244,521	244,52
ectricity reductions from other measures (MWh)					
E-3 Improve Building Energy Efficiency in Existing Development		81	2,486	2,762	2,76
W-2 Reduce Outdoor Water Use W-3 Reduce Potable Water Consumption at City Facilities		41	1,181 73	1,281 164	1,633 164
		41	/5	104	164
14/_/					
W-4 Adjusted electricity demand from existing residential (MWh)		244,399	240,782	240,315	239,962

276

(92)

922

1,106

277

(92)

924

1,109

84 21

231

336

276

(92)

921

1,105

Emissions reductions relative to 2014 from... (MTCO2e)

Total Emissions Reductions from Residential (MTCO2e)

Greenergy-50% offset Greenergy- 100% offset

PV retrofits/Solar Shares

Commercial/Industrial					
Participation Rates of Existing Business including municipal (2014: current, 2020-					
2050: target) (Total participation rate cannot exceed 98% in order to exclude					
municipal)					
Greenergy-50% offset	1.0%	3%	5%	5%	5%
Greenergy- 100% offset	1.0%	5%	5%	5%	5%
PV retrofits	0.6%	3%	5%	5%	5%
Total participation of commercial and industrial		10%	15%	15%	15%
Energy usage from existing commercial/industrial (MWh)		411,904	411,904	411,904	411,904
Electricity reductions from PFS 8.1.4. (MWh)		120	720	720	720
Adjusted electricity demand from existing residential (MWh)		411,784	411,184	411,184	411,184
Emissions reductions relative to 2014 from (MTCO2e)					
Greenergy-50% offset		377	828	828	828
Greenergy- 100% offset		608	453	453	453
PV retrofits/Solar Shares		524	938	938	938
Total Emissions Reductions from Commercial/Industrial (MTCO2e)					
		1,509	2,219	2,219	2,219
GHG Reductions from E-4 Increase Use of Renewable Energy in Existing					
Development (MTCO2e)		1,844	3,328	3,325	3,324
E-5 Improve Energy Efficiency in City-Owned Facilities					
2 5 improve znergy zmalency in eley context asimiles	2014	2020	2030	2035	2050
Diesel use is not included in these calculations.					
Electricity Use at City Facilities (MWh)					
Facility Type					
traffic lights	395	435	512	555	708
street lights	2,842	3,133	3,685	3,996	5,098
buildings	4,377	4,674	5,239	5,558	6,686
Parks (irrigation/lights)	1,056	1,127	1,264	1,341	1,613
Total Electricity	8,669	9,370	10,700	11,451	14,105
Natural Gas Use at City Facilities (therms)					
Buildings & Other Facilities	108,927	116,334	130,401	138,339	166,407
Total Natural Gas	108,927	116,334	130,401	138,339	166,407
Percent reduction in energy use <b>below 2014 levels</b>		5%	15%	20%	20%
Target Annual Electricity Use (MWh)		8,236	7,369	6,936	6,936
Target Annual Natural Gas Use (Therms)		103,481	92,588	87,142	87,142
Annual Electricity Reductions (MWh)		1,134	3,331	4,515	7,169
Annual Natural Gas (therms)		12,854	37,813	51,197	79,265
Electricity savings associated with 75 KW solar on sports complex (mwh/yr)		116	116	116	116
Electricity savings associated with 75 KW solar on sports complex (mwh/yr)  Emissions savings from reduced electricity (MTCO2e)		116 300	116 617	116 829	116 1,304

388

876

1,180

1,847

GHG Reductions from E-5 Improve Energy Efficiency in City-Owned Facilities (MTCO2e)  $\label{eq:matching}$ 

E-6 Increase use of Renewable Energy in City-Operated Facilities				
	2020	2030	2035	2050
City electricity use after the implementation of E-5 Improve Energy Efficiency in	8,236	7,369	6,936	6,936
Percent of renewable electricity generated on-site or through Power Purchase Agreements	4%	20%	25%	25%
Electricity offset (MWh)	329	1,474	1,734	1,734
GHG Reductions from E-6 Increase use of Renewable Energy in City-Operated Facilities (MTCO2e)	79	264	310	310

E-2 Water Heater Replacement in Existing Residential Development				
	2020	2030	2035	2050

Note: Only homes not connected to natural gas utilities are allowed to install electric water heaters (See 2016 California Energy Code, Title 24 Part 6). Measure is conservative in that it assumes no water heaters are converted to solar, which would result in more GHG reductions.

Percent of natural gas use in homes by end use in California (assumed to

apply to propane -only homes also)

Water heating usage by fuel type

 Space Heating
 25%

 Water Heating
 34%

 Cooking
 25%

 Other
 16%

 2009

 Natural Gas
 85%

 Electric
 11%

Propane
Source: EIA 2009. http://www.eia.gov/consumption/residential/data/2009/

Note: This is based on most recent data from the US. Energy Information Administration as of May 2017. There was a survey done in 2015, but the breakdown of fuel use by end use will not be available until 2018.

https://www.eia.gov/consumption/residential/data/2015/index.php?view=consumption

Average age of natural gas water heater at replacement (years)

13

4%

	ercent of existing 6/Propane water						
hea	aters by age (EIA 2009)	Assumed percent of	Assumed percent of existing NG/Propane water heaters replaced by this				
	2009	2020	2030	2035	2050		
Less Than 2 Years	16%	0	100%	100%	100%		
2 to 4 Years	16%	0	100%	100%	100%		
5 to 9 Years	30%	50%	100%	100%	100%		
10 to 14 Years	18%	100%	100%	100%	100%		
15 to 19 Years	7%	100%	100%	100%	100%		
20 Years or More	14%	100%	100%	100%	100%		
	2014	2020	2030	2035	2050		
Annual Residential Natural Gas Use in Folsom with Legislative Reductions							
(therms)	9,582,028	10,176,465	11,322,789	11,978,735	14,344,071		
Total Therms	9,582,028	10,176,465	11,322,789	11,978,735	14,344,071		

### **Energy Reduction Measure Quantification (Continued)**

E-2 Water Heater Replacement in Existing Residential Development (Continued)					
		2020	2030	2035	2050
Percent of replacement water heaters that are electric (only applicable to households that do not have natural gas connections per 2016 Energy Code)		5%	5%	5%	5%
Percent of replacement water heaters that are natural gas tankless		95%	95%	95%	95%
Existing Water Heater Replacement Participation Rate		10%	25%	35%	35%
Natural Gas Savings from not using traditional Water Heaters in new construction  Natural gas usage in new water heaters (No Action) (therms)  Natural gas usage in participating new water heaters (therms)  Average annual natural gas usage per water heater (therms/heater)  (assuming 64 gal/year and a 0.61 energy factor)  (https://energy.gov/eere/femp/energy-cost-calculator-electric-and-gas-			3,225,323.15 -	3,225,323.15 -	3,225,323.15 -
water-heaters-O#output) Estimated equivalent number of water heaters replaced Natural Gas Savings from avoidance of traditional water heaters in new construction (therms) GHG Reductions from Natural Gas Savings (MTCO2e)	244		- 1	- 1	- 1
Natural Gas Savings from replacement of Existing Water Heaters  Natural gas usage in existing water heaters (No Action) (therms)			3,225,323	3,225,323	3,225,323
Natural gas usage in participating existing water heaters (therms) Average annual natural gas usage per water heater (therms/heater) (assuming 64 gal/year and a 0.61 energy factor) (https://energy.gov/eere/femp/energy-cost-calculator-electric-and-gas-water-heaters-0#output) Estimated equivalent number of water heaters replaced Natural Gas Savings from removal of traditional water heaters in existing homes (therms)	244		3,305 806,331	1,128,863 4,626 1,128,863	1,128,863 4,626 1,128,863
GHG Reductions from Natural Gas Savings (MTCO2e)  Propane Savings from replacement of Existing Water Heaters  Propane usage in existing water heaters (No Action) (therms)			5,523.37	7,732.71	7,732.71
Propane usage in <b>existing</b> water heaters after replacement (therms)			-	-	-
Propane Savings from replacement of Existing Water Heaters (therms) GHG Reductions from Propane Savings (MTCO2e)					
Additional emissions from electricity use in new water heaters in Existing Propane-only homes  Therms needed to heat 45 gallons of hot water (61% efficiency) kWh needed to heat 45 gallons of hot water (99% efficiency) kwh per therm conversion for water heating	0.333333 6.6 19.8000198				
Total electricity use needed to offset propane water heating (kWh) Additional GHG emissions from Electricity Use (MTCO2e)			-	-	-
Additional emissions from natural gas use in new NG tankless water heaters in Existing NG Homes and New Construction  Percent savings relative to storage tank natural gas water heaters (Average)  Total natural gas use needed for new NG tankless water heaters	20%	Source: https://energy.gov/e			
(therms) Additional GHG emissions from new NG Use (MTCO2e)			612,811 4,197.76	857,936 5,876.86	857,936 5,876.86
GHG Reductions from E-2 Water Heater Replacement in Existing Residential Development (MTCO2e)			1,326	1,856	1,856

Emissions Reductions Annual VMT Reduced

Emissions Reductions (MTCO2e)

Emissions per mile for Passenger and LDT1 vehicles (MTCO2e/mi)

Emissions Reductions as of 2020 (MTCO2e)
GHG Reductions from LU 3.1.1, LU 3.1.5, LU 3.1.6, LU 4.1.2, LU 4.1.3, NCR 3.1.3 (MTCO2e)

Assumptions								
					2020	2030	2035	2050
SMUD Emissions Factor (MTCO2e/MWh)					0.240	0.179	0.179	0.179
Natural Gas Emissions Factor (MTCO2e/therm)						0.00685		
T-1 Reduce VMT Through Mixed and High Density Land Use								
Background Calculations	ı	1						
GP LU Designation	2035 Acres	2035 DU	2035 Population Estimate					
MLD- 10 DU/acre	316	3155	7,257					
MMD- 16 DU/acre	34	537	1,235					
MHD- 24 DU/acre	112	2686	6,178					
MU- 25 DU/acre	34	850	1,956					
EBC- 25 du/acre	78	1947	4,477					
HF- 25 du/acre	5	130	298					
Population Affected by the Improved Design of Development			21,401					
Persons/MF unit	2.3							
Source: Mintier Harnish 2017				2011	2020	2020	2025	2050
City of Folsom Population			-	2014 73,334	2020 80,833	2030 95,074	2035 103,110	2050 131,526
Population affected by Improved Design of Development (applies t	o all now growth within	TOD/MIL areas)		73,334	6,114	16,305	21,401	21,401
Percent of Population or VMT affected	o an new growth within	i iod/ivio areas)			8%	17%	21,401	16%
Passenger and LDT1 VMT (excluding City employee commute)				692,439,473	713,499,810	772,690,209	810,625,227	964,453,281
VMT affected by Improved Design (New Development)				,,	53,971,081	132,515,717	168,245,867	156,925,845
Percent of all new development in TOD/MU areas					100%	100%	100%	100%
CAPCOA LUT-9: Improve Design of Development (note that CAPCO	DA mislabels LUT-9 as I	LUT-8)						
% VMT Reduction (Low)	3%							
% VMT Reduction (High)	21%							
Median Percentage	12.2%							
% VMT reduction	12.2%	ĺ						

6,557,486

0.0003108

2,038

2,038

16,100,660

0.0002312

3,722 1,684

3,722

20,441,873

0.0002139

4,373

2,335

4,373

19,066,490

0.0002029

3,869

1,831

3,869

				2014	2020	2030	2035	2050
Passenger and LDT1 VMT (excluding City employee commute)				692,439,473	713,499,810	772,690,209	810,625,227	964,453,28
New Passenger and LDT1 VMT since 2020 (for calculation of T-3 Add	opt Citywide TDM)					59,190,399	97,125,417	250,953,47
CAPCOA SDT-2 ( Percent reduction in VMT for rural contexts)								
% of	streets with improvements							
	30%	30%	25%	25%	50%	30%	75%	1009
% of intersections with improvements	% VMT Reduction							
30%	0.25%	0.25%	0.15%	0.34%	0.40%	0.40%	0.40%	0.659
30%	0.25%	0.25%	0.15%	0.34%	0.40%	0.40%	0.40%	0.659
25%	0.15%	0.15%	0.25%	0.06%	0.25%	0.05%	0.50%	0.509
25%	0.15%	0.15%	0.06%	0.43%	0.44%	0.53%	0.31%	0.699
50%	0.40%	0.40%	0.25%	0.44%	0.50%	0.50%	0.50%	0.759
30%	0.40%	0.40%	0.05%	0.53%	0.50%	0.66%	0.30%	0.759
75%	0.40%	0.40%	0.50%	0.31%	0.50%	0.30%	0.75%	0.759
100%	0.65%	0.65%	0.50%	0.69%	0.75%	0.75%	0.75%	19
Note: Bolded percentage values were interpolated based on CAPCOA	A estimates for 25%, 50%, 75	%, and 100%.						
Folsom Street/Intersection Targets					2020	2030	2035	205
Percent of intersections in the City with improvements					0%	30%	30%	309
Percent of streets in the City with improvements					0%	25%	30%	309
								0.050
Percent Reduction in VMT under T-2 Improve Streets and Intersection	ons for Multi-Modal Use and	Access			0.00%	0.15%	0.25%	0.759
•					0.00%	0.15% 1.157.935	0.25% 2.012.602	
Percent Reduction in VMT under T-2 Improve Streets and Intersections Annual VMT Reduced under T-2 Improve Streets and Intersections f	or Multi-Modal Use and Acce	ess	s of 2020		0.00% - -	1,157,935	2,012,602	0.259 2,394,523 623.062
·	or Multi-Modal Use and Acce	ess	s of 2020		0.00% - - - 3.11E-04		0.2071	

T-3 Adopt Citywide TDM					
		2020	2030	2035	2050
Passenger and LDT1 VMT (excluding non-unincorporated City employee commute)  New Passenger and LDT1 VMT since 2020  New Passenger VMT (since 2020) reduced from other measures	694,653,925	715,940,714 0	775,294,804 59,354,090	813,738,819 97,798,105	822,166,218 106,225,504
T-1 Reduce VMT Through Mixed and High Density Land Use T-2 Improve Streets and Intersections for Multi-Modal Use and Access		0	1,684 88,701	2,335 241,141	1,831 623,062
Adjusted New Passenger and LDT1 VMT (assumed to represent all new household VMT)		0	59,263,705	97,554,629	105,600,611
Percent of Household VMT for commuting (AASHTO 2013) City Commute VMT reduced from Adjusted Passenger and LDT1 VMT	28%	-	16,593,837	27,315,296	29,568,171
Reductions in Commute VMT from other measures not included as the percent reduction is from the forecasted commute VMT					
Target					
Target Percent Reduction in New Commute VMT starting in 2020 Annual VMT reduced under T-3 Adopt Citywide TDM		0%	15.0% 2,489,076	15% 4,097,294	4,435,226
CAPCOA Percent Commute VMT reduction from TRT-1, TRT-2, and TRT-3					
CAPCOA TRT-1 Percent Shift in Vehicle Mode Share of Commute Trips for Participating Employees (Commute Trip Reduction Programs - Voluntary) - Low Density Suburb	5.2%				
CAPCOA TRT-2 Percent Shift in Vehicle Mode Share of Commute Trips for Participating Employees (Commute Trip Reduction Programs with Monitoring)	21.0%				
CAPCOA TRT-3 Percent Shift in Vehicle Mode Share of Commute Trips with a Ride Sharing Program - Low Density Suburb	5%				
	<u></u>	2020	2030	2035	2050
Percent of New Employees eligible/participating in TDM programs (Required to meet the Target Percent Reduction in					
Commute VMT)			100%	100%	100%
Commute Trip Reduction Programs - Voluntary (TRT-1) Commute Trip Reduction Programs - Monitored (TRT-2)		0% 0%	33%	33% 62%	33% 62%
Commute Trip Reduction Programs - Monitored (TRT-2)  Commute Trip Reduction Programs - Ride Sharing (TRT-3)		0%	62% 5%	5% 5%	5% 5%
Total Participation Rate		0%	100%	100%	100%
Emissions per mile for Passenger and LDT1 vehicles (MTCO2e/mi)	0.00E+00	3.11E-04	2.31E-04	2.14E-04	2.03E-04
GHG Reductions from T-3 Adopt Citywide TDM (MTCO2e)			575	877	900

T-4 Adopt TDM For City Employees					
	2014	2020	2030	2035	2050
City employee commute VMT from Inventory	2,214,452	2,440,904	2,604,596	3,113,592	3,971,666
Emissions per mile for Employee commute (MTCO2e/mi) Forecasted emissions from Employee Commuting (MTCO2e)	3.64E-04 806	3.11E-04 759	2.31E-04 602	2.14E-04 666	2.03E-04 806
Percent reduction in employee commute miles <b>below 2014 levels</b> Annual employee commute miles after reduction (VMT) Annual reduction in employee commute miles from forecasts (VMT)		0% 2,440,904 -	15% 1,882,284 722,311	15% 1,882,284 1,231,308	1,882,284 2,089,382
Forecasted commute emissions after reduction (MTCO2e)		759	435	403	382
GHG Reductions from T-4 Adopt TDM For City Employees (MTCO2e)		-	167	263	424
T-5 Reduce Minimum Parking Standards					
1 5 readice minimum 1 draing Standards	2014	2020	2030	2035	2050
Passenger and LDT1 VMT (excluding City employee commute) New Passenger VMT (since 2020) New Passenger VMT (since 2020) reduced from other measures  T-1 Reduce VMT Through Mixed and High Density Land Use T-2 Improve Streets and Intersections for Multi-Modal Use and Access T-3 Adopt Citywide TDM	692,439,473	713,499,810 0 0 0	772,690,209 59,190,399 1,684 88,701 2,489,076	810,625,227 97,125,417 2,335 241,141 4,097,294	964,453,281 250,953,471 1,831 623,062 4,435,226
Adjusted New VMT  Percent of Household VMT for commuting (AASHTO 2013)  New Commute VMT  Reductions in Commute VMT from other measures not included as the percent reduction is from the forecasted commute VMT		-	56,610,937 15,851,062	92,784,646 25,979,701	245,893,352 68,850,139
Target Percent VMT reduction from New Commute VMT		2%	2%	2%	5%
Calculated Percent Reduction in Parking Spaces at new land uses to achieve the target percent reduction (CAPCOA PDT-1)		4%	5%	5%	10%
VMT reduction under this measure Emissions per mile for Passenger and LDT1 vehicles (MTCO2e/mi)		- 0.000310796	356,649 0.000231189	584,543 0.000213948	3,442,507 0.000202931
GHG Reductions from T-5 Reduce Minimum Parking Standards (MTCO2e)			82	125	699

Municipal Offroad Emissions (MTCO2e) Reductions from municipal off-road feet (MTCO2e)

T-6 Require the Use of High-Performance Renewable Diesel in	n Construction Equipment								
		2014	2020	2030	2035	2050			
Measure assumes the level of conversion from diesel to alternative fuels is proportional to level of emissions reductions from such actions. Measure also assumes that any emissions related to additional electricity use from converted equipment are negligible.  Emissions from electricity use would decrease in future years due to the increasing renewable energy mix in the electricity generation. This measure only applies to all construction activity/off road equipment.									
Construction Equipment Emissions (MTCO2e)			17,391	20,462	22,196	28,330			
Percent construction fuel offset due to conversion of equipment	nt to renewable diesel or electric fuel sources		0%	50%	100%	100%			
Assumed percent converted to renewable diesel			50%	50%	100%	100%			
Assumed percent converted to electric			0%	0%	0%	0%			
Non-Renewable Diesel fuel emission factors (kg CO2/gal)	(The Climate Registry 2016)	10.21							
Ratio of non-CO2 GHGs to CO2	(GREET 2016 for low sulfur diesel)	1.04							
Non-Renewable Diesel fuel emission factors (kg CO2e/gal)		10.61							
Renewable diesel fuel emission factors (kg CO2e/gal)		0.40							
Emissions reductions from switching one gallon of non-renewa	ble								
diesel fuel with renewable diesel fuel (kgCO2e/gal)		10.21							
Non-Renewable diesel fuel use offset by renewable diesel conv	versions (gal)		-	501,037	2,173,960	2,774,702			
GHG Reductions from NCR 3.2.7, Program PFS-26 (MTCO2e)			-	5,116	22,196	28,330			
GHG reduction attributed to municipal fleet									

### **Built Environment and Transportation Reduction Measure Quantification (Continued)**

T-7 Alternative Fuel in City Fleet					
- 7 Internative real in any real	2014	2020	2030	2035	2050
Forecasted Emissions by Fuel from City Fleet Operations (MTCO2e)	2014	2020	2030	2035	2050
CNG	-	-	-	-	-
Diesel	2,019	2,218	2,600	2,817	3,587
Gasoline	1,422	1,571	1,850	2,007	2,562
Total	3,441	3,790	4,450	4,825	6,149
Fuel Type Gallons Used	Scaling Factors for busine	ess-as-usual forecaste	d emissions		
Diesel	195,906	215,939	253,984	275,450	351,361
Gasoline	168,006	185,186	217,812	236,221	301,321
Percent of Gasoline associated with emergency (fire/police) vehicles based on 2014 use of 65,016 gallons	39%				
		2020	2030	2035	2050
Percent of diesel onroad fleet converted to CNG		0%	50%	100%	100%
percent of gasoline onroad fleet converted to EV		0%	50%	61%	61%
percent of diesel fleet using HPRD			75%	100%	100%
Fuel/Energy Use					
Diesel Gallons converted to CNG		-	126,992	275,450	351,361
Efficiency: Diesel LHD vocational vehicle (MJ/mi) (GREET 2017) 15					
Efficiency: CNG LHD vocational vehicle (MJ/mi) (GREET 2017) 18					
CNG scf based on diesel gallon equivalent (126.67 scf/gal)					
(adjusted for difference in efficiency)		-	19,303,264	41,869,497	53,408,300
Gasoline gallons converted to electric		-	108,906	144,095	183,806
			,	,	,
Onroad annual miles associated with gasoline use converted to EV		-	4,826,329	6,820,305	9,046,695
KWH associated with gasoline miles per year		-	1,435	2,028	2,690
Emission Factors					
CNG emission factor (mtco2e/scf) 0.000054	44				
Diesel emission factor (mtco2e/gal)	0.01031	0.01027	0.01027	0.01024	0.01023
Gasoline emission factor (mtco2e/gal)	0.0085	0.0085	0.0085	0.0085	0.0085
GHG Emissions from Fuel Conversion					
Emissions from CNG use (mtco2e)	-	-	1,050.87	2,279.38	2,907.55
EV GHG Emissions		-	0.257	0.363	0.482
Emissions from Diesel Gallons still in fleet	2,019	2,218	1,305	-	-
Emissions from gasoline gallons still in fleet	1,422	1,571	925	783	999
Emissions from CNG in Fleet	-		1,051	2,279	2,908
Total Emissions with CNG/EV in Fleet	3,441	3,790	3,281	3,062	3,907
Diesel Emissions with RD			650	-	-
Total Emissions with RD and EV			1,576	783	999
GHG Reductions from T-7 Alternative Fuel in City Fleet (MTCO2e)	-		1,169	1,763	2,242
GHG Reduction with RD instead of CNG (measure was revised to include RD instead of CNG)			2,874	4,042	5,150

T-8 Install Electric Vehicle Charging Stations				
	2020	2030	2035	2050
The reductions calculated for this measure are assumed to achieve reductions above and beyond those forecasted by the State.				
EMFAC2014 Outputs for Sacramento City				
Total Vehicle Miles per day	37,440,165	41,850,063	44117927	50,735,777
VMT/year	13,665,660,062	15,275,272,915	16,103,043,326	18,518,558,673
Number of Evs in Sacramento County	10,614	73,269	101254	141,705
Scaled for Folsom Population				
Folsom Population	80,833	95,074	103,110	131,526
Sacramento County Population	1,578,029	1,762,759	1,854,128	2,105,299
Folsom to Sacramento County Population	5%	5%	6%	6%
Folsom EV Population	544	3,952	5,631	8,853
10% of EVs	54	395	563	885
10% of EVs (rounded)	50	400	560	890
Full day from FUC and the second seco				
Emissions from EV Charger Usage  Number of Chargers installed by 2035 (no additional targets set for 2050)		400	560	560
Number of Connections per Charge  Number of Connections per Charge	- 0	2	2	2
		3	3	3
Average Charging hours per Connection per day	0		-	
Number of hours of charge per year for all chargers (h/year)	- 24	817,600	1,144,640	1,144,640
Average Efficiency of EV LDV (kWh/100-mi) (1)	34	34	34	34
GHG Emissions per MWh in Folsom (MTCO2e/MWh)	0.240	0.179	0.179	0.179
Charger Power (kW) (Level 2 - High) (2)	6.6	6.6	6.6	6.6
Charged amount (kWh) EV emissions (MT CO2e)		5,396,160 966	7,554,624 1,352	7,554,624 1,352
ev elinisionis (ivi 1 CO2e) Source:	-	900	1,352	1,332
(1) http://www.fueleconomy.gov/feg/download.shtml (Without EV efficiency forecasts, EV efficiency assumed to be the same for all future years)				
(2) https://www.driveclean.ca.gov/pev/Charging.php				
Emissions from Equivalent Gasoline Usage				
Equivalent Annual VMT (mi)	-	16,046,626	22,465,276	22,465,276
Average Efficiency of Gasoline LDV (mpg)	34	44	47	49
Gallons of gasoline displaced (gal)		362,092	474,632	456,438
GHG Emissions per mi for average gasoline LDV (gCO2/mi) (EMFAC2014)	325	325	325	325
Equivalent Gasoline emissions (MT CO2e)	-	5,209	7,301	7,301
			•	
Emissions Reductions				
Emissions reductions (MT CO2e)	-	4,243	5,949	5,949
Emissions reductions per hour of charge (kg CO2e/h)		5.2	5.2	5.2
CLC Padustions from T. Q. Install Floatric Makiela Charging Stations (ASTCO2a)		4 3 4 3	F 040	F 040
GHG Reductions from T-8 Install Electric Vehicle Charging Stations (MTCO2e)	-	4,243	5,949	5,949

### **Solid Waste Reduction Measure Quantification**

### SW-1 Increase Solid Waste Diversion

See additional quantification on inventory/forecast sheets.

	2020	2030	2035	2050
community emissions	14,410	16,949	18,382	23,447
community emissions with measure	9,737	9,162	7,452	9,506
municipal emissions	78	92	100	128
municipal emissions with measure	53	50	41	52

based on meeting 1.5 pound/person (exceeds state goal of 2.7)

	2020	2030	2035	2050
GHG Reductions from SW-1 Increase Solid Waste Diversion (MTCO2e)	4,674	7,787	10,930	13,942
Municipal reduction	25	42	59	76

### SW-2 Divert organic waste from landfills

	2020	2030	2035	2050
Generation of Organic Waste In Folsom Based on 2014 Inventory Data				
Disposal	54,986	64,674	70,140	89,470
Commercial/Municipal				
Percentage of Disposal that is Commercial/Municipal *	74%	74%	74%	74%
Commercial Disposal	40,930	48,141	52,209	66,598
Percentage of Commercial/Municipal Disposal that is Organic ++	50%	50%	50%	50%
Commercial/Municipal Organic Disposal	20,465	24,070	26,105	33,299
<u>Residential</u>				
Percentage of Disposal that is Residential*	26%	26%	26%	26%
Residential Disposal	14,057	16,533	17,930	22,872
Percentage of Residential Disposal that is Organic* †	51.6%	51.6%	51.6%	51.6%
Residential Organic Disposal	7,253	8,531	9,252	11,802

<sup>\*</sup> Based on Commercial Streams Export from CalRecycle Waste Characterization Web

<sup>\*</sup>Based on Residential Streams Export from CalRecycle Waste Characterization Web Tool

<sup>†</sup> This is a conservative assumption because the success of the 75% diversion target would most likely reduce the number of landfilled recyclables and increase the percentage of overall organics per ton of disposal. However, the BAU forecast is also conservative because it assumes the percent organics does not change.

SW-2 Continued				
Commercial/Municipal Compost	2020	2030	2035	2050
Tons to Be Landfilled, Which Will Be Composted Instead				
AB 1826's Commercial Organic Waste Disposal Limit	10,232.42	12,035.18	10,232.42	10,232.42
Tons Composted Instead of Landfilled	10,232	12,035	15,872	23,067
City of Folsom Organic Breakdown				
Re	esidential Co	ommercial		
Food	55%	49%		
Green	11%	22%		
Lumber	1%	1%		
Paper	45%	91%		
Manure	0.01%	0.1%		
Percent of organics composted under SW-2				
Food	25%	50%	50%	50%
Green	35%	75%	75%	75%
Composted Commercial/Municipal Tons				
Food	2,506.94	5,897.24	6,395.66	8,158.24
Green	1,125.57	3,971.61	4,307.28	5,494.33
Percent of organics composted under SW-2				
Food	25%	50%	50%	50%
Green	35%	75%	75%	750
		7370	73/0	75%
Composted Residential Tons				
Food	997.32	2,346.05	2,544.33	3,245.52
	997.32 279.25			3,245.52
Food		2,346.05	2,544.33	3,245.52
Food Green		2,346.05	2,544.33	3,245.52 973.66
Food Green OTAL ORGANICS COMPOSTED INSTEAD OF LANDFILLED under SW-2	279.25	2,346.05 703.81	2,544.33 1,526.60	3,245.52 973.66 11,404
OTAL ORGANICS COMPOSTED INSTEAD OF LANDFILLED under SW-2  Food Green  Total	279.25 3,504.26	2,346.05 703.81 8,243	2,544.33 1,526.60 8,940	3,245.52 973.66 11,404 6,468
OTAL ORGANICS COMPOSTED INSTEAD OF LANDFILLED under SW-2  Food Green  Total missions Calculations	279.25 3,504.26 1,404.81 4,909	2,346.05 703.81 8,243 4,675 12,919	2,544.33 1,526.60 8,940 5,834 14,774	3,245.52 973.66 11,404 6,468 17,872
Food Green  OTAL ORGANICS COMPOSTED INSTEAD OF LANDFILLED under SW-2  Food Green  Total  missions Calculations  missions reductions per ton of food waste composted instead of landfilled (I	279.25 3,504.26 1,404.81 4,909 0.015658183	2,346.05 703.81 8,243 4,675 12,919	2,544.33 1,526.60 8,940 5,834 14,774	3,245.52 973.66 11,404 6,468 17,872
OTAL ORGANICS COMPOSTED INSTEAD OF LANDFILLED under SW-2  Food Green  Total  missions Calculations  missions reductions per ton of food waste composted instead of landfilled (I	279.25 3,504.26 1,404.81 4,909	2,346.05 703.81 8,243 4,675 12,919	2,544.33 1,526.60 8,940 5,834 14,774	3,245.52 973.66 11,404 6,468 17,872
OTAL ORGANICS COMPOSTED INSTEAD OF LANDFILLED under SW-2  Food Green  Total missions Calculations missions reductions per ton of food waste composted instead of landfilled (I missions reductions per ton of green waste composted instead of landfilled	3,504.26 1,404.81 4,909 0.015658183 0.006658732	2,346.05 703.81 8,243 4,675 12,919	2,544.33 1,526.60 8,940 5,834 14,774	3,245.52 973.66 11,404 6,468 17,872 0.01565818 0.00665873
Food Green  OTAL ORGANICS COMPOSTED INSTEAD OF LANDFILLED under SW-2  Food Green  Total missions Calculations missions reductions per ton of food waste composted instead of landfilled (I missions reductions per ton of green waste composted instead of landfilled missions reductions from food waste composted instead of landfilled	279.25 3,504.26 1,404.81 4,909 0.015658183	2,346.05 703.81 8,243 4,675 12,919 0.015658183 0.006658732	2,544.33 1,526.60 8,940 5,834 14,774 0.015658183 0.006658732	3,245.52 973.66 11,404 6,468 17,872 0.01565818 0.00665873
Food Green  OTAL ORGANICS COMPOSTED INSTEAD OF LANDFILLED under SW-2  Food Green  Total missions Calculations missions reductions per ton of food waste composted instead of landfilled (I missions reductions per ton of green waste composted instead of landfilled missions reductions from food waste composted instead of landfilled	3,504.26 1,404.81 4,909 0.015658183 0.006658732	2,346.05 703.81 8,243 4,675 12,919 0.015658183 0.006658732	2,544.33 1,526.60 8,940 5,834 14,774 0.015658183 0.006658732	3,245.52 973.66 11,404 6,468 17,872 0.01565818 0.00665873
Food Green  OTAL ORGANICS COMPOSTED INSTEAD OF LANDFILLED under SW-2  Food Green  Total  missions Calculations  missions reductions per ton of food waste composted instead of landfilled (I missions reductions per ton of green waste composted instead of landfilled  missions reductions from food waste composted instead of landfilled (MTCH missions reductions from green waste composted instead of landfilled (MTCH missions reductions from green waste composted instead of landfilled (MTCH missions reductions from food waste composted instead of landfilled (MTCH missions reductions from food waste composted instead of landfilled (MTCH missions reductions from food waste composted instead of landfilled (MTCH missions reductions from food waste composted instead of landfilled (MTCC)	3,504.26 1,404.81 4,909 0.015658183 0.006658732	2,346.05 703.81 8,243 4,675 12,919 0.015658183 0.006658732	2,544.33 1,526.60 8,940 5,834 14,774 0.015658183 0.006658732	3,245.52 973.66 11,404 6,468 17,872 0.01565818: 0.00665873:
Food Green  OTAL ORGANICS COMPOSTED INSTEAD OF LANDFILLED under SW-2  Food Green  Total missions Calculations missions reductions per ton of food waste composted instead of landfilled (I missions reductions per ton of green waste composted instead of landfilled missions reductions from food waste composted instead of landfilled (MTCH missions reductions from green waste composted instead of landfilled (MTCH missions reductions from green waste composted instead of landfilled (MTCH missions reductions from food waste composted instead of landfilled (MTCH missions reductions from food waste composted instead of landfilled (MTCH missions reductions from food waste composted instead of landfilled (MTCH missions reductions from food waste composted instead of landfilled (MTCC)	3,504.26 1,404.81 4,909 0.015658183 0.006658732	2,346.05 703.81 8,243 4,675 12,919 0.015658183 0.006658732 129 31	2,544.33 1,526.60 8,940 5,834 14,774 0.015658183 0.006658732 140 39	3,245.52 973.66 11,404 6,468 17,872 0.01565818: 0.00665873: 179 43
Food Green  OTAL ORGANICS COMPOSTED INSTEAD OF LANDFILLED under SW-2  Food Green  Total  missions Calculations  missions reductions per ton of food waste composted instead of landfilled (I missions reductions per ton of green waste composted instead of landfilled  missions reductions from food waste composted instead of landfilled (MTCH missions reductions from green waste composted instead of landfilled (MTCH missions reductions from food waste composted instead of landfilled (MTCC missions reductions from green waste composted instead of landfilled (MTCC missions reductions from green waste composted instead of landfilled (MTCC missions reductions from green waste composted instead of landfilled (MTCC missions reductions from green waste composted instead of landfilled (MTCC missions reductions from green waste composted instead of landfilled (MTCC missions reductions from green waste composted instead of landfilled (MTCC missions reductions from green waste composted instead of landfilled (MTCC missions reductions from green waste composted instead of landfilled (MTCC missions reductions from green waste composted instead of landfilled (MTCC missions reductions from green waste composted instead of landfilled (MTCC missions reductions from green waste composted instead of landfilled (MTCC missions reductions from green waste composted instead of landfilled (MTCC missions reductions from green waste composted instead of landfilled (MTCC missions reductions from green waste composted instead of landfilled (MTCC missions reductions from green waste composted instead of landfilled (MTCC missions reductions from green waste composted instead of landfilled (MTCC missions reductions from green waste composted instead of landfilled (MTCC missions reductions from green waste composted instead of landfilled (MTCC missions reductions from green waste composted instead of landfilled (MTCC missions reductions from green waste composted instead of landfilled (MTCC missions reductions from green waste composted instead of	279.25  3,504.26 1,404.81 4,909  0.015658183 0.006658732  55 9  1,372	2,346.05 703.81 8,243 4,675 12,919 0.015658183 0.006658732 129 31 3,227	2,544.33 1,526.60 8,940 5,834 14,774 0.015658183 0.006658732 140 39	3,245.52 973.66 11,404 6,468 17,872 0.015658183 0.006658732 179 43 4,464 1,077
OTAL ORGANICS COMPOSTED INSTEAD OF LANDFILLED under SW-2  Food Green	279.25  3,504.26 1,404.81 4,909  0.015658183 0.006658732  55 9  1,372 234	2,346.05 703.81 8,243 4,675 12,919 0.015658183 0.006658732 129 31 3,227 778	2,544.33 1,526.60 8,940 5,834 14,774 0.015658183 0.006658732 140 39 3,500 971	75% 3,245.52 973.66  11,404 6,468 17,872  0.015658183 0.006658732  179 43 4,464 1,077 5,541

### Water and Wastewater Reduction Measure Quantification

Assumptions				
	2020	2030	2035	2050
SMUD Average Electricity Emissions Factor (MTCO2e/MWh)	0.240	0.179	0.179	0.179
Natural Gas Emissions Factor (MTCO2e/therm)		0.00685		
W-1 Increase Water Efficiency in New Residential Development				

	Mandatory Regmt/	Measure Reqmt/Energy Star			
	Standard Equivalent		Requirement Metric		
Kitchen Faucet Flow Rate (gal per minute)	1.8	1.5	Flow Rate		
Dishwasher water use (gal/cycle)	5	3.5	Energy Star Appliance - standa	ard size	
Dishwasher energy use (kWh/year)	307		Energy Star Appliance - standa		
Clotheswasher water use (gal/cycle)	16.82		Energy Star Appliance - 2.5 cu	-ft front loading	
Clotheswasher energy use (kWh/cycle)	7.93	5.95	Energy Star Appliance		
Kitchen faucet water use per day per household with dishwasher (HH) (minutes)	5	Assumption based on water us percapita.html. Assumes water			ater.usgs.gov/edu/qa-home-
Average dishwasher cycles per unit per year Average dishwasher cycles per year per HH	215 215		vw.energystar.gov/products/a	ppliances/dishwashers/key_p	roduct_criteria
Average American family wash loads per year Average clotheswasher cycles per year per HH	300 https://www.energystar.gov/products/appliances/clothes_washers 300				
	2014	2020	2030	2035	2050
Households in Folsom	26,192		35,004	38,324	50,297
Number of new households since 2014	20,132	527	1,542	2,123	4,218
Percent of new households measure applies to		17.5%	17.5%	17.5%	17.5%
Activity in New Households Only					
Water use with standard equipment (MG/year)					
Kitchen Faucets			5	7	14
Dishwashers			2	2	5
Clotheswashers			8	11	21
Total			15	20	40
Water use with Tier 1 equipment (MG/year) Kitchen Faucets			4	6	12
Dishwashers			1	2	3
Clotheswashers			4	6	12
Total			10	13	26
Water Savings (MG/year)					
Kitchen Faucets			1	1	2
Dishwashers			0	1	1
Clotheswashers			4	5	10
Total			5	7	13
Emissions per gallon of water (MTCO2e/MG) (see calculation in measure W-4)			0.22	0.22	0.22
GHG Reductions from W-1 Increase Water Efficiency in New Residentia	For water				
Development (MTCO2e)	reductions only	-	1	1	3
Florida Company (1) Anna Company (1) Ann		Note that this measure will no	ot be in effect until after 2020.		
Electricity use with standard equipment (kWh/year)  Dishwashers			473,125	651,406	1,294,285
Clotheswashers			3,670,047	5,052,978	10,039,816
Total			4,143,172	5,704,384	11,334,101
Electricity use with Tier 1 equipment (kWh/year)			1,-1-,-1	2,121,221	,
Dishwashers			416,350	573,237	1,138,971
Clotheswashers			2,752,535	3,789,734	7,529,862
Total			3,168,885	4,362,971	8,668,833
Electricity Savings (kWh/year)					
Dishwashers			56,775	78,169	155,314
Clotheswashers Total			917,512 974,287	1,263,245 1,341,413	2,509,954 2,665,268
	Assumed to be included in E-1 Improve Building				
GHG Reductions from W-1 Increase Water Efficiency in New Residentia				2.0	
Development (MTCO2e)	New Development	-	174	240	477

### Water and Wastewater Reduction Measure Quantification (Continued)

V-2 Reduce Outdoor Water Use	2014	2020	2030	2035	205
his measure only applies to potable water use in outdoor landscaping, a					
Residential and Non-residential Landscape irrigation water use per					
capita per day (gallons) (Assumed for 2014)	94 Source: Co	alifornia Water Plan Update 20	013 Vol. 3. Table 3-2. Based on	2009 gallons and population.	
Folsom Population	73,334	80,833	95,074	103,110	131,526
Estimated annual water demand for landscaping based on 2014 rates					
(MG)	2,521	2,779	3,269	3,545	4,522
In existing development		2,521	2,521	2,521	2,521
In new development		258	748	1,024	2,001
Percent reduction in outdoor landscaping water use rates from 2014 rates					
In existing development		0%	40%	40%	409
In new development		0%	40%	40%	409
Annual Water Reduction (MG)					
In existing development		-	1,009	1,009	1,009
In new development		-	299	410	800
TOTAL		-	1,308	1,418	1,809
Emissions per gallon of water (MTCO2e/MG) (see calculation in					
measure W-4)		0.30	0.22	0.22	0.22
Remaining water use for landscape irrigation (MG)					
In existing development		2,521	1,513	1,513	1,513
In new development		258	449	614	1,201
in new development		230	443	014	1,201
GHG Reductions from W-2 Reduce Outdoor Water Use (MTCO2e)		-	293	309	394
Electricity savings from local water distribution and treatment (MWh) to calculate E-4 Increase Use of Renewable Energy in					
Electricity savings from local water distribution and treatment			1,181	1,281	1,633
Electricity savings from local water distribution and treatment (MWh) to calculate E-4 Increase Use of Renewable Energy in Existing Development	2014	- 2020	1,181 2030	1,281 2035	1,633 205
Electricity savings from local water distribution and treatment (MWh) to calculate E-4 Increase Use of Renewable Energy in Existing Development	2014	2020			
Electricity savings from local water distribution and treatment (MWh) to calculate E-4 Increase Use of Renewable Energy in Existing Development	2014	<b>2020</b>			
Electricity savings from local water distribution and treatment (MWh) to calculate E-4 Increase Use of Renewable Energy in Existing Development  N-3 Reduce Potable Water Consumption at City Facilities			2030	2035	2056
Electricity savings from local water distribution and treatment (MWh) to calculate E-4 Increase Use of Renewable Energy in Existing Development  W-3 Reduce Potable Water Consumption at City Facilities  mported Potable water consumption at all City facilities (Million gallons)	2,014	2,220	<b>2030</b> 2,613	<b>2035</b> 2,834	<b>205</b> 6
Electricity savings from local water distribution and treatment (MWh) to calculate E-4 Increase Use of Renewable Energy in Existing Development  N-3 Reduce Potable Water Consumption at City Facilities  mported Potable water consumption at all City facilities (Million gallons) Forecasting method: Employee growth  Electricity Use from Potable Water Consumption (MWh)	2,014 34,800	2,220 38,368	2030 2,613 45,145	2035 2,834 48,970	3,617 62,50
Electricity savings from local water distribution and treatment (MWh) to calculate E-4 Increase Use of Renewable Energy in Existing Development  W-3 Reduce Potable Water Consumption at City Facilities  Imported Potable water consumption at all City facilities (Million gallons)  Forecasting method: Employee growth  Electricity Use from Potable Water Consumption (MWh)	2,014 34,800	2,220 38,368	2030 2,613 45,145	2035 2,834 48,970	3,617 62,50
Electricity savings from local water distribution and treatment (MWh) to calculate E-4 Increase Use of Renewable Energy in Existing Development  N-3 Reduce Potable Water Consumption at City Facilities  mported Potable water consumption at all City facilities (Million gallons) Forecasting method: Employee growth  Electricity Use from Potable Water Consumption (MWh)	2,014 34,800	2,220 38,368	2030 2,613 45,145	2035 2,834 48,970	3,617 62,50
Electricity savings from local water distribution and treatment (MWh) to calculate E-4 Increase Use of Renewable Energy in Existing Development  N-3 Reduce Potable Water Consumption at City Facilities  Imported Potable water consumption at all City facilities (Million gallons)  Forecasting method: Employee growth  Electricity Use from Potable Water Consumption (MWh)  Electricity intensity per million gallons of imported potable water includes conveyance, treatment, and distribution)  Water Activity	2,014 34,800 1,819 kWh/MG	2,220 38,368	2030 2,613 45,145	2035 2,834 48,970	3,617 62,50
Electricity savings from local water distribution and treatment (MWh) to calculate E-4 Increase Use of Renewable Energy in Existing Development  N-3 Reduce Potable Water Consumption at City Facilities  Imported Potable water consumption at all City facilities (Million gallons) Forecasting method: Employee growth  Electricity Use from Potable Water Consumption (MWh)  Electricity intensity per million gallons of imported potable water includes conveyance, treatment, and distribution)  Water Activity  Local water distribution	2,014 34,800 1,819 kWh/MG	2,220 38,368	2030 2,613 45,145	2035 2,834 48,970	3,617 62,50
Electricity savings from local water distribution and treatment (MWh) to calculate E-4 Increase Use of Renewable Energy in Existing Development  N-3 Reduce Potable Water Consumption at City Facilities  Imported Potable water consumption at all City facilities (Million gallons) Forecasting method: Employee growth  Electricity Use from Potable Water Consumption (MWh)  Electricity intensity per million gallons of imported potable water includes conveyance, treatment, and distribution)  Water Activity  Local water distribution  Conventional water treatment	2,014 34,800 1,819 kWh/MG 64 839	2,220 38,368	2030 2,613 45,145	2035 2,834 48,970	3,617 62,50
Electricity savings from local water distribution and treatment (MWh) to calculate E-4 Increase Use of Renewable Energy in Existing Development  N-3 Reduce Potable Water Consumption at City Facilities  Imported Potable water consumption at all City facilities (Million gallons) Forecasting method: Employee growth  Electricity Use from Potable Water Consumption (MWh)  Electricity intensity per million gallons of imported potable water includes conveyance, treatment, and distribution)  Water Activity  Local water distribution	2,014 34,800 1,819 kWh/MG	2,220 38,368	2030 2,613 45,145	2035 2,834 48,970	3,617 62,50
Electricity savings from local water distribution and treatment (MWh) to calculate E-4 Increase Use of Renewable Energy in Existing Development  W-3 Reduce Potable Water Consumption at City Facilities  Imported Potable water consumption at all City facilities (Million gallons) Forecasting method: Employee growth  Electricity Use from Potable Water Consumption (MWh)  Electricity intensity per million gallons of imported potable water includes conveyance, treatment, and distribution)  Water Activity  Local water distribution Conventional water treatment Total (kWh/MG)	2,014 34,800 1,819 kWh/MG 64 839 903	2,220 38,368	2030 2,613 45,145	2035 2,834 48,970	3,617 62,50
Electricity savings from local water distribution and treatment (MWh) to calculate E-4 Increase Use of Renewable Energy in Existing Development  N-3 Reduce Potable Water Consumption at City Facilities  Imported Potable water consumption at all City facilities (Million gallons) Forecasting method: Employee growth  Electricity Use from Potable Water Consumption (MWh)  Electricity intensity per million gallons of imported potable water includes conveyance, treatment, and distribution)  Water Activity  Local water distribution Conventional water treatment Total (kWh/MG) Total (MWh/MG)	2,014 34,800 1,819 kWh/MG 64 839 903	2,220 38,368	2030 2,613 45,145	2035 2,834 48,970	3,617 62,50
Electricity savings from local water distribution and treatment (MWh) to calculate E-4 Increase Use of Renewable Energy in Existing Development  N-3 Reduce Potable Water Consumption at City Facilities  Imported Potable water consumption at all City facilities (Million gallons) Forecasting method: Employee growth  Electricity Use from Potable Water Consumption (MWh)  Electricity intensity per million gallons of imported potable water includes conveyance, treatment, and distribution)  Water Activity  Local water distribution Conventional water treatment Total (kWh/MG) Total (MWh/MG)	2,014 34,800 1,819 kWh/MG 64 839 903	2,220 38,368 2,005	2,613 45,145 2,359	2,834 48,970 2,559	3,617 62,50 3,266
Electricity savings from local water distribution and treatment (MWh) to calculate E-4 Increase Use of Renewable Energy in Existing Development  W-3 Reduce Potable Water Consumption at City Facilities  Imported Potable water consumption at all City facilities (Million gallons) Forecasting method: Employee growth  Electricity Use from Potable Water Consumption (MWh)  Electricity intensity per million gallons of imported potable water includes conveyance, treatment, and distribution)  Water Activity  Local water distribution Conventional water treatment Total (kWh/MG) Total (kWh/MG)  Percent reduction in potable water consumption at City facilities below 2014 levels Vater reduction (MG) Electricity Use with water reduction (MWh)	2,014 34,800 1,819 kWh/MG 64 839 903	2,220 38,368 2,005 15% 302 273	2030 2,613 45,145 2,359 20% 403 364	2035 2,834 48,970 2,559 30% 604 546	3,617 62,503 3,266 309 604 546
Electricity savings from local water distribution and treatment (MWh) to calculate E-4 Increase Use of Renewable Energy in Existing Development  W-3 Reduce Potable Water Consumption at City Facilities  Imported Potable water consumption at all City facilities (Million gallons) Forecasting method: Employee growth  Electricity Use from Potable Water Consumption (MWh)  Electricity intensity per million gallons of imported potable water includes conveyance, treatment, and distribution)  Water Activity  Local water distribution Conventional water treatment Total (kWh/MG) Total (MWh/MG)  Percent reduction in potable water consumption at City facilities below 1014 levels Water reduction (MG)	2,014 34,800 1,819 kWh/MG 64 839 903	2,220 38,368 2,005	2,613 45,145 2,359	2,834 48,970 2,559	3,617 62,50: 3,266
Electricity savings from local water distribution and treatment (MWh) to calculate E-4 Increase Use of Renewable Energy in Existing Development  W-3 Reduce Potable Water Consumption at City Facilities  Imported Potable water consumption at all City facilities (Million gallons) Forecasting method: Employee growth  Electricity Use from Potable Water Consumption (MWh)  Electricity intensity per million gallons of imported potable water includes conveyance, treatment, and distribution)  Water Activity  Local water distribution  Conventional water treatment  Total (kWh/MG)  Total (MWh/MG)  Percent reduction in potable water consumption at City facilities below 1014 levels  Water reduction (MG)  Electricity Use with water reduction (MWh)  Difference in electricity use (MWh)  GHG Reductions from W-3 Reduce Potable Water Consumption at City	2,014 34,800 1,819 kWh/MG 64 839 903	2,220 38,368 2,005 15% 302 273 1,732	2030 2,613 45,145 2,359 20% 403 364 1,996	2,834 48,970 2,559 30% 604 546 2,014	30% 604 546 2,721
Electricity savings from local water distribution and treatment (MWh) to calculate E-4 Increase Use of Renewable Energy in Existing Development  N-3 Reduce Potable Water Consumption at City Facilities  Imported Potable water consumption at all City facilities (Million gallons) Forecasting method: Employee growth  Electricity Use from Potable Water Consumption (MWh)  Electricity intensity per million gallons of imported potable water includes conveyance, treatment, and distribution)  Water Activity  Local water distribution  Conventional water treatment  Total (kWh/MG)  Total (MWh/MG)  Percent reduction in potable water consumption at City facilities below 1014 levels  Vater reduction (MG)  Electricity Use with water reduction (MWh)  Difference in electricity use (MWh)	2,014 34,800 1,819 kWh/MG 64 839 903	2,220 38,368 2,005 15% 302 273	2030 2,613 45,145 2,359 20% 403 364	2035 2,834 48,970 2,559 30% 604 546	3,617 62,503 3,266 309 604 546
Electricity savings from local water distribution and treatment (MWh) to calculate E-4 Increase Use of Renewable Energy in Existing Development  W-3 Reduce Potable Water Consumption at City Facilities  Imported Potable water consumption at all City facilities (Million gallons) Forecasting method: Employee growth  Electricity Use from Potable Water Consumption (MWh)  Electricity intensity per million gallons of imported potable water includes conveyance, treatment, and distribution)  Water Activity  Local water distribution  Conventional water treatment  Total (kWh/MG)  Total (MWh/MG)  Percent reduction in potable water consumption at City facilities below 1014 levels  Water reduction (MG)  Electricity Use with water reduction (MWh)  Difference in electricity use (MWh)  GHG Reductions from W-3 Reduce Potable Water Consumption at City	2,014 34,800 1,819 kWh/MG 64 839 903	2,220 38,368 2,005 15% 302 273 1,732	2030 2,613 45,145 2,359 20% 403 364 1,996	2,834 48,970 2,559 30% 604 546 2,014	30% 604 546 2,721
Electricity savings from local water distribution and treatment (MWh) to calculate E-4 Increase Use of Renewable Energy in Existing Development  W-3 Reduce Potable Water Consumption at City Facilities  Imported Potable water consumption at all City facilities (Million gallons) Forecasting method: Employee growth  Electricity Use from Potable Water Consumption (MWh)  Electricity intensity per million gallons of imported potable water includes conveyance, treatment, and distribution)  Water Activity  Local water distribution  Conventional water treatment Total (kWh/MG) Total (kWh/MG)  Percent reduction in potable water consumption at City facilities below 2014 levels Vater reduction (MG) Electricity Use with water reduction (MWh) Difference in electricity use (MWh)  GHG Reductions from W-3 Reduce Potable Water Consumption at City facilities (MTCO2e)	2,014 34,800 1,819 kWh/MG 64 839 903	2,220 38,368 2,005 15% 302 273 1,732	2030 2,613 45,145 2,359 20% 403 364 1,996	2,834 48,970 2,559 30% 604 546 2,014	30% 604 546 2,721

Assumptions				
Category	Value			
Conversions				
sqin/sqft	144			
cubic in/gallons	231			
sqft/acre	43560			
acre/hectare	2.47105			
g/MT	1000000			
lb/MT	2204.622622			
g/lb	453.592			
kg/MT	1000			
lb/kg	2.20462			
tons/MT	1.10231			
kWh/MWh	1000			
MWh/GWh	1000			
btu/kWh	3412.14			
Btu/therm	100000			
MMBtu/therm	0.1			
MMBtu/MWh	3.41214148			
LPG Gallons/GGE	1.344086022			
LNG Gallons/GGE	1.572327044			
gal/cubic foot	7.480519481			
gal/Liter	3.785411784			
gallon/acrefoot	325851.429			
million gal/hundred cubic feet	0.000748503			
million gal/acre-feet	0.325851429			
GWP				
CO2	1			
CH4	25			
N2O	298			
Source	IPCC Fourth Assessment Report			

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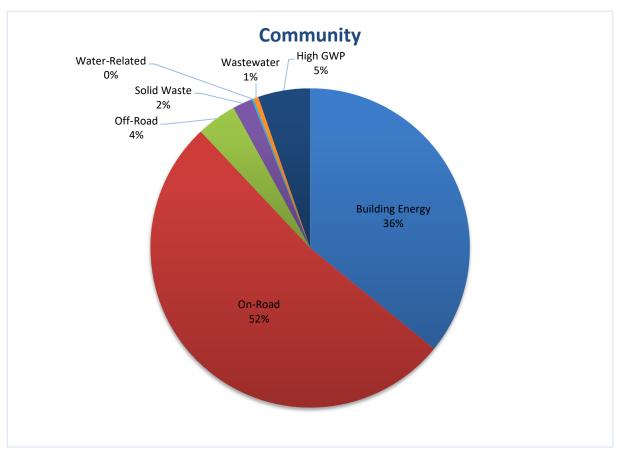
Community	<u>2014</u>	<u>2020</u>	<u>2030</u>	<u>2035</u>	<u>2050</u>	
Building Energy	235,955	261,730	311,117	339,213	439,718	36%
On-Road	342,865	353881	385554	406398	491608	52%
Off-Road	26,683	29,417	34,611	37,542	47,911	4%
Solid Waste	13,073	14,410	16,949	18,382	23,447	2%
Water-Related	1,325	1,460	1,718	1,863	2,376	0.2%
Wastewater	3,282	3,618	4,256	4,615	5,887	0.50%
High GWP	34,708	38,257	44,997	48,800	62,249	5%
_						
Without Legislative Reductions	657,892	702,774	799,201	856,813	1,073,197	
Targets	657,892					
Municipal						
	<u>2014</u>	2020	<u>2030</u>	<u>2035</u>	<u>2050</u>	
Building Energy	2,137	2,356	2,771	3,005	3,834	29%
On-Road	4,247	4,681	5,506	5,972	7,617	57%
Off-Road	138	152	179	194	247	2%
Solid Waste	71	78	92	100	128	1%
Traffic Signals	101	111	131	142	181	1%
Street Lights	727	801	942	1,022	1,303	10%
Water-Related	15	16	19	21	27	0%
Wastewater	33	36	42	46	58	0%
Without Legislative Reductions	7,469	8,232	9,683	10,501	13,395	
Targets	7,469					
raigets	7,403					
Community						
Built Environment/Transportation	404,256	421,555	465,162	492,741	601,769	
Energy	235,955	261,730	311,117	339,213	439,718	
Solid Waste	13,073	14,410	16,949	18,382	23,447	
Water and Wastewater	4,607	5,078	5,973	6,478	8,263	
	657,892	702,774	799,201	856,813	1,073,197	
Municipal						

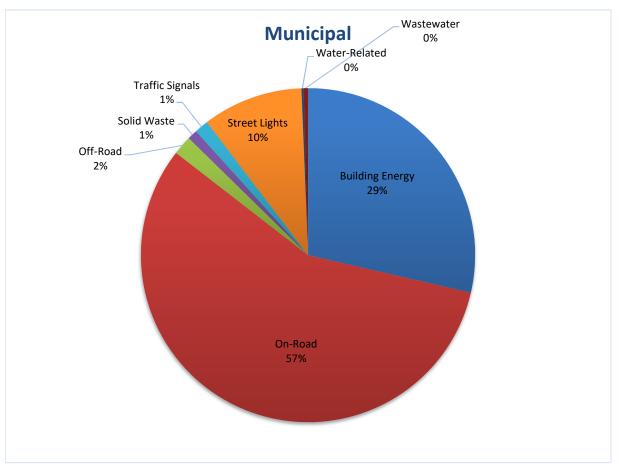
# Municipal

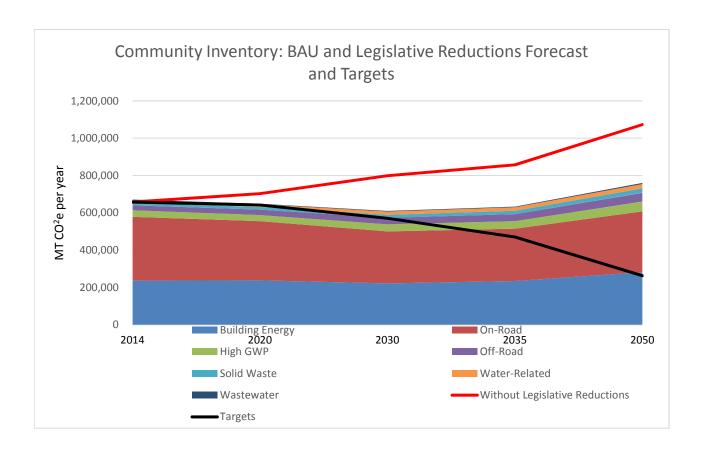
Built Environment/Transportation	5,213
Energy	2,137
Solid Waste	71
Water and Wastewater	47
	7,469

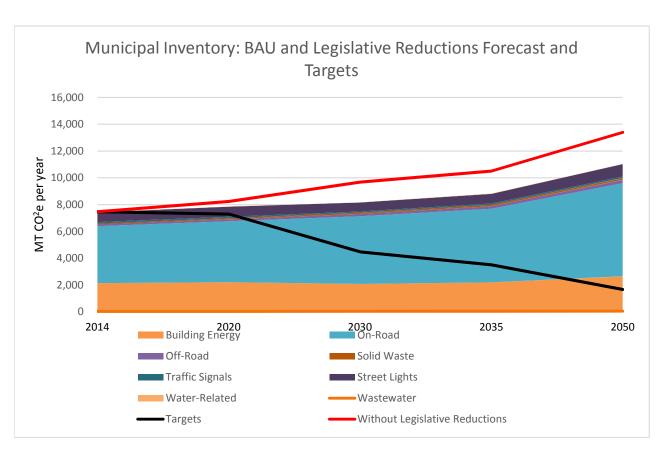
## WITH LEGISLATIVE REDUDUCTIONS

<u>2020</u>	<u>2030</u>	<u>2035</u>	<u>2050</u>
238,335	221,661	234,787	281,736
317,361	279019	279867	325871
29,417	34,611	37,542	47,911
14,410	16,949	18,382	23,447
1,381	1,212	1,277	1,628
3,529	3,708	4,576	5,877
31,956	37,586	40,762	51,996
636,389	594,745	617,192	738,467
-3.3	-9.6	-6.2	12.2
642,246	570,447	470,080	263,052
<u>2020</u>	<u>2030</u>	<u>2035</u>	<u>2050</u>
2,200	2,070	2,196	2,641
4,548	5,052	5,491	6,958
152	179	194	247
78	92	100	128
105	92	100	128
756	665	721	919
15	14	15	19
34	32	36	46
7,889	8,196	8,852	11,086
5.6	9.7	18.5	48.4
7,291	4,468	3,511	1,663
- ,	.,	-,	_,
378,734	351,216	358,172	425,778
238,335	221,661	234,787	281,736
14,410	16,949	18,382	23,447
4,910	4,920	5,852	7,506
636,389	594,745	617,192	738,467
,	, -	, -	,
5,561	5,988	6,506	8,252
2,200	2,070	2,196	2,641
2,200 78	92	100	128
78 50	92 46	51	65
7,889	8,196	8,852	11,086
1,005	0,150	0,032	11,000









Per-capita GHG Reduction Targets			
Milestone Year	State Targets for Local Level Climate Action Plans (MTCO2e/cap)		
2030	6		
2035	4.6		
2050	2		

Source: ARB. Public Workshop on the 2030 Target Scoping Plan November 7, 2016

GHG Reduction Targets			
			Adjusted Target
		Statewide Target Percent	Percent Reduction
	Statewide Existing and Target	Reduction below 1990	below 2014 levels by
Milestone Year	Emissions (MMTCO2e)	levels by Target Years	Target Years
1990 (Historical)	431	NA	NA
2014 (Historical)	442	NA	NA
2020 (Target)	431	0%	2.4%
2030 (Target)*	264.12	40.0%	40.2%
2035 (Target)	207.53	51.8%	53.0%
2050 (Target)*	98.32	80.0%	77.7%

<sup>\*</sup> State emissions calculated from ARB's scoping plan community-wide per-capita goal and population forecasts from the Department of Finance Source: California GHG Inventory. ARB 2014 and 2016

Demographics	Value	Source
2030 Statewide Population		44,019,846 Department of Finance
2035 Statewide Population		45,521,334 Department of Finance
2050 Statewide Population		49,158,401 Department of Finance

-0.053449177

City of Folsom					
Community Inventory	2014	2020	2030	2035	2050
Population	73,334	80,833	95,074	103,110	131,526
BAU Emissions (MTCO2e)	657,892	702,774	799,201	856,813	1,073,197
Per capita emissions	9.0	8.7	8.4	8.3	8.2
BAU with Legislative Reductions (MTCO2e)	657,892	636,389	594,745	617,192	738,467
Per capita emissions	9.0	7.9	6.3	6.0	5.6
With Measures (MTCO2e)					
Per capita emissions					
Percent below BAU					
Municipal Inventory					
BAU Emission	7,469	8,232	9,683	10,501	13,395
With Leg Reduction	7,469	7,889	8,196	8,852	11,086
Community Targets		2020	2030	2035	2050
Per Capita		0	6	4.6	2
Mass Emissions		642,246	570,447	470,080	263,052
Needed Reductions		(5,857)	24,299	147,112	475,415
Municipal Targets					
Mass Emissions		7,291	4,468	3,511	1,663
Needed Reductions		-598	3,728	5,342	9,423

### Municipal

Folsom E	Folsom Employee Commute Emissions		2014	
	2014 Employee VMT 2,214,452	<b>2014 Total Trips</b> 174,756		
CO2 CH4 N2O	grams 800486486.4 30418.36302 15995.33561	MT 800.4864864 0.030418363 0.015995336		
TOTAL			806	CO2E MT

			3,441	CO2E MT
	1422	2019		
N2O	30879.66112	64962.3666	0.09584203	
CH4	57566.79366	1009086.895	1.06665369	
CO2	1420438098	1974697348	3395.13545	
	grams	grams	MT	
	168005.5	195905.81		
	Total Gas (gal)	Total DSL (gal)		
Folsom	On Road Fleet			
			2014	

Folsom Off Road Equipment			2014	
	Total Gas (gal)	Total DSL (gal) 11681.95		
	grams	grams	MT	
CO2	17336988.00	119272709.50	136.609698	
CH4	1145.27	5840.98	0.00698624	
N2O	513.40	2570.03	0.00308343	
			138	CO2E MT

### **Community Wide**

# 2015 Folsom Community Wide On Road Transportaion Emissions

2014	Annual	VMT

2014	Annual VMT					
Speed Bin						
	2015	CO2	CH4	N2O	g CO2E	MT CO2E
5	529,838	966543756	343430.567	650479.917	1168972535	1168.97254
10	1,639,448	2359074143	555052.928	1403079.7	2791068215	2791.06822
15	5,891,234	5476579135	784675.368	3114487.89	6424313410	6424.31341
20	63,783,538	46670634890	8725170.42	17575615.2	52126297468	52126.2975
25	52,457,673	27085695009	1414394.8	4683584.81	28516763154	28516.7632
30	55,613,407	26322533974	1237728.33	6793070.64	28377812233	28377.8122
35	99,692,744	41404476509	1840716.02	7532740.75	43695251152	43695.2512
40	98,988,501	37540576182	1561840.94	6049139.14	39382265670	39382.2657
45	94,908,364	38192186013	1419636.51	10205972.9	41269056840	41269.0568
50	27,424,755	11274496416	387267.217	3785840.33	12412358514	12412.3585
55	51,391,083	20492070178	723402.811	4710785.98	21913969470	21913.9695
60	104,028,520	41653843199	1598423.14	5820766.03	43428392053	43428.3921
65	36,600,160	17639049351	645847.257	3626193.64	18735801238	18735.8012
70	1,704,660	744609065	29281.3948	16704.4864	750,319,037	750.319037
	694,653,925					
	TOTAL				3.40993E+11	340,993

Electric VMT	CO2	CH4	N2O	g CO2E	MT CO2e
20,776,454	1,811,143,501	92,629	196,053	1,871,883,041	1871.8830