DIXON CITY COUNCIL

RESOLUTION NO. 25-005

A RESOLUTION OF THE DIXON CITY COUNCIL ADOPTING AN ADDENDUM TO THE ENVIRONMENTAL IMPACT REPORT FOR THE NORTHEAST QUADRANT SPECIFIC PLAN, IN CONNECTION WITH THE AMENDMENTS TO THE NORTHEAST QUADRANT SPECIFIC PLAN RELATED TO INDUSTRIAL GENERAL DEVELOPMENT OF 37.5 ACRES LOCATED ON THE WEST SIDE OF PEDRICK ROAD, 1,000 FEET SOUTH OF INTERSTATE 80 (APN: 0111-010-080)

* *

WHEREAS, on May 9, 1995, the City adopted the Northeast Quadrant Specific Plan (NQSP) pursuant to Resolution 95-63, with multiple amendments made to the NQSP since its original adoption; and

WHEREAS, as part of the original action adopting the NQSP, the City Council certified an Environmental Impact Report (EIR) pursuant to the California Environmental Quality Act (CEQA), State Clearinghouse No. 92113073. This action included required CEQA findings, adoption of a Mitigation Monitoring and Reporting Program ("MMRP"), and adopted a Statement of Overriding Consideration for the NQSP project; and

WHEREAS, on May 18, 2021, the City of Dixon adopted *Dixon General Plan 2040*, a comprehensive update to the City's General Plan. Through the updated General Plan, the land use designation for the subject 37.5-acre site in the NQSP was changed from "Employment" to "Industrial"; and

WHEREAS, on May 7, 2024, as an implementation action of the General Plan update, the City of Dixon adopted a comprehensive update to the Zoning Ordinance and Zoning Map. One of the numerous updates to the Zoning Ordinance and Map was to change the zoning for this subject site from "Highway Commercial" to "General Industrial -Northeast Quad Specific Plan overlay" (IG-NQSP). The rezoning aligned the Zoning to match the updated General Plan land use designation; and.

WHEREAS, the recent updates to the Geneal Plan and Zoning Ordinance/Map have resulted in an inconsistency of the Specific Plan designation and standards with the updated General Plan and Zoning Ordinance; and

WHEREAS, the applicant, Buzz Oates Construction, Inc., has proposed a series of amendments to the NQSP focused on 37.5 acres zoned Industrial General – NQSP Overlay, (the "project") to revise the Specific Plan to be in conformance with the General Plan land use designation and Zoning designation assigned to this site, through the recent updates to the Dixon General Plan and Comprehensive Update to the Zoning Ordinance; and

WHEREAS, on January 2, 2024 the City initiated requests to all potentially affected tribes for SB 18 tribal consultations, and on May 16, 2024, the City conducted a consultation with the Yoche Dehe Tribe (YD-09132022-02) and received a letter dated May 16, 2024 citing their request for mitigation measures to be included in the Addendum. These measures have been incorporated into the Addendum to the EIR; and

WHEREAS, the City evaluated the project to determine the necessary CEQA documentation. Section 15164 of the CEQA Guidelines provides that an Addendum to a previously adopted Environmental Impact Report may be prepared if only minor technical changes or additions to the project are necessary or none of the conditions described in CEQA Guidelines section 15162 calling for the preparation of a subsequent Environmental Impact Report have occurred; and

WHEREAS, the Planning Division, through it's CEQA Consultant, Raney Planning and Management, has prepared an Addendum to the Northeast Quadrant Specific Plan EIR for the Project, attached and incorporated hereto as **Exhibit A**. The Addendum determines that the Project will not result in new significant adverse impacts to the environment, and none of the conditions described in CEQA Guidelines section 15162 apply to the Project; and

WHEREAS, on November 27, 2024, the City published the Initial Study/ Addendum to the Northeast Quadrant Specific Plan EIR for public review and provided notice of the availability of the document through mailed public notice and notice in the local newspaper; and

WHEREAS, on December 10, 2024, following notification in the prescribed manner, the Dixon Planning Commission conducted a public hearing, at which the Planning Commission received a staff report, considered the Project, including the Addendum to the Initial Study/Addendum to EIR, and received public testimony and evidence; and

WHEREAS, on December 10, 2024, following the public hearing, the Dixon Planning Commission unanimously voted (6-0) to adopt the following Resolutions recommending approval of the project to the City Council:

- Resolution No. 2024-011 recommending to the City Council adoption of an Addendum to the Addendum to the Northeast Quadrant Specific Plan EIR (*SCH # 2022010090*); and
- Resolution No. 2023-012 recommending to the City Council approval of the proposed amendments to the Northeast Quadrant Specific Plan

WHEREAS, on January 7, 2025, the Dixon City Council held a duly noticed public hearing, to consider the merits of the project, and hear testimony in favor of and in opposition to the project. The Community Development Department provided public notice identifying the applicant, describing the project and its location, and the date of

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the public hearing prior to the hearing. This notice, including the notice of intent to adopt the Addendum to the NEQ Specific Plan EIR, was mailed to all property owners within 500 feet of the subject property and published in the Dixon Independent Voice newspaper on December 27, 2024; and

WHEREAS, on January 7, 2025, the Dixon City Council, by adoption of a separate Ordinance approved the proposed amendments to the Northeast Quadrant Specific Plan; and

WHEREAS, the custodian of documents which constitute the record of proceedings upon which this decision is based is the Community Development Department.

NOW, THEREFORE BE IT RESOLVED, the Dixon City Council, based on its independent review and judgment hereby finds and determines that, based on substantial evidence in the record:

1. The Addendum attached hereto as **Exhibit A** has been prepared for the Project in compliance with CEQA. The Addendum demonstrates that the analysis contained in the Northeast Quadrant Specific Plan EIR (*SCH# 92113073*), together with the analysis contained in the Addendum, adequately addresses the potential physical impacts associated with implementation of the Project.

2. Pursuant to CEQA Guidelines sections 15164 and 15162, none of the conditions requiring preparation of a subsequent Environmental Impact Report have occurred, and the Project would not result in any new significant impacts not analyzed or considered under the Northeast Quadrant Specific Plan EIR (*SCH# 92113073*);

3. The Northeast Quadrant Specific Plan EIR (*SCH# 92113073)*, together with the Addendum for the Project, are complete and adequate documents for the purpose of complying with CEQA and considering and acting on the Project.

NOW THEREFORE BE IT FURTHER RESOLVED, the Dixon City Council adopts the Addendum to the Northeast Quadrant Specific Plan Environmental Impact Report.

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ADOPTED, at a regular meeting of the City Council of the City of Dixon, State of California, on the 7th day of January 2025.

AYES: Bogue, Ernest, Hendershot, Johnson, Bird
NOES: None
ABSENT: None
ABSTAIN: None

STEVE BIRD, MAYOR
DIXON CITY COUNCIL

Attest:

for: KRISTIN M. JANISCH
ELECTED CITY CLERK

Exhibit A: Addendum to the Northeast Quadrant Specific Plan

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EXHIBIT A

Dixon Innovation Center Project
Initial Study/Addendum
to the Northeast Quadrant Specific Plan
Environmental Impact Report (SCH# 92113073)

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City of Dixon
Community Development Department

Dixon Innovation Center Project

Initial Study/Addendum to the Northeast Quadrant Specific Plan Environmental Impact Report (SCH# 92113073)

November 2024

Prepared by

RANEY PLANNING & MANAGEMENT, INC.
25 years
1501 Sports Drive, Suite A, Sacramento, CA 95834

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APPENDICES:

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INITIAL STUDY/ADDENDUM
NOVEMBER 2024

A. BACKGROUND

1.	Project Title:	Dixon Innovation Center Project
2.	Lead Agency Name and Address:	City of Dixon Community Development Department 600 East A Street Dixon, CA 95620
3.	Contact Person and Phone Number:	Raffi Boloyan Community Development Director (707) 678-7000
4.	Project Location:	Southwest of the Pedrick Road/ Interstate 80 (I-80) Intersection Dixon, CA 95620 Assessor's Parcel Number: 0111-010-080
5.	Project Sponsor's Name and Address:	Buzz Oates Construction, Inc. 555 Capitol Mall, Suite 900 Sacramento, CA 95814
6.	Existing General Plan Designation:	Industrial
7.	Existing Zoning Designation:	General Industrial (IG-NESP)
8.	Existing Northeast Quadrant Specific Plan Designation:	Highway Commercial
9.	Proposed Northeast Quadrant Specific Plan Designation:	General Industrial

10. Surrounding Land Uses and Setting:

The approximately 37.57-acre project site, identified by Assessor's Parcel Number (APN) 0111-010-080, is located southwest of the intersection of Pedrick Road and Interstate 80 (I-80) in the City of Dixon, and is located within the City of Dixon Northeast Quadrant Specific Plan (NQSP). The project site was previously used for agricultural purposes but is currently undeveloped and consists of disked grasses. Surrounding land uses include a truck and trailer dealership to the north; undeveloped land and industrial uses to the east, across Pedrick Road; undeveloped land to the south, across from future Professional Drive, which is the subject site for the proposed The Campus Project (also was known as Dixon 257 Project); and agricultural land to the west, across I-80. The City of Dixon General Plan designates the project site as Industrial and the site is zoned General Industrial (IG). The NQSP designates the site as Highway Commercial.

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11. Project Description Summary:

The Dixon Innovation Center Project (proposed project) consists of program-level land use entitlements that are intended to bring the NQSP land use designation for the project site into conformity with the site's existing (recently updated) General Plan and zoning designations. More specifically, the proposed project includes a request to amend the NQSP to create a new General Industrial land use designation and to redesignate the site's NQSP land use designation from Highway Commercial to General Industrial. The industrial development potential identified for the project site is approximately 563,826 square feet (sf). This environmental analysis will also consider the potential environmental effects associated with off-site backbone sewer and water infrastructure improvements required to serve future industrial development on the project site, in the event that such infrastructure is not constructed by The Campus (Dixon 257) Project.

B. INTRODUCTION

This Initial Study/Addendum identifies and analyzes the potential environmental impacts of the proposed project. The information and analysis presented in this document is organized in accordance with the order of the California Environmental Quality Act (CEQA) checklist in Appendix G of the CEQA Guidelines.

Project Background

The project site is within the NQSP, which consists of approximately 643 acres located in the northeast portion of the City of Dixon. The NQSP and associated Environmental Impact Report (EIR) were adopted and certified in August 1994. The NQSP EIR was prepared as a program-level EIR, pursuant to Section 15168 of the CEQA Guidelines. The NQSP designates the project site as Highway Commercial.

The City of Dixon adopted the General Plan Update and certified the General Plan Environmental Impact Report (General Plan EIR) on May 18, 2021. The General Plan EIR was prepared as a program-level EIR, pursuant to Section 15168 of the CEQA Guidelines. As part of the General Plan Update, the City redesignated the project site from Highway Commercial to Industrial.

Rationale for the Preparation of an Addendum

In the case of a project proposal requiring discretionary approval by the City for which the City has adopted an EIR for the overall project, the City must determine whether a subsequent EIR is required. The CEQA Guidelines provide guidance in this process by requiring an examination of whether, since the certification of the EIR, changes in the approved project or circumstances under which the approved project would be undertaken have occurred to such an extent that the proposal may result in a new significant impact (not previously identified in the certified EIR) or substantial increase in the severity of a previously identified significant impact. If so, the City would be required to prepare a subsequent EIR. The examination of impacts is the first step taken by the City in reviewing the CEQA treatment of the project. The following review proceeds with the requirements of CEQA Guidelines Section 15162 as discussed in detail below.

For the purposes of this Initial Study/Addendum, the checklist to document evaluation of the proposed industrial project will be based, generally, on the Appendix G format. Modifications will be made to the checklist sections, generally consisting of additional questions related to CEQA Guidelines Section 15162. Per CEQA Guidelines Section 15064, an addendum to an adopted EIR may be prepared if only minor technical changes or additions are required, and none of the conditions identified in CEQA Guidelines Section 15162 are present. The following identifies the standards set forth in Section 15162(a):

1. *Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;*

2. *Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or*

3. *New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:*

    a) *The project will have one or more significant effects not discussed in the previous EIR or negative declaration;*

    b) *Significant effects previously examined will be substantially more severe than shown in the previous EIR [or negative declaration];*

    c) *Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or*

    d) *Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.*

The following discussion confirms that the project has been evaluated for significant impacts pursuant to CEQA. The determination in this document is that the project's impacts have been considered in a previous CEQA document (i.e., the NQSP EIR) that was certified by the City of Dixon and deemed a sufficient and adequate analysis of the environmental impacts of the Dixon Innovation Center Project. The discussion concludes that the conditions set forth in Section 15162 are not triggered by the modified project. As such, an addendum is the appropriate environmental document for the proposed project, pursuant to CEQA Guidelines Section 15164.

Use of a Prior Environmental Document

In *Friends of College of San Mateo Gardens v. San Mateo County Community College District* (2016) 1 Cal.5th 937, 951, the California Supreme Court held that a lead agency, in considering a proposed change to a previously-approved project, has the responsibility for deciding whether the environmental document for the original project retains "some relevance" to the decision-making process for the proposed change. "[W]hether an initial environmental document remains relevant despite changed plans or circumstances—like the question whether an initial environmental document requires major revisions due to changed plans or circumstances—is a predominantly factual question. It is thus a question for the agency to answer in the first instance, drawing on its particular expertise." (*Id.* at p. 952.) On this factual issue, lead agencies are entitled to considerable deference from reviewing courts: "'a court should tread with extraordinary care' before reversing an agency's determination, whether implicit or explicit, that its initial environmental document retains some relevance to the decision-making process." (*Id.* at p. 953.)

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Here, considering the quality of the certified Final EIR, the nature of the underlying program level project approved in 1994, and the programmatic nature of the proposed changes to that approved project, the City of Dixon has determined that the EIR certified for the Northeast Quadrant Specific Plan remains relevant to the proposal at hand, which does not alter the approved project footprint.

Based on the analysis set forth below, moreover, the City has also concluded that the proposed project change will not trigger the need for either a subsequent EIR or a supplement to the previously-certified 1994 Final EIR. For these reasons, the City has prepared this addendum to the 1994 EIR in order to evaluate the proposed project. The proposed modifications to the site's NQSP land use designation would result in impacts similar to those identified in the 1994 EIR.

C. PROJECT DESCRIPTION

The following provides a description of the project site's current location and setting, as well as the proposed project components.

Project Location and Setting

The approximately 37.57-acre project site, identified by APN 0111-010-080, is located southwest of the intersection of Pedrick Road and I-80 in the City of Dixon, and is located within the City of Dixon NQSP (see Figure 1). The project site was previously used for agricultural purposes but is currently undeveloped and consists of disked grasses. Surrounding land uses include a truck and trailer dealership to the north; undeveloped land and industrial uses to the east, across Pedrick Road; undeveloped land to the south, across from future Professional Drive, which is site of the proposed The Campus (Dixon 257) Project; and agricultural land to the west, across I-80 (see Figure 2). The City of Dixon General Plan designates the project site as Industrial and the site is zoned IG. The NQSP designates the site as Highway Commercial.

Project Components

The scope of this project is to align the land use designation for the project site in the NQSP to match the recently updated General Plan and Zoning Ordinance, which changed the land use and zoning for this site from Highway Commercial to Industrial. The proposed project includes a SPA to create the General Industrial land use designation and to modify the site's existing NQSP land use designation from Highway Commercial to General Industrial. The proposed General Industrial NQSP land use designation would allow for the development of a variety of large and small scale industrial, warehouse, and distribution uses, and would be generally consistent with the IG zoning designation as defined in Chapter 18.06, Industrial Districts, of the City of Dixon Municipal Code. As such, development within the proposed General Industrial NQSP land use designation would allow for development with a maximum floor area ratio (FAR) of 0.6, minimum lot size of 40,000 sf, and maximum height of 10 feet within 200 feet of a residential district, or 75 feet otherwise. Following approval of the proposed SPA, the project site's NQSP land use designation would be consistent with the site's City of Dixon General Plan land use and zoning designations. Additionally, the project includes the addition of a new Section 7 for Industrial development, addressing development standards, site planning, building design and related aspects for industrial development. No specific development is proposed as part of this project.

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Figure 1
Regional Project Location

Figure 2
Project Site Boundaries Map

**Project site boundaries are approximate.*

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Future buildout of the project site would include the development of industrial uses, consistent with the permitted uses and standards established by the existing General Plan and zoning designations, as well as the proposed NQSP land use designation. Although a site plan has not been prepared at this time, consistent with the Traffic Impact Analysis prepared for the proposed project,[1] this environmental analysis considers a future development potential for the project site of approximately 563,826 sf of industrial uses. In addition, future buildout of the project site would include the widening of the northern half of the future right-of-way (ROW) of Professional Drive along the site's southerly boundary (i.e., Pedrick Road to the southwestern corner of the project site).

As discussed above, the proposed The Campus (Dixon 257) Project is located immediately south of the project site. The Campus (Dixon 257) Project proposes multiple utilities improvements, including the development of water supply and sewer infrastructure extensions from the existing lines in Vaughn Road, the development of a stormwater retention basin, and the construction of a 1,500 gallons per minute (gpm) municipal well. Should The Campus (Dixon 257) Project be approved prior to approval of the currently proposed project, such utilities improvements would be developed as part of The Campus (Dixon 257) Project. However, if The Campus (Dixon 257) Project is not approved, or if construction of The Campus (Dixon 257) Project does not commence such that the off-site water, sewer, and drainage utilities would be built in time for the proposed project to rely on them, the Dixon Innovation Center project applicant could elect to proceed with building the necessary off-site utilities infrastructure improvements described above. As a result, the environmental analysis included for said off-site utilities in The Campus (Dixon 257) EIR is incorporated by reference in this document.

With respect to water supply infrastructure, if The Campus (Dixon 257) Project is not approved, or said project is approved but its associated water infrastructure will not be installed in sufficient time for the proposed project to proceed, the Dixon Innovation Center applicant would construct a 1,500-gpm municipal well south of the project site. In addition, a 12-inch water main would be extended south from the project site to connect to the existing 10-inch water main within Vaughn Road (see Figure 3).

With respect to sanitary sewer infrastructure, the proposed project would include the development of a sanitary sewer lift station in the southwest corner of the project site. In addition, if The Campus (Dixon 257) Project is not approved, or said project is approved but its associated sewer infrastructure will not be installed in sufficient time for the proposed project to proceed, the Dixon Innovation Center applicant would construct an off-site sewer line extension south to the existing sanitary sewer main within Vaughn Road (see Figure 4).

The proposed sewer infrastructure would serve the project site as well as the surrounding parcels to the north, west, and south of the project site. As such, the required sewer infrastructure improvements would include the installation of an eight-inch sewer line originating north of the project site, north of I-80, and would extend south within Pedrick Road before branching west into a 10-inch sewer line within the future Professional Drive, which would run along the site's southern boundary, before discharging into the aforementioned on-site lift station. From the lift station, the sewer line would vary in size and extend south to the existing 18-inch sewer line within Vaughn Road.

[1] Flecker Associates. *Traffic Impact Analysis for Dixon Innovation Center*. November 27, 2023.

Figure 3
Potential Water Infrastructure

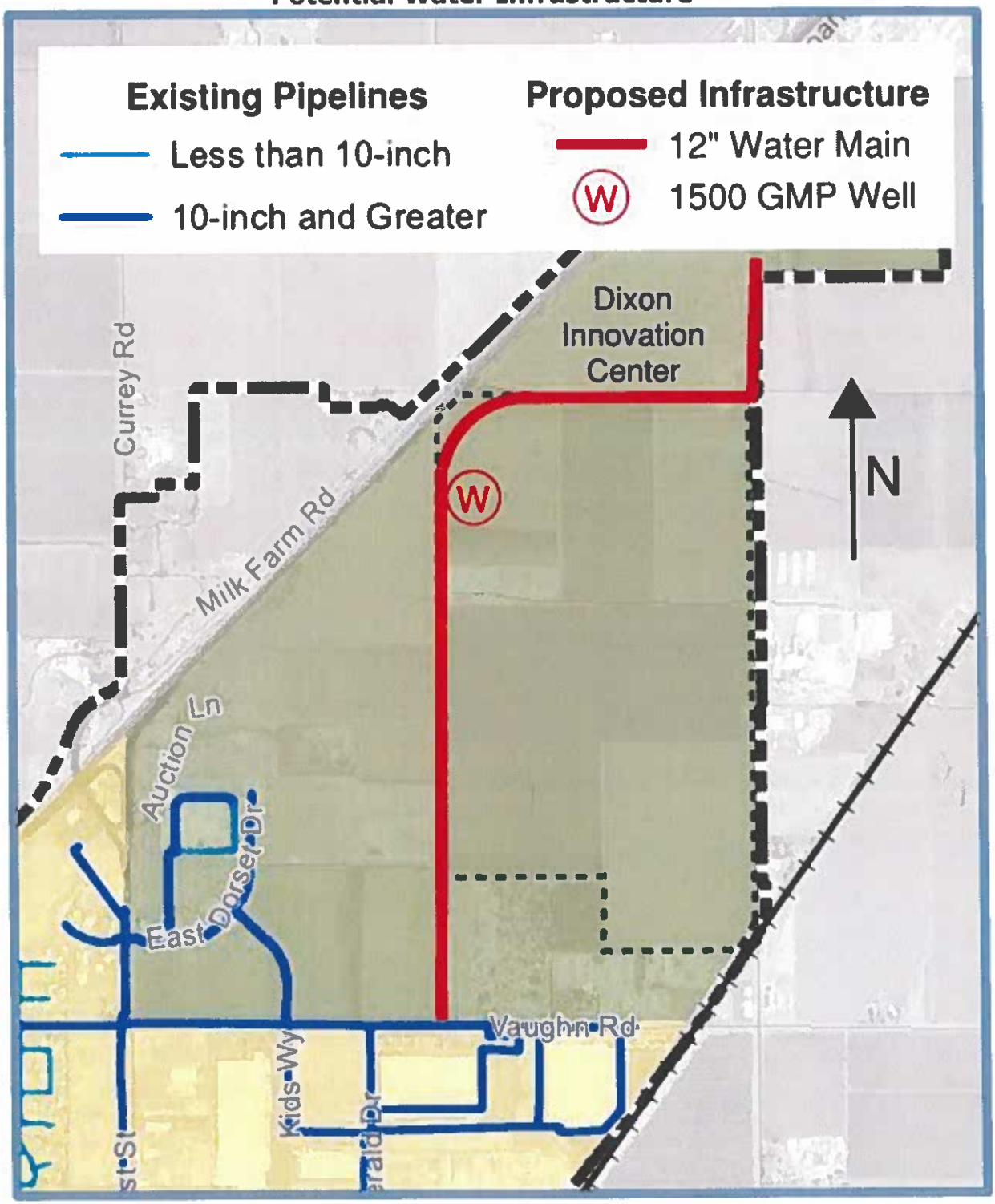

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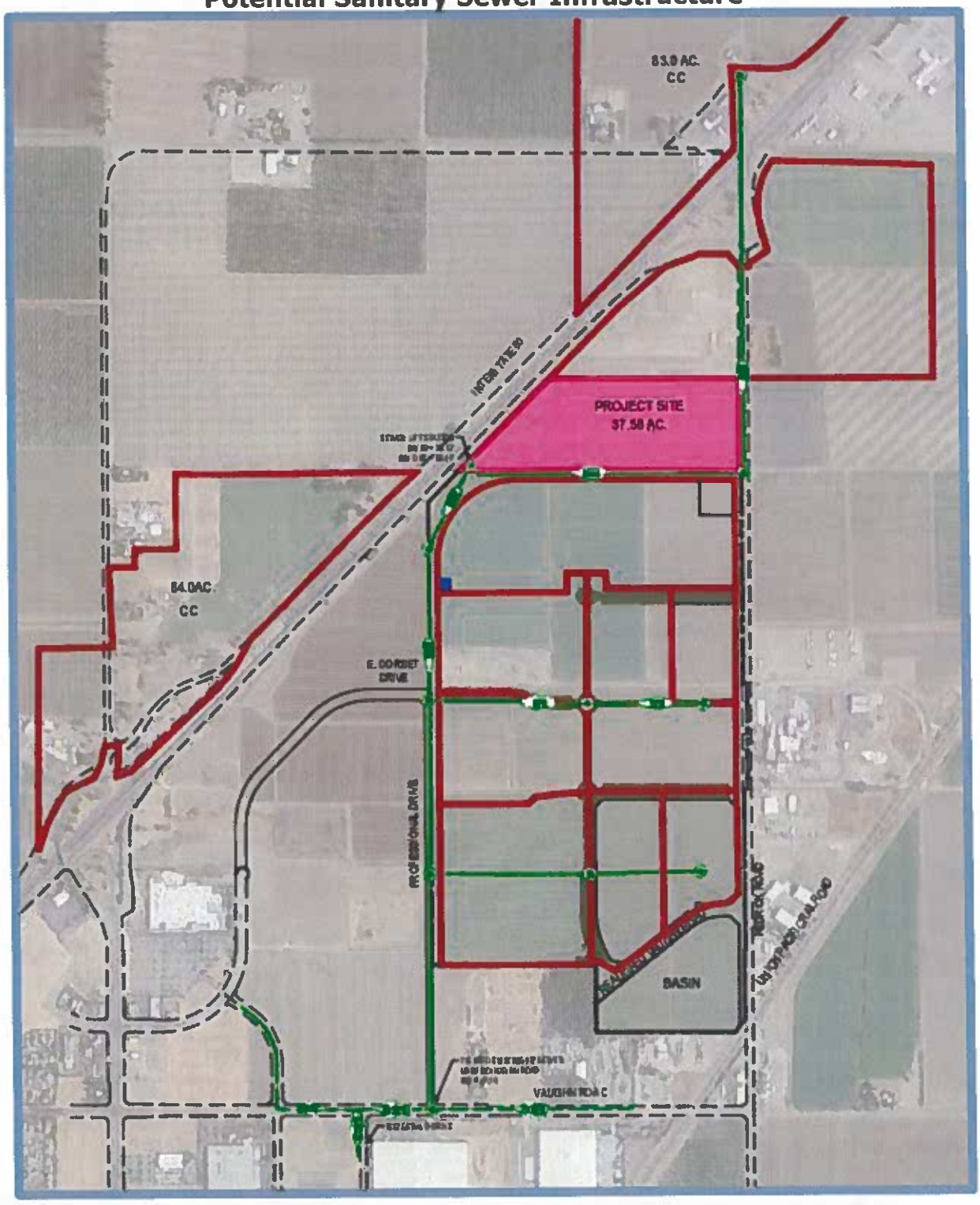
Figure 4
Potential Sanitary Sewer Infrastructure



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With respect to storm water drainage, if The Campus (Dixon 257) Project is approved prior to approval of the proposed project, and its storm water infrastructure is in place when the project applicant is ready to proceed with development, then the proposed project's on-site storm drain infrastructure would connect to the off-site retention basin constructed as part of The Campus (Dixon 257) Project. However, if The Campus (Dixon 257) Project is not approved or said project is approved but its associated storm water infrastructure will not be installed in sufficient time for the proposed project to proceed, future buildout of the currently proposed project would include the construction of an on-site retention basin located in the western portion of the project site. The retention basin would provide a minimum of 44.3 acre-feet of storage with a percolation rate of two inches per day.

Requested Entitlements

The proposed project would require approval of the proposed SPA to create the General Industrial land use designation and to redesignate the site's existing NQSP land use designation from Highway Commercial to General Industrial.

D. BASELINE FOR THE ANALYSIS

In cases where an approved project has already undergone environmental review, and the environmental document has been certified by the lead agency, the lead agency can restrict its review to the incremental effects of the modified project, rather than having to reconsider the overall impacts of the project as if it were proposed for the first time. In other words, if the project under review constitutes a modification of a previously approved project previously subjected to environmental review, then the "baseline" for purposes of CEQA is adjusted such that the originally approved project is assumed to exist.[2] Thus, the environmental baseline for this analysis consists of the maximum buildout potential of the project site under the site's existing Highway Commercial NQSP land use designation. Under the Highway Commercial NQSP land use designation, which allows for a maximum FAR of 0.25, the project site would be developed with a maximum of 376,685 sf of commercial uses.[3]

E. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

On the basis of the following Initial Study/Addendum, the City has determined that the proposed park project is consistent with the NQSP EIR. All project impacts have been determined to be less than significant, or can be mitigated to a less-than-significant level given required compliance with mitigation measures specified by the NQSP EIR. Therefore, none of the environmental factors below are affected.

☐ **Aesthetics**	☐ **Agriculture and Forest Resources**	☐ **Air Quality**
☐ **Biological Resources**	☐ **Cultural Resources**	☐ **Energy**
☐ **Geology and Soils**	☐ **Greenhouse Gas Emissions**	☐ **Hazards and Hazardous Materials**
☐ **Hydrology and Water Quality**	☐ **Land Use and Planning**	☐ **Mineral Resources**

2 See Michael H. Remy et al. *Guide to CEQA, 11th Edition*. Point Arena: Solano Press Books (2007), p. 207; Stephen L. Kostka and Michael H. Zischke. *Practice Under the Environmental Quality Act, Second Edition* (Vol. 1). Oakland: Continuing Education of the Bar (2018), p. 12-32; *Benton v. Board of Supervisors* (1st Dist. 1991) 226 Cal. App. 3d 1467.

3 34.59 * 43,560 sf *0.25 = 376,685 sf. Note that the site acreage used here to calculate the development potential of the site pursuant to the existing NQSP land use designation of Highway Commercial is based on an earlier version of the applicant's SPA exhibit. This former exhibit originally proposed to redesignate 34.59 acres as General Industrial and the remaining acreage for utilities. Rather, the entire 37.57 acres would be redesignated to General Industrial. By using the smaller acreage of 34.59, the development potential serving as the baseline for this analysis (376,685 sf) is less than it otherwise could be (409,137 sf). Thus, the analysis in this Addendum is conservative.

- ☐ **Aesthetics**
- ☐ **Noise**
- ☐ **Recreation**
- ☐ **Utilities and Service Systems**
- ☐ **Agriculture and Forest Resources**
- ☐ **Population and Housing**
- ☐ **Transportation**
- ☐ **Wildfire**
- ☐ **Air Quality**
- ☐ **Public Services**
- ☐ **Tribal Cultural Resources**
- ☐ **Mandatory Findings of Significance**

F. SOURCES

The following documents are referenced information sources used for the purpose of this Initial Study/Addendum:

1. Brusca Associates, Inc. *Pedrick Road at I80 Property Phase I ESA*. March 17, 2022.
2. Brusca Associates, Inc. *Pedrick Road Property Phase I ESA*. September 30, 2020.
3. California Department of Conservation. *California Important Farmland Finder*. Available at: https://maps.conservation.ca.gov/dlrp/ciff/. Accessed October 2024.
4. California Department of Forestry and Fire Protection. *Solano County: Fire Hazard Severity Zones In SRA*. Available at: https://cdnverify.osfm.fire.ca.gov/media/5wwjs5hp/fhsz_county_sra_11x17_2022_solano_ada.pdf. Accessed October 2024.
5. California Department of Transportation. *California State Scenic Highway System Map*. Available at: https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa. Accessed June 2022.
6. California State Water Resources Control Board. *Phase II Small Municipal Separate Storm Sewer System (MS4) Program*. Available at: https://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.html. Accessed October 2024.
7. Dixon Unified School District Board of Education. *Developer Fee Justification Study, 2022*. June 2022.
8. DKS Associates. *Dixon Innovation Center VMT Assessment Draft R.2*. October 22, 2024.
9. ENGEO Incorporated. *Pedrick Road Warehouse, Dixon, California Geotechnical Exploration*. June 21, 2022.
10. Federal Emergency Management Agency. *Flood Insurance Rate Map 06095C0200F, Effective August 2, 2012*. Available at: https://msc.fema.gov/portal/search?AddressQuery=Dixon%2C%20CA. Accessed October 2024.
11. HELIX Environmental Planning, Inc. *Dixon 257 Development Project Cultural Resources Assessment*. April 2023.
12. HELIX Environmental Planning, Inc. *Dixon 257 Project Biological Resources Assessment*. April 2023.
13. Madrone Ecological Consulting. *Biological Resources Assessment: Dixon Innovation Center (Pedrick Road)*. November 2023.
14. Morton & Pitalo, Inc. *Supplemental Sewer Capacity Analysis*. February 2024.
15. Morton & Pitalo, Inc. *Supplemental Water Capacity Analysis*. February 2024.
16. Morton & Pitalo. *Dixon Innovation Center Drainage Study*. February 28, 2024.
17. Placer County Air Pollution Control District. *2017 CEQA Handbook: Chapter 4, Analyzing Operations Criteria Pollutant Emissions*. 2017.
18. Sacramento Metropolitan Air Quality Management District. *CEQA Guide: Chapter 4, Operational Criteria Air Pollutant Emissions*. October 2020.
19. Solano Subbasin Groundwater Sustainability Agency. *Solano Subbasin Groundwater Sustainability Plan*. November 30, 2021.

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Attachment 1-Exhibit A

20. Tom Origer and Associates. *Cultural Resources Study for the Dixon Innovation Center Project, Dixon, Solano County, California.* September 13, 2023.
21. Weather Spark. *Climate and Average Weather Year Round in Dixon, California.* Available at: https://weatherspark.com/y/1121/Average-Weather-in-Dixon-California-United-States-Year-Round. Accessed November 2024.
22. Yolo-Solano Air Quality Management District. *Handbook for Assessing and Mitigating Air Quality Impacts.* July 11, 2007.

G. DETERMINATION

On the basis of this Initial Study/Addendum:

☐ I find that the Proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the Proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the applicant. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the Proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

× As demonstrated in this Initial Study Checklist, the City has determined that the proposed modified project does not present a legal or evidentiary basis for the preparation of a Supplemental or Subsequent EIR pursuant to State CEQA Guidelines Section 15162 and that an Addendum to the 1994 EIR, pursuant to State CEQA Guidelines Section 15164, is the appropriate environmental document for the proposed project.

_____ _____

Signature Date

Raffi Boloyan, Community Development Director City of Dixon

Printed Name For

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DATE: JAN 07 2025

H. ENVIRONMENTAL CHECKLIST

The purpose of the comparison is to evaluate the categories in terms of any "**changes**" or "**new information**" that may result in a changed environmental impact evaluation. A "no" answer does not necessarily mean that potential impacts do not exist relative to the environmental category, but that a relevant change would not occur in the condition or status of the impact due to its insignificance or its treatment in a previous environmental document. The following impact evaluation categories will be used to evaluate the proposed park project as compared to the NQSP EIR:

Where Impact Was Analyzed in the Previous CEQA Documents: This column provides a reference to the page(s) of the NQSP EIR where information and analysis may be found relative to the environmental issue listed under each topic.

Do Proposed Changes Involve New or More Severe Impacts? Pursuant to Section 15162(a)(1) of the CEQA Guidelines, this column indicates whether the changes represented by the current project will result in new significant impacts that have not already been considered and mitigated by a previous EIR or that substantially increase the severity of a previously identified significant impact. If a "yes" answer is given and more severe significant impacts are specified, additional mitigations will be specified in the discussion section including a statement of impact status after mitigation.

Any New Circumstances Involving New or More Severe Impacts? Pursuant to Section 15162(a)(2) of the CEQA Guidelines, this column indicates whether there have been changes to the project site or the vicinity (environmental setting) that have occurred subsequent to the certification of an EIR, which would result in the current project having significant impacts that were not considered or mitigated by that EIR or which substantially increase the severity of a previously identified significant impact.

Any New Information Requiring New Analysis or Verification? Pursuant to Section 15162(a)(3)(A-D) of the CEQA Guidelines, this column indicates whether new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the previous environmental documents were certified as complete is available, requiring an update to the analysis of the previous environmental documents to verify that the environmental conclusions and mitigation measures remain valid. If the new information shows that: (A) the project will have one or more significant effects not discussed in the prior environmental documents; or (B) that significant effects previously examined will be substantially more severe than shown in the prior environmental documents; or (C) that mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects or the project, but the project proponents decline to adopt the mitigation measure or alternative; or (D) that mitigation measures or alternatives which are considerably different from those analyzed in the prior environmental documents would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative, the question would be answered 'Yes' requiring the preparation of a subsequent EIR or supplement to the EIR. However, if the additional analysis completed as part of this Environmental Checklist Review finds that the conclusions of the prior environmental documents remain the same and no new significant impacts are identified, or identified significant environmental impacts are not found to be substantially more severe, the question would be answered 'No' and no additional EIR documentation (supplement to the EIR or subsequent EIR) would be required.

I. AESTHETICS. *Would the project:*	Where Impact Was Analyzed in Previous CEQA Document(s)?	Do Proposed Changes Involve New or More Severe Impacts?	Any New Circumstances Involving New or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
a. Have a substantial adverse effect on a scenic vista?	Pgs. 4-135 to 4-136 of NQSP EIR	No	No	No
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?	N/A	No	No	No
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	Pg. 4-136 of NQSP EIR	No	No	No
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Pgs. 4-136 to 4-137 of NQSP EIR	No	No	No

Discussion

a. Although the NQSP EIR does not specifically identify any scenic vistas or address potential impacts to such resources, the NQSP EIR concluded that although buildout of the NQSP would result in the elimination of existing views of agricultural uses, because the NQSP area is surrounded by agricultural uses, the loss of such views would not be considered significant.

The proposed project would not alter the assessment made in the NQSP EIR because although the proposed SPA would change the site's NQSP land use designation from CH to IG, both the anticipated and proposed uses are urban in nature. As such, the proposed project would not result in the development of any lands that were not previously analyzed for urban uses. Therefore, the proposed project would not result in substantial modifications such that the proposed project would have a substantial adverse effect on a scenic vista.

Based on the above information, the currently proposed project would not result in new significant impacts or substantially more severe significant impacts related to scenic vistas than were previously analyzed in the NQSP EIR. Therefore, the proposed project would be consistent with the conclusions of the NQSP EIR.

b. The NQSP EIR did not address potential impacts related to substantially damaging scenic resources, including, but not limited to rock outcroppings, and historic buildings within a State scenic highway. However, according to the California Department of

Transportation's (Caltrans) Scenic Highway System Lists,[4] the nearest officially designated State scenic highway to the project site is State Route (SR) 160, the nearest point of which is located approximately 16 miles to the east. In addition, while SR 128 is considered to be eligible for designation as a State scenic highway, SR 128 is located approximately eight miles west of the project site. As such, the currently proposed project would not substantially damage scenic resources, including, but not limited to rock outcroppings, and historic buildings within a State scenic highway. Thus, the proposed project would not result in new significant impacts or substantially more severe significant impacts than were previously analyzed in the NQSP EIR.

c. The NQSP EIR determined that compliance with the siting and design requirements and review procedures established in the NQSP to ensure visual compatibility and aesthetic appropriateness of development within the NQSP area would ensure that impacts related to substantially degrading the existing visual character or quality of the site and its surroundings would be less than significant. While the proposed project would change the types of uses proposed, and such changes could lead to changes in visual character that might ultimately be different, the resulting impacts would be not more severe than what was previously anticipated. In addition, the NQSP includes recommended design element features along the I-80 Corridor to soften the visual image of projects, with recommended setbacks varying from 35 to 200 feet. No specific design-level plans are being processed at this time for the project; thus, the City will review future development applications to ensure consistency with the I-80 Corridor recommendations in the NQSP. Should the project include construction of a retention basin on-site, rather than tying into the off-site basin within The Campus (Dixon 257) project, the basin would be located along the western property edge, adjacent to I-80. This retention basin could serve as part of the recommended buffer, as the NQSP clearly anticipates a variety of features that could achieve the recommended setback, including but not limited to, earth mounding, berms, retaining walls, screen structures, and parking areas. Therefore, the currently proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the NQSP EIR. Thus, the proposed project is consistent with the conclusions of the NQSP EIR.

d. The NQSP EIR analyzed the potential of buildout of the NQSP to create new sources of substantial light or glare which would adversely affect day or nighttime views in the area. The EIR concluded that while the NQSP includes a set of lighting guidelines intended to provide safety and security as well as mitigate nighttime glare, implementation of Mitigation Measures VR-A through VR-D would be required to reduce the impact to a less-than-significant level.

The currently proposed project would involve the introduction of new sources of light and glare associated with interior light spilling through windows, exterior lighting on the proposed structures, outdoor lighting on the internal drive aisles and within parking areas, and light reflected off windows. However, since the NQSP EIR was certified, lighting technology has improved considerably including LED components, lower spillover, and programmable levels. As such, the proposed lighting is anticipated to have a lesser impact than what was previously anticipated in the NQSP EIR. In addition, the proposed project would be subject to the 2022 Building Energy Efficiency Standards (Title 24, Part 6 California Code of Regulations [CCR]), which regulates outdoor lighting characteristics of

[4] California Department of Transportation. *California State Scenic Highway System Map*. Available at: https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa. Accessed June 2022.

new development such as maximum power and brightness, shielding, and controls to turn lighting on and off.

In addition, Mitigation Measures VR-A through VR-D would still be applicable to the proposed project. Mitigation Measure VR-A would require that bare metallic surfaces such as pipes, vents, and gutters be painted or concealed from view, and that all flashing and sheet metal be treated to match adjacent materials; similarly, Mitigation Measure VR-B would require that primary roofing materials be non-reflective. In addition, Mitigation Measure VR-C would disallow monolithic glass structures, and Mitigation Measure VR-D would require building mass colors to be of varied hues that minimize glare.

Based on the above, the currently proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the NQSP EIR. Therefore, the proposed project is consistent with the conclusions of the NQSP EIR.

Prior Mitigation Measures

The following mitigation measure(s) from the NQSP EIR would continue to apply to the proposed project:

- **Mitigation Measure VR-A:** Bare metallic surfaces such as pipes, vents, gutters, and flashings shall be painted or concealed from view in a manner harmonious to the structure. All flashing and sheet metal must be treated to match the adjacent materials.
- **Mitigation Measure VR-B:** Primary roofing materials shall be non-reflective.
- **Mitigation Measure VR-C:** Monolithic glass structures shall not be allowed unless used as a portion of a building to highlight an entry.
- **Mitigation Measure VR-D:** Building mass colors shall be of varied hues that minimize glare with bright colors limited to use around doors, trims, awnings, and other pedestrian-oriented features.

New Mitigation Measures

None Required.

II. AGRICULTURE AND FORESTRY RESOURCES. *Would the project:*	Where Impact Was Analyzed in Previous CEQA Document(s)?	Do Proposed Changes Involve New or More Severe Impacts?	Any New Circumstances Involving New or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping Program of the California Resources Agency, to non-agricultural use?	Pg. 4-13	No	No	No
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	Pg. 4-18	No	No	No
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))?	N/A	No	No	No
d. Result in the loss of forest land or conversion of forest land to non-forest use?	N/A	No	No	No
e. Involve other changes in the existing environment which, due to their location or nature, could individually or cumulatively result in loss of Farmland to non-agricultural use?	Pg. 4-14	No	No	No

Discussion

a,b,e. The NQSP EIR determined that although development of the NQSP area with commercial and industrial uses would be consistent with the Dixon General Plan, such development would result in the conversion of approximately 623 acres of Farmland, including approximately 60 acres under a Williamson Act contract. The NQSP EIR concluded that mitigation to reduce the significance of such impacts would be infeasible, and would remain significant and unavoidable.

With respect to the currently proposed project, according to the California Department of Conservation's California Important Farmland Finder tool, the project site is solely comprised of Grazing Land.[5] In addition, the project site is not subject to a Williamson Act contract. Therefore, the proposed project would have no impact related to the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, to a non-agricultural use and further review is not required for this topic.

Based on the above, the currently proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously

[5] California Department of Conservation. *California Important Farmland Finder*. Available at: https://maps.conservation.ca.gov/dlrp/ciff/. Accessed October 2024.

analyzed in the NQSP EIR. Thus, the proposed project is consistent with the conclusions of the NQSP EIR.

c,d. Impacts to forest land, timberland, or land zoned Timberland Production were not addressed in the NQSP EIR. Nonetheless, the project site consists of disked grasses. The City of Dixon General Plan designates the project site as Industrial and the site is zoned IG-NESP. The NQSP designates the site as CH. The project site is not considered forest land (as defined in PRC Section 12220[g]), timberland (as defined by PRC Section 4526), and is not zoned Timberland Production (as defined by Government Code Section 51104[g]). Therefore, the proposed project would have no impact with regard to conversion of forest land or any potential conflict with forest land, timberland, or Timberland Production zoning.

Prior Mitigation Measures
None Required.

New Mitigation Measures
None Required.

III. AIR QUALITY. *Would the project:*	Where Impact Was Analyzed in Previous CEQA Document(s)?	Do Proposed Changes Involve New or More Severe Impacts?	Any New Circumstances Involving New or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
a. Conflict with or obstruct implementation of the applicable air quality plan?	Pgs. 4-45 to 4-47	No	No	No
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	Pgs. 4-47 to 4-50	No	No	No
c. Expose sensitive receptors to substantial pollutant concentrations?	Pg. 4-50	No	No	No
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	N/A	No	No	No

Discussion

a,b. The NQSP EIR determined that construction of the NQSP area could result in emissions that could conflict with or obstruct implementation of the applicable air quality plan. However, with implementation of mitigation, such impacts would be reduced to a less-than-significant level. However, the NQSP EIR determined that a significant and unavoidable impact would occur resulting from increased long-term regional emissions of criteria pollutants, primarily associated with mobile sources, that would exceed the Yolo-Solano Air Quality Management District's (YSAQMD) significance thresholds of 10 tons per year (TPY) for reactive organic gas (ROG), 10 TPY for nitrogen oxides (NO_X), and 80 pounds per day for particulate matter 10 microns in diameter (PM_{10}). The NQSP EIR also concluded that even with implementation of mitigation, the generation of local mobile-source carbon monoxide (CO) concentrations would result in a significant and unavoidable impact.

For this Addendum, air quality impacts were assessed to determine if the proposed project could involve more severe air quality impacts than those that were analyzed in the previous CEQA document for the planned Highway Commercial uses.

Regulatory Setting

Areas not meeting federal and State AAQS are designated as nonattainment areas, which are required to have an air quality plan containing strategies and control measures to attain the AAQS. The NQSP area, including the project site, is located within the Sacramento Valley Air Basin (SVAB) and is within the jurisdictional boundaries of the YSAQMD. The SVAB is designated nonattainment for the federal particulate matter 2.5 microns in diameter ($PM_{2.5}$) and PM_{10} standards, as well as for both the federal and State ozone standards.

Due to the nonattainment designations of the area, YSAQMD has developed plans to attain the State and federal standards for ozone and particulate matter. The plans include the 2013 Ozone Attainment Plan, the $PM_{2.5}$ Implementation/Maintenance Plan, and the 2012 Triennial Assessment and Plan Update. Adopted YSAQMD rules and regulations, as well as the thresholds of significance, have been developed with the intent to ensure continued attainment of AAQS, or to work towards attainment of AAQS for which the area is currently designated nonattainment, consistent with applicable air quality plans. Thus,

by exceeding the YSAQMD's mass emission thresholds for operational or construction emissions of ROG, NO_X, or PM_{10}, a project would be considered to conflict with or obstruct implementation of the YSAQMD's air quality planning efforts. The YSAQMD mass emission thresholds for operational and construction emissions are shown in Table 1 below.

Table 1
YSAQMD Thresholds of Significance

Pollutant	Construction Thresholds	Operational Thresholds
ROG	10 tons/yr	10 tons/yr
NO_X	10 tons/yr	10 tons/yr
PM_{10}	80 lbs/day	80 lbs/day

Source: YSAQMD. Handbook for Assessing and Mitigating Air Quality Impacts. July 11, 2007.

Method of Analysis

To analyze emissions from construction and operations of the proposed uses, emissions were quantified using the California Emissions Estimator Model (CalEEMod) software version 2022.1.1.28 – a Statewide model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify air quality emissions, including GHG emissions, from land use projects. The model applies inherent default values for various land uses, including construction data, vehicle mix, trip length, average speed, etc. Where project-specific information is available, such information should be applied in the model. It should be noted that the modeling for both the approved and proposed land uses included the potential off-site utilities infrastructure improvements, as they would be needed to serve the site under either scenario. All CalEEMod results are included as Appendix A.

Pursuant to the site's existing NQSP land use designation, buildout of the project site was originally anticipated to include Highway Commercial uses. For the purpose of the CalEEMod modeling, the approved land use for the 37.57-acre site was assumed to result in the development of 376,685 sf of Highway Commercial uses. The modeling prepared for the approved conditions scenario assumed the foregoing land uses, as well as the following:

- Construction was assumed to start in June 2025;
- Construction would occur over a four-year period; and
- Trip rates were adjusted based on the trip generation rates that were provided for the proposed project by DKS Associates.[6]

For the proposed project, it was assumed that buildout of the project site could result in approximately 563,826 sf of General Industrial uses. The emissions modeling included the following assumptions:

- Construction was assumed to start in June 2025;
- Construction would occur over a four-year period; and
- Trip rates were adjusted based on the trip generation rates that were provided for

6 DKS Associates. *Dixon Innovation Center VMT Assessment Draft R.2*. October 22, 2024.

the proposed project by DKS Associates.[7]

The estimated emissions associated with construction and operations of the proposed project as compared to the approved conditions are presented and discussed in further detail below.

Construction Emissions

According to the CalEEMod results, the approved conditions and the proposed project would result in maximum criteria air pollutant emissions during construction as shown in Table 2.

Table 2
Incremental Change in Construction Emissions

	ROG (tons/yr)	NO_x (tons/yr)	PM_{10} (lbs/day)
Approved Conditions	0.63	1.81	21.7
Proposed Project	0.74	0.49	20.2
Difference	0.11	-1.32	-1.5
Threshold of Significance	10	10	80
Exceeds Threshold?	**NO**	**NO**	**NO**

Source: CalEEMod, October 2024 (see Appendix A).

As shown in Table 2, the proposed project could result in slightly reduced emissions as compared to the approved conditions, with the exception of ROG emissions; however, construction emissions associated with the proposed project would be well below the applicable thresholds of significance for all criteria pollutants. Most importantly, the net increase in criteria pollutant emissions associated with the proposed project as compared to the existing conditions would be well below all applicable thresholds of significance. As a result, the proposed project would result in a less-than-significant impact related to construction emissions of criteria pollutants.

Operational Emissions

According to the CalEEMod results, the approved conditions and the proposed project would result in maximum criteria air pollutant emissions during operations as shown in Table 3.

As shown in the table, operational emissions associated with the proposed project would be above the applicable threshold of significance for PM_{10}. However, emissions of ROG and NO_x associated with the proposed project would be below the thresholds of significance. However, as previously discussed, under subsequent CEQA review, the analysis appropriately considers the approved conditions as the environmental baseline for determining impact significance. Although newly calculated proposed project PM_{10} emissions would exceed the 82 lbs/day YSAQMD threshold of significance, emissions of PM_{10} would occur at a level below what could be anticipated for the approved conditions in the 1994 EIR. Because the proposed project's emission of PM_{10} would be less than that of the 1994 EIR, new mitigation measures are not required beyond those identified in the 1994 EIR, which would result in PM_{10} emissions below the 82 lbs/day YSAQMD threshold of significance.

7 DKS Associates. *Dixon Innovation Center VMT Assessment Draft R.2.* October 22, 2024.

Table 3 Incremental Change in Operational Emissions			
	ROG (tons/yr)	NO_X (tons/yr)	PM_{10} (lbs/day)
Approved Conditions	10.5	9.56	99.2
Proposed Project	8.48	8.66	85.9
Difference	-2.02	-0.9	-13.3
Threshold of Significance	10	10	80
Exceeds Threshold?	**NO**	**NO**	**NO**
Source: CalEEMod, October 2024 (see Appendix A).			

Conclusion

Given all of the above, the proposed project would not result in any new significant impacts or a substantial increase in the severity of a previously identified significant impact related to air quality. Although the proposed project would result in emissions of PM_{10} that exceed the YSAQMD threshold, emissions of PM_{10} would be below what was anticipated for the previously approved uses.

Considering the anticipated level of PM_{10} emissions, mitigation sufficient to reduce PM_{10} emissions below the YSAQMD's threshold of significance is currently available. Overall, the proposed project would not result in new significant impacts or substantially more severe significant impacts related to conflicting with or obstruct implementation of the applicable air quality plan.

c. The NQSP EIR found that even with implementation of Mitigation Measures AQ-M through AQ-V, buildout of the NQSP area would result in a significant and unavoidable impact related to the exposure of sensitive receptors to substantial pollutant concentrations.

Some land uses are considered more sensitive to air pollution than others, due to the types of population groups or activities involved. Heightened sensitivity may be caused by preexisting health problems, proximity to the emissions source, and/or duration of exposure to air pollutants. Children, pregnant women, the elderly, and those with existing health problems are especially vulnerable to the effects of air pollution. Accordingly, land uses that are typically considered to be sensitive receptors include residences, schools, childcare centers, playgrounds, retirement homes, convalescent homes, hospitals, and medical clinics. The nearest existing sensitive receptors to the project site are the single-family residences located approximately 1,000 feet west of the project site, across I-80.

The major pollutant concentrations of concern are localized CO emissions and Toxic Air Contaminant (TAC) emissions, which are addressed in further detail below.

Localized CO Emissions

Localized concentrations of CO are related to the levels of traffic and congestion along streets and at intersections. High levels of localized CO concentrations are only expected where background levels are high, and traffic volumes and congestion levels are high. The YSAQMD recommends the use of screening thresholds to assess a project's potential to create an impact through the creation of CO hotspots. A violation of the CO standard could

occur if either of the following criteria is true of any street or intersection affected by the mitigated project:[8]

- The project would reduce peak-hour level of service (LOS) on one or more streets or at one or more intersections to an unacceptable LOS (typically LOS E or F); or
- The project would increase a traffic delay by 10 or more seconds on one or more streets or at one or more intersections in the project vicinity where a peak hour LOS of F currently exists.

If either or both of the above criteria are met by the mitigated project, YSAQMD recommends performing a full CO Protocol Analysis. However, following approval of Senate Bill (SB) 743, CEQA documents can no longer rely on LOS for determining significance conclusions. Because the YSAQMD's current guidance for determining localized CO impacts relies only on LOS, and LOS cannot be used for determining significance conclusions, this analysis relies on the guidance of nearby air districts.

Pursuant to the Sacramento Metropolitan Air Quality Management District's (SMAQMD's) CEQA Guidelines, emissions of CO are generally of less concern than other criteria pollutants, as operational activities are not likely to generate substantial quantities of CO, and the SVAB has been in attainment for CO for multiple years.[9] Additionally, the Placer County Air Pollution Control District (PCAPCD), which has authority over a portion of the SVAB and is located within proximity to the YSAQMD, has a screening level for localized CO impacts. According to the PCAPCD screening levels, a project could result in a significant impact if the project would result in CO emissions from vehicle operations in excess of 550 lbs/day.[10] Per CalEEMod estimates calculated for the proposed project, operations of the proposed project would result in maximum CO emissions of 375 lbs/day, which is well under the PCAPCD screening level.

Therefore, based on the guidance of the SMAQMD and PCAPCD, the proposed project would not expose sensitive receptors to substantial concentrations of localized CO and impacts related to localized CO emissions would be less than significant.

TAC Emissions

Another category of environmental concern is TACs. The California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective* (Handbook) provides recommended setback distances for sensitive land uses from major sources of TACs, including, but not limited to, freeways and high traffic roads, distribution centers, and rail yards. The CARB has identified diesel particulate matter (DPM) from diesel-fueled engines as a TAC; thus, high volume freeways, stationary diesel engines, and facilities attracting heavy and constant diesel vehicle traffic are identified as having the highest associated health risks from DPM. Such TACs include, but are not limited to, benzene, ethyl benzene, toluene, and xylene. Health risks associated with TACs are a function of both the concentration of emissions and the duration of exposure, where the

8 Yolo-Solano Air Quality Management District. *Handbook for Assessing and Mitigating Air Quality Impacts*. July 11, 2007.

9 Sacramento Metropolitan Air Quality Management District. *CEQA Guide: Chapter 4, Operational Criteria Air Pollutant Emissions*. October 2020.

10 Placer County Air Pollution Control District. *2017 CEQA Handbook: Chapter 4, Analyzing Operations Criteria Pollutant Emissions*. 2017.

higher the concentration and/or the longer the period of time that a sensitive receptor is exposed to pollutant concentrations would correlate to a higher health risk.

The proposed project would involve components that would result in emissions of TACs. In particular, implementation of the proposed project would result in emissions related to project construction, and the use of heavy-duty diesel trucks to transport goods to and from the site. Each source of TACs is discussed in further depth below.

Construction Emissions

Construction-related activities have the potential to generate concentrations of TACs, specifically DPM, from on-road haul trucks and off-road equipment exhaust emissions. However, construction would be temporary and would occur over a relatively short duration in comparison to the operational lifetime of the proposed project. Only portions of the site would be disturbed at a time throughout the construction period, with operation of construction equipment occurring intermittently throughout the course of a day rather than continuously at any one location on the project site. Operation of construction equipment within portions of the overall development area would allow for the dispersal of emissions, and would ensure that construction activity is not continuously occurring in the portions of the project site closest to existing receptors.

Pursuant to the City's Noise Ordinance, construction activities would be limited to the hours of 7:00 AM and 6:00 PM Monday through Saturday and 9:00 AM through 6:00 PM Sunday. In addition, all construction equipment and operation thereof would be regulated per the In-Use Off-Road Diesel Vehicle Regulation. The In-Use Off-Road Diesel Vehicle Regulation includes emissions reducing requirements such as limitations on vehicle idling, disclosure, reporting, and labeling requirements for existing vehicles, as well as standards relating to fleet average emissions and the use of Best Available Control Technologies. Furthermore, the prevailing wind direction in the City of Dixon is primarily from the west and, thus, construction-related DPM would be directed away from the nearest residential areas and associated sensitive receptors.[11]

Due to the temporary nature of construction and substantial distance to the closest sensitive receptors, the project would not result in any one nearby sensitive receptor being exposed to high concentration of DPM associated with construction for an extended period of time.

Operational Emissions

The CARB Handbook considers industrial uses involving heavy-duty diesel truck traffic as a source of substantial TAC emissions. The proposed project could consist of the future development of approximately 563,826 sf of industrial uses, which would involve the use of heavy-duty diesel trucks during project operations. However, the nearest sensitive receptor to the project site is a single-family residence located approximately 1,000 feet west of the project site. DPM is a highly dispersive gas, and concentrations of DPM decline rapidly with distance. Based on the CARB's Handbook, an 80 percent drop-off in pollutant concentrations occurs at approximately 1,000 feet from a distribution center. In addition, the prevailing wind direction in the project area is from the west; therefore, any emissions of TACs produced by the proposed project would not typically

[11] Weather Spark. *Climate and Average Weather Year Round in Dixon, California*. Available at: https://weatherspark.com/y/1121/Average-Weather-in-Dixon-California-United-States-Year-Round. Accessed November 2024.

be blown toward the nearest sensitive receptors, which are located to the west of the project site.[12] Therefore, the proposed project would not expose sensitive receptors to substantial pollutant concentrations during operations.

Conclusion

Based on the above, the proposed project would not result in new significant impacts or substantially more severe significant impacts related to exposure to substantial pollutant concentrations than what were analyzed in the NQSP EIR. Therefore, the proposed project remains consistent with the conclusions of the NQSP EIR.

d. The NQSP EIR did not analyze the potential for buildout of the NQSP area to create objectionable odors affecting a substantial number of people. Pollutants of principal concern include emissions leading to odors, emissions of dust, or emissions considered to constitute air pollutants. Air pollutants have been discussed in sections "a" through "c" above. Therefore, the following discussion focuses on emissions of odors and dust.

Odors

According to the YSAQMD, common types of facilities that are known to produce odors include, but are not limited to, wastewater treatment facilities, chemical or fiberglass manufacturing, landfills, auto body shops, composting facilities, food processing facilities, refineries, dairies, and asphalt or rendering plants.[13] While offensive odors rarely inflict physical harm, the YSAQMD notes that odors can still generate considerable distress among the public because of their unpleasant nature, which in turn, potentially leads to citizen complaints to local governments and the YSAQMD. Manifestations of a person's reaction to odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache). The presence of an odor impact is dependent on a number of variables, including: the nature of the odor source; the frequency of odor generation; the insensitivity of odor; the distance of odor source to sensitive receptors; wind direction; and sensitivity of the receptor.

Diesel fumes from construction equipment are often found to be objectionable; however, construction is temporary and construction equipment would operate intermittently throughout the course of a day, would be restricted to daytime hours, and would only occur over portions of the improvement area at a time. In addition, all construction equipment and operation thereof would be regulated per the In-Use Off-Road Diesel Vehicle Regulation. Project construction would also be required to comply with all applicable YSAQMD rules and regulations, particularly associated with permitting of air pollutant sources. The aforementioned regulations would help to minimize air pollutant emissions as well as any associated odors related to operation of construction equipment. Considering the short-term nature of construction activities, as well as the regulated and intermittent nature of the operation of construction equipment, construction of the proposed project would not be expected to create objectionable odors affecting a substantial number of people.

The YSAQMD regulates objectionable odors through Rule 2.5 (Nuisance), which prohibits any person or source from emitting air contaminants or other material that result in any of

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12 *Ibid.*

13 Yolo-Solano Air Quality Management District. *Handbook for Assessing and Mitigating Air Quality Impacts*. July 11, 2007.

the following: cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public; endanger the comfort, repose, health, or safety of any such persons or the public; or have a natural tendency to cause injury or damage to business or property. Rule 2.5 is enforced based on complaints. If complaints are received, the YSAQMD is required to investigate the complaint, as well as determine and ensure a solution for the source of the complaint, which could include operational modifications. Thus, although not anticipated, if odor complaints are made during construction or operation of the project, the YSAQMD would ensure that such odors are satisfactorily addressed. Furthermore, the approved Highway Commercial uses could result in greater potential to generate odors than the proposed General Industrial uses. Highway Commercial uses such as fast-food restaurants generate food odors from cooking, oil and grease waste, and refuse that could reasonably be expected to exceed any odors that could be generated from the proposed uses.

Dust

All projects within the YSAQMD are required to implement construction mitigation measures, such as a dust control program. The dust control program would ensure that water or dust palliatives would be applied to exposed surfaces, grading operations would not take place during periods of high winds, and construction-related trucks would be covered at the end of the day. In addition, the project would be required to comply with YSAQMD Rule 2.11, Particulate Matter Concentration, and Rule 2.19, Particulate Matter Process Emission Rate, as well as the best management practices (BMPs) noted in Policy NE-5.3 of the City's General Plan, which serve to reduce air pollutant emissions associated with the construction and operation of development projects.

Implementation of all applicable YSAQMD rules would ensure that construction of the proposed project would not result in substantial emissions of dust. Following project construction, vehicles operating within the project site would be limited to paved areas of the site. Thus, project operations would not include sources of dust that could adversely affect a substantial number of people.

Conclusion

Based on the above, the proposed project would not result in new significant impacts or substantially more severe significant impacts related to exposure to substantial pollutant concentrations than what were analyzed in the NQSP EIR. Therefore, the proposed project remains consistent with the conclusions of the NQSP EIR.

Prior Mitigation Measures

The following mitigation measures from the NQSP are still applicable to the proposed project to address the exceedance of the YSAQMD PM_{10} threshold.

- **Mitigation Measure AQ-M**: Convenient access, such as shuttle services, to public transit systems shall be provided to encourage shoppers, employees and visitors to use mass transit, thereby reducing vehicle emissions.
- **Mitigation Measure AQ-N:** Information shall be provided at various locations within the project site about carpool, vanpool, or transit use facilities. Incentives, such as parking stalls for carpool and vanpool vehicles shall also be exercised.
- **Mitigation Measure AQ-O**: Employee trip reduction and other applicable transportation control measures shall be developed. An annual report shall be prepared to document and demonstrate employee trip reduction.

- **Mitigation Measure AQ-R**: Parking lots, drive-through facilities, and egress/ingress areas shall be designed to reduce vehicle idling. Slow-moving or idling vehicles produce more emissions.
- **Mitigation Measure AQ-S**: Secure, convenient indoor or outdoor bike storage racks shall be provided at commercial centers, office buildings, and other places of employment.

New Mitigation Measures

None Required.

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IV. BIOLOGICAL RESOURCES. *Would the project:*	Where Impact Was Analyzed in Previous CEQA Document(s)?	Do Proposed Changes Involve New or More Severe Impacts?	Any New Circumstances Involving New or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Pgs. 4-58 to 4-61	No	No	No
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	N/A	No	No	No
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	Pgs. 4-58 to 4-59	No	No	No
d. Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?	N/A	No	No	No
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	N/A	No	No	No
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan?	N/A	No	No	No

Discussion

a. The NQSP EIR analyzed the potential for buildout of the NQSP area to substantially impact a candidate, sensitive, or special-status plant or wildlife species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS). According to the NQSP EIR, special-status plant species were determined to be absent from the NQSP area and to not have the potential to occur within the NQSP. Therefore, the NQSP EIR did not further address potential impacts to special-status plant species. According to the Biological Resources Assessment (BRA) prepared for the project site by Madrone Ecological Consulting (Madrone) (see Appendix B),[14] the agricultural lands within the project site lack the

[14] Madrone Ecological Consulting. *Biological Resources Assessment: Dixon Innovation Center (Pedrick Road).* November 2023.

necessary habitat constituents to provide potential habitat for special-status plant species. Therefore, consistent with the NQSP EIR, future development of the project site would not result in any adverse impacts to special-status plant species.

Should The Campus (Dixon 257) Project not be approved, or said project is approved but its associated water and sewer infrastructure will not be installed in sufficient time for the proposed project to proceed, the proposed project be required to complete off-site water and sewer infrastructure improvements. However, according to BRA prepared for The Campus (Dixon 257) Project (Dixon 257 BRA),[15] special-status plant species do not have the potential to occur within the development footprint of such utilities infrastructure improvements, and special-status plant species were not observed. Therefore, the potential off-site utilities improvements that could be associated with the proposed project would not result in any adverse impacts to special-status plant species.

With respect to special-status wildlife species, the NQSP EIR identified three special-status wildlife species with the potential to occur within the NQSP area: California tiger salamander, Swainson's hawk, and burrowing owl. The NQSP EIR concluded that although buildout of the NQSP area could result in potential impacts to the foregoing special-status wildlife species, implementation of mitigation would ensure that such impacts would be reduced to a less-than-significant level.

The BRA determined that future development of the project site would not have the potential to impact aquatic species such as California tiger salamander. Similarly, The Campus (Dixon 257) BRA concluded that California tiger salamander does not have the potential to occur within the development footprint of the potential off-site utilities improvements. As such, the proposed project would not have the potential to result in adverse impacts to the California tiger salamander.

Similar to the determination of the NQSP EIR, the BRA prepared for the project site found that the only special-status wildlife species with the potential to occur within the project site are Swainson's hawk and burrowing owl, as well as other nesting raptors (e.g., white-tailed kite) and songbirds. Although development of the project site is not currently proposed, future development of the site could result in the destruction of habitat or individuals of the foregoing species. The potential off-site utilities improvements could result in similar impacts.

Impacts to nesting migratory birds would be addressed through the project's required compliance with Policy NE-1.13 of the Dixon General Plan, as follows:

- In new development, avoid disturbance to and loss of bird nests in active use by scheduling vegetation removal and new construction during the non-nesting season (typically September 1- February 15) or by conducting a pre-construction survey by a qualified biologist to confirm nests are absent or to define appropriate buffers until any young have successfully fledged the nest.

While General Plan policies provide guidance for protection of special-status species and migratory birds, additional performance standards should be provided to ensure clarity of mitigation requirements. New mitigation measures are provided below for this purpose, based on the recommendations in the BRA for the proposed project. In addition, while the

[15] HELIX Environmental Planning, Inc. *Dixon 257 Project Biological Resources Assessment*. April 2023.

NQSP includes broad mitigation requirements for protected wildlife, the City, as lead agency, recognizes the need to improve upon the measure language to provide additional clarity and greater ease of tracking successful implementation. Modified mitigation measures are provided below for this purpose.

Based on the above, given implementation of the modified and new mitigation measures defined below, the proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the NQSP EIR. Therefore, the proposed project would remain consistent with the conclusions of the NQSP EIR.

b. Riparian habitat, as well as other sensitive natural communities, have not been identified within the NQSP area. As such, the NQSP EIR did not address potential impacts related to potentially substantial adverse effects on any riparian habitat or other sensitive natural communities identified in local or regional plans, policies, regulations or by the CDFW or USFWS. The BRA prepared for the proposed project confirmed that riparian habitat and/or other sensitive natural communities do not occur within the project site, and The Campus (Dixon 257) BRA also confirmed that such resources do not occur within the footprint of the potential off-site utilities improvements.

Based on the above, the proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the NQSP EIR. Therefore, the proposed project would remain consistent with the conclusions of the NQSP EIR.

c. As shown in Figure 4.5.1, Biological Resources, of the NQSP EIR, the only aquatic resource identified within the NQSP area by the NQSP EIR is the approximately 5.3-acre seasonal freshwater marsh located in the western portion of the NQSP area (not on the project site). The NQSP EIR determined that implementation of Mitigation Measures B-A, B-B, and B-C, which generally require avoidance of the seasonal freshwater marsh and replacement mitigation at a 1:1 ratio of any of the wetland that is destroyed during construction, would reduce the impact to a less-than-significant level. The seasonal freshwater marsh is located southwest of the project site and west of the development footprint of the potential off-site utilities infrastructure improvements. Therefore, the proposed project would not result in any impacts to the seasonal freshwater marsh, and Mitigation Measures B-A, B-B, and B-C do not apply to the proposed project.

According to the protocol-level aquatic resources delineation conducted in 2022 as part of the BRA, the project site does not contain any aquatic resources. However, according to The Campus (Dixon 257) BRA, and the Draft Environmental Impact Report for The Campus Project (see Impact 3.4-7, pg. 3.4-40), a total of 1.17 acres of ditches were identified in The Campus (Dixon 257) Project site, a portion of which could be impacted by the potential off-site utilities improvements associated with the proposed project. Although the aquatic features have not been formally verified by the U.S. Army Corps of Engineers (USACE), they are likely to be classified as a water of the U.S. and/or water of the State. A preliminary jurisdictional determination (SPK-2021-00634) was issued May 11, 2023 by the USACE that states the 1.17 acres of ditches are considered potential jurisdictional aquatic resources ("waters of the United States") regulated under Section 404 of the Clean Water Act. Therefore, if The Campus (Dixon 257) Project is not approved, or said project is approved but its associated water and sewer infrastructure will not be installed in sufficient time for the proposed project to proceed, the proposed project would

be required to complete off-site utilities infrastructure improvements that could have a substantial adverse affect on state or federally protected wetlands through direct removal, filling, hydrological interruption, or other means. However, implementation of Mitigation Measure IV-4, as defined below, incorporated by reference from The Campus Project EIR (i.e., Mitigation Measure 3.4-7), would reduce the potential impact to a less-than-significant level.

Based on the above, the currently proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the NQSP EIR. As such, the proposed project would remain consistent with the conclusions of the NQSP EIR.

d. Wildlife corridors link areas of suitable wildlife habitat that are otherwise separated by rugged terrain, changes in vegetation, or human disturbance. This fragmentation of habitat can also occur when a portion of one or more habitats is converted into another habitat; for instance, when woodland or scrub habitat is altered or converted into grasslands after a disturbance such as fire, mudslide, or construction activities. Wildlife corridors mitigate the effects of this fragmentation by: (1) allowing animals to move between remaining habitats thereby permitting depleted populations to be replenished and promoting genetic exchange; (2) providing escape routes from fire, predators, and human disturbances, thus reducing the risk of catastrophic events (such as fire or disease) on population or local species extinction; and (3) serving as travel routes for individual animals as they move within their home ranges in search of food, water, mates, and other needs.

The NQSP EIR did not include any discussion of potential impacts related to interference with the movement of wildlife species or with established wildlife corridors. Furthermore, project site is located within an agricultural area that is surrounded by agricultural fields, industrial areas, and roadways. As such, although wildlife may disperse through the project site on a local level, neither the project-specific BRA nor The Campus (Dixon 257) BRA identified potential wildlife migration corridors within the project site or within the development footprint of the potential off-site utilities infrastructure improvements. Therefore, the proposed project would result in a less-than-significant impact to wildlife movement within the project area.

Based on the above, the currently proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the NQSP EIR. As such, the proposed project would remain consistent with the conclusions of the NQSP EIR.

e. The NQSP EIR did not include any discussion of potential impacts related to conflicting with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Neither the project site nor the development footprint of the potential off-site utilities infrastructure improvements contain any trees, and, thus, would not require any tree removal. As such, no impact would occur.

f. As discussed above, since certification of the NQSP EIR, the City of Dixon has participated in the Solano HCP which establishes a framework for complying with State and federal endangered species regulations while accommodating future urban growth, development of infrastructure, and ongoing operations and maintenance activities associated with flood control, irrigation facilities, and other public infrastructure undertaken by or under the permitting authority/control of the Plan Participants within Solano County over the next 30

years. As the HCP was being prepared when the NQSP was being considered, the EIR includes Mitigation Measure B-E, which requires the proposed project to participate in the HCP. Participation in the Solano HCP would include pre- construction surveys, and adherence to the requirements of the HCP. The HCP is still in draft form and not yet adopted, as the Environmental Impact Statement has not been completed. Compliance with Mitigation Measure B-E would ensure that the proposed project would not result in conflicts with an adopted HCP or other approved local, regional, or State habitat conservation plan.

Based on the above, the currently proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the NQSP EIR. As such, the proposed project would remain consistent with the conclusions of the NQSP EIR.

Prior Mitigation Measures

The following mitigation measure(s) from the NQSP EIR would apply to the proposed project, but only if the Solano Countywide Multispecies Habitat Conservation Plan (HCP) is adopted prior to issuance of grading permits for the proposed project:

- **Mitigation Measure B-E:** Future development shall participate in a County-wide Habitat Management Plan.

Modified Mitigation Measures

The following mitigation measure(s) from the NQSP EIR have been modified to apply to the proposed project:

- **Mitigation Measure B-D:** A breeding survey shall be conducted ~~between April and July~~ in accordance with guidelines set by the *Swainson's Hawk Technical Advisory Committee (SHTAC 2000)* in order to:
  - Determine if the species nest on the project site; and
  - To ~~develop appropriate mitigation~~ comply with the following generally accepted mitigation replacement ratio~~, which may include a 1:1 replacement ratio of~~ for impacted foraging habitat based on CDFW *Staff Report Regarding Mitigation for Impacts to Swainson's Hawk* (2014)~~. This replacement habitat should include alfalfa and row crops such as tomatoes, oats, wheat, barley, and sugar beets.~~:

    Pursuant to California Department of Fish and Wildlife (CDFW) guidelines, the applicant shall preserve an equal acreage of Swainson's hawk foraging habitat as is proposed for development (approximately 37.57 acres) (i.e., a 1:1 ratio). The preserved habitat shall be at a location approved by the CDFW. Preservation may occur through either:

    - Payment of a mitigation fee to an established mitigation bank, or similar habitat development and management company, or the City of Dixon through a negotiated agreement (subject to approval by CDFW) between the City and the applicant. The monies shall be held in a trust fund, and used to purchase mitigation credits to offset the loss of suitable foraging habitat for Swainson's hawk. The credits would become incorporated into the mitigation bank, owned and operated by the habitat development and

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management company, and protected in perpetuity (consistent with CDFW guidelines); or

- Purchase of conservation easements or fee title of lands with suitable Swainson's hawk foraging habitat (consistent with CDFW guidelines).

If mitigation lands or a conservation easement have not been acquired prior to issuance of the building permit or grading permits, whichever occurs first, the City shall hold the applicant's contribution in a separate, interest-bearing account until the appropriate lands are identified (through consultation with CDFW and the City) and acquired by the City or preserved through other methods acceptable to the CDFW. The foregoing funds shall be used to compensate for the loss of Swainson's hawk foraging habitat.

New Mitigation Measures

The following mitigation measure(s) would be required to reduce impacts to biological resources to a less-than-significant level:

- **Mitigation Measure IV-1**: If construction occurs during the breeding season (February 1 through August 31), a pre-construction nesting bird survey shall be conducted by a qualified biologist (Project Biologist) throughout the portion of the project site proposed for construction and all accessible areas within a 500-foot radius of proposed construction areas, no more than seven days prior to the initiation of construction. If there is a break in construction activity of more than seven days, then subsequent surveys shall be conducted.
    - If an active raptor nest is found, no construction activities shall take place within 500 feet of the nest until the young have fledged. If active songbird nests are found, a 100-foot no disturbance buffer will be established until the young have fledged. These no-disturbance buffers may be reduced if a smaller, sufficiently protective buffer is proposed by the Project Biologist and approved by the City after taking into consideration the natural history of the species of bird nesting, the proposed activity level adjacent to the nest, the nest occupants' habituation to existing or ongoing activity, and nest concealment (i.e., whether there are visual or acoustic barriers between the proposed activity and the nest). The Project Biologist can visit the nest as needed to determine when the young have fledged the nest and are independent of the site or the nest can be left undisturbed until the end of the nesting season.
    - Survey Report. A report summarizing the survey(s) shall be provided to the City within 30 days of the completed survey and is valid for one construction season. If no nests are found, no further mitigation is required.
    - Increases to Buffers and Completion of Nesting
        - If construction activities will continue within the no-disturbance buffer, then the Project Biologist will be required to monitor the nest. That monitoring will include observations about the bird's behaviors relative to the construction activities. Should construction activities cause a nesting bird to do any of the following in a way that would be considered a result of construction activities: vocalize, make defensive flights at intruders, get up from a brooding position, or fly off the nest, then the exclusionary buffer shall be increased such that activities are far enough from the nest to stop this agitated behavior. The revised no-disturbance buffer will remain in place until the chicks have fledged or as otherwise determined by a qualified biologist in consultation with the City.

- Construction activities without monitoring may only resume within the no-disturbance buffer after a follow-up survey by the Project Biologist has been conducted and a report has been prepared indicating that the nest (or nests) are no longer active, and that no new nests have been identified.

- **Mitigation Measure IV-2:** A targeted burrowing owl nest survey shall be conducted of all accessible areas within 500 feet of the proposed construction area within 15 days prior to construction activities utilizing 60-foot transects as outlined in the Staff Report on Burrowing Owl Mitigation (CDFG 2012) (Staff Report). If an active burrowing owl nest burrow (i.e., occupied by more than one adult owl, and/or juvenile owls are observed) is found within 250 feet of a construction area, construction shall cease within 250 feet of the nest burrow until the Project Biologist determines that the young have fledged or it is determined that the nesting attempt has failed. If the applicant desires to work within 250 feet of the nest burrow, the applicant shall consult with CDFW and the City to determine if the nest buffer can be reduced.
    - If construction begins during the non-nesting season, (September 1 through the 14 February), the applicant shall conduct a survey for burrows or debris that represent suitable nesting habitat for burrowing owls within areas of proposed ground disturbance. If overwintering owls are located and cannot be avoided, the applicant may exclude any burrowing owls observed and collapse any burrows or remove the debris in accordance with the methodology outlined in the Staff Report. In accordance with the Staff Report, prior to burrow exclusion and/or closure, a Burrowing Owl Exclusion Plan must be developed and approved by CDFW. As outlined in the Staff Report, components of this plan shall include but not be limited to:
        - Confirm by site surveillance that the burrow(s) is empty of burrowing owls and other species preceding burrow scoping;
        - Type of scope and appropriate timing of scoping to avoid impacts;
        - Occupancy factors to look for and what will guide determination of vacancy and excavation timing (one-way doors should be left in place 48 hours to ensure burrowing owls have left the burrow before excavation, visited twice daily and monitored for evidence that owls are inside and can't escape i.e., look for sign immediately inside the door).
        - How the burrow(s) will be excavated. Excavation using hand tools with refilling to prevent reoccupation is preferable whenever possible (may include using piping to stabilize the burrow to prevent collapsing until the entire burrow has been excavated and it can be determined that no owls reside inside the burrow);
        - Removal of other potential owl burrow surrogates or refugia on site;
        - Photographing the excavation and closure of the burrow to demonstrate success and sufficiency;
        - Monitoring of the site to evaluate success and, if needed, to implement remedial measures to prevent subsequent owl use to avoid take; and
        - How the impacted site will continually be made inhospitable to burrowing owls and fossorial mammals (e.g., by allowing vegetation to grow tall, heavy disking, or immediate and continuous grading) until development is complete.
    - If any nesting burrowing owls are found during the breeding season pre-construction survey, mitigation for the permanent loss of burrowing owl foraging habitat (defined as all areas of suitable habitat within 250 feet of an active nest burrow) shall be accomplished at a 1:1 ratio. The mitigation provided shall be

consistent with recommendations in the CDFW 2012 Staff Report and may be accomplished within the Swainson's Hawk Foraging Habitat mitigation area if burrowing owls have been documented utilizing that area, or if the Project Biologist and the City determine that the area is suitable. The Staff Report recommendations for mitigation land for burrowing owls are as follows:

- Where habitat will be temporarily disturbed, restore the disturbed area to pre-project condition including decompacting soil and revegetating. Permanent habitat protection may be warranted if there is the potential that the temporary impacts may render a nesting site (nesting burrow and satellite burrows) unsustainable or unavailable depending on the time frame, resulting in reduced survival or abandonment. For the latter potential impact, see the permanent impact measures below.
- Mitigate for permanent impacts to nesting, occupied and satellite burrows and/or burrowing owl habitat such that the habitat acreage, number of burrows and burrowing owls impacted are replaced based on the information provided in Appendix A. Note: A minimum habitat replacement recommendation is not provided here as it has been shown to serve as a default, replacing any site-specific analysis and discounting the wide variation in natal area, home range, foraging area, and other factors influencing burrowing owls and burrowing owl population persistence in a particular area.
- Mitigate for permanent impacts to nesting, occupied and satellite burrows and burrowing owl habitat with (a) permanent conservation of similar vegetation communities (grassland, scrublands, desert, urban, and agriculture) to provide for burrowing owl nesting, foraging, wintering, and dispersal (i.e., during breeding and non-breeding seasons) comparable to or better than that of the impact area, and (b) sufficiently large acreage, and presence of fossorial mammals. The mitigation lands may require habitat enhancements including enhancement or expansion of burrows for breeding, shelter and dispersal opportunity, and removal or control of population stressors. If the mitigation lands are located adjacent to the impacted burrow site, ensure the nearest neighbor artificial or natural burrow clusters are at least within 210 meters (Fisher et al. 2007).
- Permanently protect mitigation land through a conservation easement deeded to a nonprofit conservation organization or public agency with a conservation mission, for the purpose of conserving burrowing owl habitat and prohibiting activities incompatible with burrowing owl use. If the project is located within the service area of a Department approved burrowing owl conservation bank, the project proponent may purchase available burrowing owl conservation bank credits.
- Develop and implement a mitigation land management plan to address long-term ecological sustainability and maintenance of the site for burrowing owls (see Management Plan and Artificial Burrow sections below, if applicable).
- Fund the maintenance and management of mitigation land through the establishment of a long-term funding mechanism such as an endowment.
- Habitat should not be altered or destroyed, and burrowing owls should not be excluded from burrows, until mitigation lands have been legally secured, are managed for the benefit of burrowing owls according to Department-approved management, monitoring and reporting plans, and the

endowment or other long-term funding mechanism is in place or security is provided until these measures are completed.

- Mitigation lands should be on, adjacent or proximate to the impact site where possible and where habitat is sufficient to support burrowing owls present. Where there is insufficient habitat on, adjacent to, or near project sites where burrowing owls will be excluded, acquire mitigation lands with burrowing owl habitat away from the project site. The selection of mitigation lands should then focus on consolidating and enlarging conservation areas located outside of urban and planned growth areas, within foraging distance of other conserved lands. If mitigation lands are not available adjacent to other conserved lands, increase the mitigation land acreage requirement to ensure a selected site is of sufficient size. Offsite mitigation may not adequately offset the biological and habitat values impacted on a one to one basis. Consult with the Department when determining offsite mitigation acreages.
- Evaluate and select suitable mitigation lands based on a comparison of the habitat attributes of the impacted and conserved lands, including but not limited to: type and structure of habitat being impacted or conserved; density of burrowing owls in impacted and conserved habitat; and significance of impacted or conserved habitat to the species range-wide. Mitigate for the highest quality burrowing owl habitat impacted first and foremost when identifying mitigation lands, even if a mitigation site is located outside of a lead agency's jurisdictional boundary, particularly if the lead agency is a city or special district.
- Select mitigation lands taking into account the potential human and wildlife conflicts or incompatibility, including but not limited to, human foot and vehicle traffic, and predation by cats, loose dogs and urban-adapted wildlife, and incompatible species management (i.e., snowy plover).
- Where a burrowing owl population appears to be highly adapted to heavily altered habitats such as golf courses, airports, athletic fields, and business complexes, permanently protecting the land, augmenting the site with artificial burrows, and enhancing and maintaining those areas may enhance sustainability of the burrowing owl population onsite. Maintenance includes keeping lands grazed or mowed with weedeaters or push mowers, free from trees and shrubs, and preventing excessive human and human-related disturbance (e.g., walking, jogging, off-road activity, dog-walking) and loose and feral pets (chasing and, presumably, preying upon owls) that make the environment uninhabitable for burrowing owls.
- If there are no other feasible mitigation options available and a lead agency is willing to establish and oversee a Burrowing Owl Mitigation and Conservation Fund that funds on a competitive basis acquisition and permanent habitat conservation, the project proponent may participate in the lead agency's program.

- **Mitigation Measure IV-4 (Mitigation Measure 3.4-7 from The Campus Project DEIR):** The project proponent shall implement the following measure to avoid or minimize impacts on potentially jurisdictional waters only if the project constructs the off-site water and sewer infrastructure improvements in lieu of these improvements being completed by other parties:
  - Before any activities that would result in discharge, fill, removal, or hydrologic interruption of any of the water features occur within the project site, the project

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proponent shall obtain an approved jurisdictional delineation (AJD) from the USACE.

- For any impacts on jurisdictional features, the project proponent shall obtain the appropriate CWA Section 404 and or 401 permits. All permit conditions including required avoidance, minimization, and mitigation measures included as conditions of the permit shall be followed.
- Section 404 authorization from the USACE and a Section 401 Water Quality Certification from the RWQCB shall be required prior to the start of construction that would impact any waters of the U.S. Any waters of the U.S. or jurisdictional wetlands that would be lost or disturbed shall be replaced or rehabilitated on a "no-net-loss" basis in accordance with the USACE mitigation guidelines and City of Dixon requirements. Habitat restoration, rehabilitation, and/or replacement shall be at a location and by methods agreeable to the agencies.

If a 404 permit is required for the proposed project, then water quality concerns during construction shall be addressed in the Section 401 water quality certification from the Regional Water Quality Control Board. A Storm Water Pollution Prevention Plan (SWPPP) shall also be required during construction activities. SWPPPs are required in issuance of a National Pollutant Discharge Elimination System (NPDES) construction discharge permit by the U.S. Environmental Protection Agency. Implementation of Best Management Practices (BMPs) during construction is standard in most SWPPPs and water quality certifications. Examples of BMPs include stockpiling of debris away from regulated wetlands and waterways; immediate removal of debris piles from the site during the rainy season; use of silt fencing and construction fencing around regulated waterways; and use of drip pans under work vehicles and containment of fuel waste throughout the site during construction.

If the ditches are determined to not be subject to federal jurisdiction, then these features may still be subject to waste discharge requirements under the Porter-Cologne Water Quality Control Act. Section 13260(a) of the Porter-Cologne Water Quality Control Act (contained in the California Water Code) requires any person discharging waste or proposing to discharge waste, other than to a community sewer system, within any region that could affect the quality of the waters of the State (all surface and subsurface waters) to file a report of waste discharge. The discharge of dredged or fill material into the ditches may constitute a discharge of waste that could affect the quality of waters of the State. A report of waste discharge shall be filed for impacts to non-federal waters, if required.

V. CULTURAL RESOURCES. *Would the project:*	Where Impact Was Analyzed in Previous CEQA Document(s)?	Do Proposed Changes Involve New or More Severe Impacts?	Any New Circumstances Involving New or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
a. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	Pg.4-66	No	No	No
b. Cause a substantial adverse change in the significance of a unique archaeological resource pursuant to Section 15064.5?	Pgs.4-65 to 4-66	No	No	No
c. Disturb any human remains, including those interred outside of dedicated cemeteries.	N/A	No	No	No

Discussion

a. The NQSP EIR assessed the potential for buildout of the NQSP area to cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5 of the CEQA Guidelines and determined that two structures, the Dudley House and the Vaughn House, are eligible for listing in the California Register of Historical Resources (CRHR). Although buildout of the NQSP area has the potential to significantly impact the foregoing resources, the NQSP EIR concluded that implementation of Mitigation Measures C-B and C-C would be adequate to reduce potential impacts to a less-than-significant level. Neither the Dudley House nor the Vaughn House are located within the project site or the footprint of the potential off-site utilities infrastructure improvements, and, thus, Mitigation Measures C-B and C-C would not apply to the proposed project.

A Cultural Resources Study (CRS) was prepared for the currently proposed project by Tom Origer and Associates (Origer).[16] As part of the CRS, the Northwest Information Center (NWIC) conducted a records search of the California Historical Resources Information System (CHRIS) on August 24, 2023 to determine if additional historical resources have been found on-site since the NQSP EIR was certified. In addition, an intensive field survey of the project site was completed on September 7, 2023; additional historical resources were not identified. Overall, the CRS concluded that the project site does not contain known historical resources and is unlikely to contain previously unrecorded historical resources.

As discussed previously, should The Campus (Dixon 257) Project not be approved, or said project is approved but its associated water and sewer infrastructure will not be installed in sufficient time for the proposed project to proceed, the proposed project would be required to complete off-site utilities infrastructure improvements. The potential for the development footprint of the potential off-site utilities infrastructure improvements to contain known and/or unrecorded historical resources was assessed in a Cultural Resources Assessment (Dixon 257 CRA) prepared by HELIX Environmental Planning, Inc (HELIX).[17] According to The Campus (Dixon 257) CRA, there is a moderate to high potential for The Campus (Dixon 257) project site to contain previously unrecorded historic era cultural resources. The moderate to high cultural potential is associated with the graveled-over area in the western central portion of the project site, which could overlap

16 Tom Origer and Associates. *Cultural Resources Study for the Dixon Innovation Center Project, Dixon, Solano County, California*. September 13, 2023.

17 HELIX Environmental Planning, Inc. *Dixon 257 Development Project Cultural Resources Assessment*. April 2023.

with the alignment and construction work area for the off-site water and sewer utilities. The moderate to high potential is suggested by: (1) the identification of indicators of a historic structure or structures in the vicinity within early 20th-century maps analyzed in the Cultural Resources Assessment and within mid- to late-20th-century historic aerial photographs analyzed in the Cultural Resources Assessment, and (2) by the identification of "Dixon 257 Structural Remain" which consists of historical structural remnants within the graveled-over area, in the form of a three-sided wall feature, likely a subterranean feature associated with a structure, which possessed an inscription of "3-25-1969 R. J." presumably dating the remnants to the mid-20th century. While no other traces of historic-era materials were found in the graveled-over area during the pedestrian survey, and while the presence of these remnants alone likely does not constitute a cultural resource worthy of consideration for the CRHR or NRHP, the presence of the remnants of a structure over 50 years in age, along with cartographic and aerial photographic evidence suggesting that an above ground structure once stood in this area during the latter half of the 20th century, suggests that there is a moderate to high potential to find additional historic era features and/or artifacts within the vicinity of the gravel-covered area.

Mitigation Measures V-1 and V-2 (incorporated by reference from The Campus Project EIR (i.e., Mitigation Measures 3.5-1(a) and (b)), would reduce the potential impact to a less-than-significant level, consistent with the conclusion of The Campus Project EIR (pg. 3.5-17).

Based on the above, the currently proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the NQSP EIR. As such, the proposed project would remain consistent with the conclusions of the NQSP EIR.

b. The NQSP EIR assessed the potential for buildout of the NQSP area to cause a substantial adverse change in the significance of a unique archaeological resource pursuant to Section 15064.5 of the CEQA Guidelines and determined that although surface-level archaeological resources were not identified, likely due to the long history of agriculture in the area, construction activities could potentially disturb or destroy significant buried archaeological resources. Therefore, the NQSP EIR concluded that implementation of Mitigation Measure C-A, which requires consultation with a qualified archaeologist if buried archaeological resources are discovered during construction, would be required to reduce potential impacts to a less-than-significant level.

The project-specific CRS did not identify known archaeological resources within the project site based on a records search by the California Historical Resources Information Center, and an intensive pedestrian field survey.

According to The Campus Project EIR (Impact 3.5-2), the findings of the Cultural Resources Assessment concluded that the project site possesses a moderate to high potential to contain previously unrecorded precontact cultural resources. Areas of particular concern include the locations of two (now filled in) historic drainages, which run from west to east across the entire span of the project site, and the gravel-covered area located within the western central portion of the project site. The two drainages are highlighted as having a moderate to high potential to contain precontact resources through both the noted presence of significant precontact resources located along drainages found elsewhere in the Dixon area and project vicinity as well as the presence of two isolated finds (Dixon 257 Isolate 1 and 2) encountered within the western portion of the project site's southern historic drainage during the pedestrian survey. The presence of these

resources at the ground surface within the historic drainage points towards the possibility for additional precontact resources to be located beneath the ground surface.

Given that the historic drainages span the entire Dixon 257 project site, the westernmost portion of the historic drainages overlaps the water and sewer infrastructure alignments. As discussed previously, should The Campus (Dixon 257) Project not be approved, or said project is approved but its associated water and sewer infrastructure will not be installed in sufficient time for the proposed project to proceed, the proposed project would be required to complete off-site utilities infrastructure improvements. Therefore, Mitigation Measure 3.5-2 of The Campus Project EIR is hereby incorporate by reference to satisfactorily address this potential impact; Mitigation Measure 3.5-2 requires implementation of Mitigation Measures 3.5-1(a) and (b), which are already incorporated as new Mitigation Measures V-1 and V-2 below.

In addition, for the proposed project, while known archaeological resources have not been identified on-site, the potential for discovery of previously unrecorded archaeological resources cannot be dismissed, the significance of which could be adversely affected by project buildout. However, implementation of Modified Mitigation Measure C-A from the NQSP EIR, as defined below, would ensure the potential impact would be less-than-significant consistent with the conclusions of the NQSP EIR.

Based on the above, the currently proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the NQSP EIR. As such, the proposed project would remain consistent with the conclusions of the NQSP EIR.

c. The NQSP EIR did not specifically address the potential for the disturbance of human remains within the NQSP area. However, the CRS did not identify known human remains or cemeteries within the project site, and The Campus (Dixon 257) CRA did not identify such remains within the development footprint of the potential off-site utilities infrastructure improvements. Nonetheless, implementation of Mitigation Measure V-3, incorporated by reference from The Campus Project EIR, would be required to ensure that impacts related to the proposed project's potential to disturb human remains, including those interred outside of dedicated cemeteries, is reduced to a less-than-significant level.

Based on the above, the currently proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the NQSP EIR. As such, the proposed project would remain consistent with the conclusions of the NQSP EIR.

Prior Mitigation Measures

None required.

Modified Mitigation Measures

The following modified mitigation measure(s) from the NQSP EIR would apply to the proposed project:

- **Mitigation Measure C-A:** if archaeological remains are uncovered during construction, work within 100 feet of the discovery shall be halted immediately and the project contractor shall notify the applicant, who shall ~~C~~consultant with a qualified archaeologist ~~if buried archaeological deposits are discovered during construction~~. The City shall require that the

applicant include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. Any previously undiscovered resources found during construction shall be recorded on appropriate California Department of Parks and Recreation forms and evaluated for significance in terms of California Environmental Quality Act criteria by a qualified archaeologist. Potentially significant archaeological resources consist of but are not limited to stone, bone, fossils, wood, or shell artifacts or features, including hearths, structural remains, or historic dumpsites. If the resource is determined to be significant under CEQA, the City and a qualified archaeologist shall determine whether preservation in place is feasible. Such preservation in place is the preferred mitigation. If such preservation is infeasible, the qualified archaeologist shall prepare and implement a research design and archaeological data recovery plan for the resource. The archaeologist shall also conduct appropriate technical analyses, prepare a comprehensive written report and file it with the appropriate information center (California Historical Resources Information System), and provide for the permanent curation of the recovered materials.

New Mitigation Measures

The following mitigation measure(s) from The Campus Project DEIR would be required to reduce impacts to cultural resources to a less-than-significant level:

- **Mitigation Measure V-1 (Mitigation Measure 3.5-1(a) from The Campus Project DEIR):** The project proponent shall implement the following measure to avoid or minimize impacts on potential historic resources only if the project constructs the off-site water and sewer infrastructure improvements in lieu of these improvements being completed by other parties:

  The project proponent shall develop and implement an Archaeological Monitoring Program, whereby the project proponents shall retain the services of an experienced archaeologist who will be present on-site to observe ground-disturbing activities requiring grubbing, grading, trenching, or excavation within the development footprint of the potential off-site utilities infrastructure improvements. The Archaeological Monitor will be given access to inspect all ground surface and subsurface modifications, excavations, installations, equipment parking, and any other construction-related activities in the vicinity of the development footprint of the potential off-site utilities infrastructure improvements.

  The archaeological monitoring will consist of on-the-ground and close observation by an experienced archaeologist for any kind of archaeological or cultural remains that might be exposed during ground- disturbing construction activities. Construction activities will be monitored by following the construction equipment as it removes or modifies soils and vegetation, and may involve walking cuts or excavations after the machinery has passed, or standing to the side and observing the soil removal activity. The archaeologist on-site will be given "stop work authority" so that in the event that they observe a change in soil conditions and/or artifacts or structural remains, they shall bring all construction activities within a 164 ft radius of the area to a stop so that they may further assess the find. Further ground disturbances in the vicinity of the find will remain stopped while an assessment is underway and until the archaeologist on-site can provide recommendations for treatment of the discovery. If a potentially significant find cannot be avoided by the project, the retained archaeologist, who meets the Secretary of the Interior's Professional Qualifications Standards, will develop an evaluation plan in consultation with the City that contains a research design to guide assessments of the resource's significance and scientific potential.

- **Mitigation Measure V-2 (Mitigation Measure 3.5-1(b) from The Campus Project DEIR):** The project proponent shall implement the following measure to avoid or minimize impacts on potential historic resources only if the project constructs the off-site water and sewer infrastructure improvements in lieu of these improvements being completed by other parties:

  The project proponent shall develop and implement a Worker Awareness Training Program, where all construction personnel involved in ground-disturbing activities shall be trained in the recognition of possible cultural resources and the protection of such resources. The training program will inform all construction personnel of the procedures to be followed upon the discovery of archaeological materials, including Native American artifacts. Construction personnel will be instructed that cultural resources must be avoided and that all travel and construction activity must be confined to designated roads and areas. The training will include a review of the local, state, and federal laws and regulations related to cultural resources, as well as instructions on the procedures to be implemented should unanticipated resources be encountered during construction, including stopping work in the vicinity of the find and contacting the appropriate environmental compliance specialist.

- **Mitigation Measure V-3 (Mitigation Measure 3.5-3 from The Campus Project DEIR):** If an inadvertent discovery of human remains is made at any time during project-related construction activities or project planning, the following performance standards shall be met before implementing or continuing actions such as construction that may result in damage to or destruction of human remains. In accordance with the California Health and Safety Code (HSC), if human remains are encountered during ground-disturbing activities, the City shall immediately halt potentially damaging excavation in the area of the remains and notify the Solano County Coroner and a qualified archaeologist (meeting the Secretary of the Interior's Professional Qualifications Standards for Archeology) to determine the nature of the remains. The coroner is required to examine all discoveries of human remains within 48 hours of receiving notice of a discovery on private or state lands (HSC Section 7050.5[b]).

  If the human remains are of historic age and are determined by the Solano County Coroner to be not of Native American origin, the City will follow the provisions of HSC Section 7000 et seq. regarding the disinterment and removal of non–Native American human remains.

  If the coroner determines that the remains are those of a Native American, he or she must contact the Native American Heritage Commission (NAHC) by phone within 24 hours of making that determination (HSC Section 7050[c]). After the coroner's findings have been made, the archaeologist and the NAHC-designated Most Likely Descendant, in consultation with the landowner, shall determine the ultimate treatment and disposition of the remains. The responsibilities of the City for acting upon notification of a discovery of Native American human remains are identified in Public Resources Code Section 5097.9 et seq.

VI. ENERGY. *Would the project:*	Where Impact Was Analyzed in Previous CEQA Document(s)?	Do Proposed Changes Involve New or More Severe Impacts?	Any New Circumstances Involving New or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	N/A	No	No	Yes
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	N/A	No	No	Yes

Discussion

a,b. Because Appendix G of the CEQA Guidelines did not previously include a specific section on energy, the NQSP EIR did not include a specific analysis of the potential energy-related impacts of buildout of the NQSP area; however, as efficient use of energy was included in Appendix F of the CEQA Guidelines, increased energy demand associated with buildout of the NQSP area was evaluated within Section 4.9.7, Electricity and Natural Gas, of the NQSP EIR.

Through existing infrastructure, electrical services are provided by the Pacific Gas & Electric Company (PG&E). During construction, the proposed project would be subject to regulations required by the CARB. During operations, the proposed project would be subject to the 2022 Building Energy Efficiency Standards and the 2022 CALGreen standards, as applicable.

Construction Energy Use

Future development of the project site, as well as the potential off-site utilities infrastructure improvements, would involve on-site energy demand and consumption related to use of oil in the form of gasoline and diesel fuel for construction worker vehicle trips, hauling and materials delivery truck trips, and operation of off-road construction equipment. In addition, diesel-fueled portable generators may be necessary to provide additional electricity demands for temporary on-site lighting, welding, and for supplying energy to areas of the site where energy supply cannot be met via a hookup to the existing electricity grid. However, all construction equipment and operation thereof would be regulated per the CARB In-Use Off-Road Diesel Vehicle Regulation. The In-Use Off-Road Diesel Vehicle Regulation is intended to reduce emissions from in-use, off-road, heavy-duty diesel vehicles in California by imposing limits on idling, requiring all vehicles to be reported to CARB, restricting the addition of older vehicles into fleets, and requiring fleets to reduce emissions by retiring, replacing, or repowering older engines, or installing exhaust retrofits. In addition, as a means of reducing emissions, construction vehicles are required to become cleaner through the use of renewable energy resources. The In-Use Off-Road Diesel Vehicle Regulation would therefore help to improve fuel efficiency for equipment used in construction of the proposed project. Technological innovations and more stringent standards are being researched, such as multi-function equipment, hybrid equipment, or other design changes, which could help to further reduce demand on oil and limit emissions associated with construction.

Based on the above, the temporary increase in energy use occurring during future development of the project site, as well as the potential off-site utilities infrastructure improvements, would not result in a significant increase in peak or base demands or require additional capacity from local or regional energy supplies. In addition, future

development would be required to comply with all applicable regulations related to energy conservation and fuel efficiency, which would help to reduce the temporary increase in demand. Furthermore, regulations pertaining to energy use, including, but not limited to, State and federal vehicle standards, are much more stringent than the regulations in place at the time the NQSP EIR was prepared. Therefore, construction energy usage related to the proposed project would be less than what was anticipated in the NQSP EIR for Highway Commercial uses.

Operational Energy Use

Energy use associated with operation of the proposed project would be typical of industrial uses, requiring electricity for interior and exterior building lighting, heating, ventilation, and air conditioning (HVAC), electronic equipment, machinery, appliances, security systems, and more. Operational energy use associated with the future proposed general industrial uses would not be anticipated to differ substantially than operational energy demand from the planned Highway Commercial uses for the site. Maintenance activities during operations, such as landscape maintenance, could involve the use of electric or gas-powered equipment. In addition to on-site energy use, the proposed project would result in transportation energy use associated with employee vehicle trips generated by the proposed project.

All on-site structures would be subject to all relevant provisions of the most recent update of the California Building Standards Code (CBSC), including the Building Energy Efficiency Standards. Adherence to the most recent CALGreen Code and the Building Energy Efficiency Standards would ensure that the proposed structures would consume energy efficiently through the incorporation of such features as door and window interlocks and high efficiency outdoor lighting. In addition, since the NQSP EIR was developed, lighting technology including LED components and programmable lighting, has improved considerably. As such, the proposed lighting is anticipated to consume less energy than what was previously anticipated in the NQSP EIR. In addition, electricity supplied to the project by PG&E would comply with the State's RPS, which requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 60 percent of total procurement by 2030. Thus, a portion of the energy consumed during project operations would originate from renewable sources.

With regard to transportation energy use, the proposed project would comply with all applicable regulations associated with vehicle efficiency and fuel economy. Furthermore, regulations pertaining to energy usage, such as State and federal vehicle standards, are much more stringent than the regulations that were in place at the time the NQSP EIR was prepared. Therefore, operational energy usage from future buildout of the project site would be less than what was anticipated in the NQSP EIR.

Conclusion

Based on the above information, the currently proposed project would involve energy use associated with construction activities and operations; however, the proposed project would comply with all applicable State energy standards, which would ensure that construction and operation of the proposed project would not result in wasteful, inefficient, or unnecessary consumption of energy resources or conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Furthermore, as discussed above, regulations pertaining to energy usage are much more stringent than the regulations that were in place at the time the NQSP EIR was prepared. Therefore, energy usage from

buildout of the proposed project would be less than what was anticipated in the NQSP EIR, and impacts related to energy use would be less than significant.

Prior Mitigation Measures
None Required.

New Mitigation Measures
None Required.

RESOLUTION NO.: 25-005
DATE: JAN 07 2025

VII. GEOLOGY AND SOILS. *Would the project:*	Where Impact Was Analyzed in Previous CEQA Document(s)?	Do Proposed Changes Involve New or More Severe Impacts?	Any New Circumstances Involving New or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. ii. Strong seismic ground shaking? iii. Seismic-related ground failure, including liquefaction? iv. Landslides?	Pgs. 4.26 and 4.27	No	No	No
b. Result in substantial soil erosion or the loss of topsoil?	Pg. 4-25	No	No	No
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	N/A	No	No	No
d. Be located on expansive soil, as defined in Table 18-1B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	Pg. 4-26	No	No	No
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	N/A	No	No	No
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	N/A	No	No	No

Discussion

ai.-aiv. The NQSP EIR analyzed the potential of buildout of the NQSP area to expose people or structures to groundshaking and liquefaction due to a possible seismic event along active faults in the area, but did not specifically address impacts related to potential substantial adverse effects, including the risk of loss, injury, or death involving the rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault, or landslides. Nonetheless, the NQSP EIR concluded that with incorporation of Mitigation Measures G-E through G-G, and applicable regulatory requirements, all impacts would be reduced to a less-than-significant level.

According to the Geotechnical Exploration prepared for the project site by ENGEO Incorporated (ENGEO) (see Appendix C),[18] the project site is not located within an earthquake fault zone as currently designated by the Alquist-Priolo Earthquake Fault Zone Act. However, the NQSP EIR concluded that because the area could be subject to significant ground shaking associated with the San Andreas Fault system, located approximately 60 miles west of the NQSP area, Mitigation Measures G-E through G-G would be required to mitigate the effects of potential hazards associated with seismic ground shaking; the proposed project would be required to comply with the foregoing mitigation measures. Compliance with such would ensure that potential impacts related to seismic hazards associated with future buildout of the project site, as well as the potential off-site utilities infrastructure improvements, would be less than significant.

Liquefaction, which occurs when saturated, loose materials (e.g., sand or silty sand) are weakened and transformed from a solid to a near-liquid state as a result of increased pore water pressure, more often occurs in areas underlain by young alluvium where the groundwater table is higher than 50 feet below ground surface (bgs). According to the Geotechnical Exploration, based on the groundwater being over 50 feet bgs, the potential for liquefaction at the site is low during seismic shaking. Similarly, both the project site and the development footprint of the potential off-site utilities infrastructure improvements are flat and do not contain slopes and, thus, are unlikely to be subject to seismically induced landslides.

Based on the above information, the currently proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the NQSP EIR. Therefore, the proposed project would be consistent with the conclusions of the NQSP EIR.

b. The NQSP EIR analyzed the potential for buildout of the NQSP area to result in substantial soil erosion or the loss of topsoil, and concluded that with incorporation of Mitigation Measures G-A and G-B, impacts would be reduced to a less-than-significant level. Future development of the project site, as well as the potential off-site utilities infrastructure improvements, would be subject to the foregoing measures, which require the preparation of an erosion control plan and that disturbed areas not be left exposed during the winter rainy season. Furthermore, future site-specific development would be evaluated for conformance with the CBSC, Dixon General Plan, Municipal Code, and other regulations that address construction activities and soil erosion. Each phase of project construction disturbing one acre or more of soil would be required to obtain coverage under the Construction General Permit prior to issuance of a grading permit. The Construction General Permit requires development and implementation of a Stormwater Pollution Prevention Plan (SWPPP) and monitoring plan, which must include erosion-control and sediment- control BMPs that would meet or exceed measures required by the Construction General Permit to control stormwater quality degradation due to potential construction-related pollutants. Future construction associated with the proposed project would also be required to implement construction site control BMPs in compliance with the City's National Pollutant Discharge Elimination System (NPDES) Permit (MS4). Project construction activities would also be subject to the City's grading control ordinance, which controls land disturbances, landfill, soil storage, pollution, and erosion and sedimentation resulting from new development and redevelopment, and establishes procedures for the issuance, administration and enforcement of permits for such activities; and storm water control ordinance, which addresses City requirements for stormwater

[18] ENGEO Incorporated. *Pedrick Road Warehouse, Dixon, California Geotechnical Exploration.* June 21, 2022.

management and discharge control, including controlling erosion, sedimentation, and other pollutant runoff. Given compliance with the foregoing requirements, as well as Mitigation Measures G-A and G-B, potential impacts associated with erosion and loss of topsoil would be less than significant.

Based on the above, the currently proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the NQSP EIR. Therefore, the proposed project would be consistent with the conclusions of the NQSP EIR.

c. The NQSP EIR does not specifically address potential impacts related to being located on a geologic unit or soil that is unstable. However, as discussed above, neither the project site nor the disturbance footprint of the potential off-site utilities infrastructure improvements are located on or near a slope and, thus, would not be subject to landslide or lateral spreading. In addition, according to the Geotechnical Exploration, the risk of liquefaction, subsidence, and collapse at the project site is negligible. Furthermore, while the disturbance footprint of the potential off-site utilities infrastructure improvements may be underlain by alluvium that could be susceptible to collapse if the soils were exposed to excessive moisture, as discussed above, future improvements would be evaluated for conformance with the CBSC, Dixon General Plan, Municipal Code, and other regulations related to geologic conditions, compliance with which would ensure that impacts related to such would be less than significant.

Based on the above, the currently proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the NQSP EIR. Therefore, the proposed project would be consistent with the conclusions of the NQSP EIR.

d. Expansive soils are soils which undergo significant volume change with changes in moisture content. Specifically, such soils shrink and harden when dried and expand and soften when wetted, potentially resulting in damage to building foundations. Placement of buildings on unstable soils can result in structural failure. The NQSP EIR determined that the NQSP area has a moderate to high potential for shrink/swell behavior and, thus, development could result in risks to life or property. However, the NQSP EIR concluded that implementation of Mitigation Measures G-C and G-D, which require a geotechnical investigation of on-site soils for shrink/swell behavior and avoidance of such hazards, would reduce potential impacts to a less-than-significant level.

Consistent with the requirements of Mitigation Measure G-C, a Geotechnical Exploration has been conducted for the project site; as such, Mitigation Measure G-C would not be required for the proposed project. The Geotechnical Exploration concluded that expansive clay with medium to high shrink/swell potential underlies the majority of the project site. As such, future development of the project site could be subject to risks to life or property related to expansive soils.

However, the proposed project would be required to comply with all applicable CBSC standards to ensure the structural integrity of the proposed structures. In addition, the Geotechnical Exploration includes recommendations to address potential impacts related to expansive soils and settlements, including measures pertaining to foundations, pavements, fill compaction, acceptable fill, slope gradients, and the completion of a design-level geotechnical report that would involve additional subsurface exploration based on the development layout. Implementation of Mitigation Measure G-D, as modified

below, would ensure that the site-specific recommendations of the Geotechnical Exploration are implemented, and that impacts related to expansive soils are reduced to a less-than-significant level.

Based on the above, the currently proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the NQSP EIR. Therefore, the proposed project would be consistent with the conclusions of the NQSP EIR.

e. Because development within the NQSP area would obtain wastewater treatment and sewer services from connections to the existing sewer infrastructure in the vicinity, and septic systems would not be developed as part of future development, impacts related to septic systems were not evaluated in the NQSP EIR.

The currently proposed project would either connect to the sewer infrastructure constructed as part of The Campus (Dixon 257) Project or, if The Campus (Dixon 257) Project is not approved, or said project is approved but its associated sewer infrastructure will not be installed in sufficient time for the proposed project to proceed, the currently proposed project would include off-site sewer infrastructure connections to the existing sewer main in Vaughn Road to the south. The proposed project would not include installation of septic tanks or construction of alternative wastewater systems. Therefore, the currently proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the NQSP EIR. As such, the proposed project would remain consistent with the conclusions of the NQSP EIR.

f. The NQSP EIR did not explicitly assess the potential for buildout of the NQSP area to directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. Future buildout of the project site, as well as the potential off-site utilities infrastructure improvements, would involve construction activities such as grading, excavation, and other ground-disturbing activities with the potential to result in the accidental destruction or disturbance of paleontological resources. As discussed in the Dixon General Plan EIR, numerous paleontological resources have been discovered throughout the Sacramento Valley and Solano County regions, including Vacaville and Putah Creek, and while paleontological resources have not been discovered within the City, there is potential that resources could be found in the future.

The project site, as well as the development footprint of the potential off-site utilities infrastructure improvements, is currently vacant/undeveloped, consisting primarily of farmland, and has undergone extensive previous grading. While the project is not anticipated to directly or indirectly impact previously undiscovered paleontological resources, there is the potential for project excavation activities to encounter paleontological resources. However, the General Plan includes Mitigation Measure GEO-1, with which the project would be required to comply. Mitigation Measure GEO-1 requires halting work if paleontological resources are discovered during construction, and proper treatment of said resources.

Based on the above, the currently proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the NQSP EIR. Therefore, the proposed project would be consistent with the conclusions of the NQSP EIR.

Prior Mitigation Measures

The following mitigation measure(s) from the NQSP EIR would apply to the proposed park project:

- **Mitigation Measure G-A**: An erosion control plan shall be prepared prior to construction. This plan shall include standards for permanent erosion control design, requirements for full establishment of vegetation, and emphasize drought-tolerant and climate-adapted vegetation.
- **Mitigation Measure G-B**: Disturbed areas of the project site that are not actively under construction during the winter rainy season shall not be left exposed for more than one month.
- **Mitigation Measure G-E:** All structures and new building constructed within the project area shall conform to the lates seismic structural standards of the Uniform Building Code (UBC) as a minimum standard.
- **Mitigation Measure G-F:** Plans for individual buildings subject to public occupancy shall be accompanied by an investigative report prepared for a geologist specialized in engineering. This report shall identify underlying geology including depth of water table depth to bedrock, and presence and characteristics of sand lenses. Necessary structural measures to adequately respond to the degree of probable risk attributable to these underlying formations shall be recommended.
- **Mitigation Measure G-G:** No public or private electrical, water, wastewater or gas lines shall be permitted to cross identified potential ground failure areas without sufficient precautionary emergency provisions for: rapid shut-off, minimum disruption of service, and any adverse impact on adjoining and surrounding uses in the event of seismic-induced ground failure.

Modified Mitigation Measures

The following mitigation measure(s) from the NQSP EIR have been modified to apply to the proposed project:

- **Mitigation Measure G-D:** In conjunction with the submittal of improvement plans, the project applicant shall submit a Design-Level Geotechnical Report for the proposed project, prepared by a licensed geotechnical engineer. Hazards associated with shrink/swell soils shall be avoided through proper construction methods which include site drainage, and responsive grading, excavation and foundation design. Potential adverse effects due to soils with high shrink/swell are avoidable if these soils are identified prior to the design and construction, and appropriate design and construction methods are applied. The findings and recommendations contained in the Design-Level Geotechnical Report shall be incorporated into the project plans. Proof of compliance with all recommendations specified in the Design-Level Geotechnical Report shall be subject to review and approval by the City Engineer.

New Mitigation Measures

None required.

VIII. GREENHOUSE GAS EMISSIONS. *Would the project:*	Where Impact Was Analyzed in Previous CEQA Document(s)?	Do Proposed Changes Involve New or More Severe Impacts?	Any New Circumstances Involving New or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	N/A	No	No	No
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gasses?	N/A	No	No	No

Discussion

a,b. Greenhouse gas (GHG) emissions were not addressed in the 1994 EIR. However, potential impacts related to GHG emissions do not constitute "new information of substantial importance" as defined by CEQA Guidelines section 15162, as GHG emissions were known as potential environmental issues before 2002, when the original Granite Lakes Estates EIR was certified.[19] In *Citizens for Responsible Equitable Environmental Development (CREED) v. City of San Diego* (2011) 196 Cal.App.4th 515, the Court of Appeal, Fourth Appellate District, concluded that the issue of GHG emissions and climate change could have been raised at the time that the original EIR was prepared (in 1994). For this reason, the lead agency was not required to prepare a Supplemental or Subsequent EIR. In the CREED case, the court noted that scientists and the government have been aware that GHG emissions could trigger climatic changes as early as the 1970's, or before. Specifically, the Court of Appeal noted that in *Massachusetts v. E.P.A.* (2007) 549 U.S. 497, 507, the United States Supreme Court stated the following:

> *"In the late 1970's, the Federal Government began devoting serious attention to the possibility that carbon dioxide emissions associated with human activity could provoke climate change. In 1978, Congress enacted the National Climate Program Act, 92 Stat. 601, which required the President to establish a program to 'assist the Nation and the world to understand and respond to natural and man-induced climate processes and their implications[.]' [citation] President Carter, in turn, asked the National Research Council, the working arm of the National Academy of Sciences, to investigate the subject. The Council's response was unequivocal: 'If carbon dioxide continues to increase, the study group finds no reason to doubt that climate changes will result and no reason to believe that these changes will be negligible. A wait-and-see policy may mean waiting until it is too late.'"*

The Court of Appeal concluded by stating that "[t]he effect of GHG emissions on climate could have been raised in 1994 when the City considered the FEIR." In *Concerned Dublin Citizens v. City of Dublin* (2013) 214 Cal.App.4th 1301, the Court of Appeal for the Fourth Appellate District adopted this reasoning as its own, reaching exactly the same conclusion on similar facts.

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[19] As explained in a series of cases, most recently in *Concerned Dublin Citizens v. City of Dublin (2013) 214 Cal. App. 4th 1301*. Also see, *Citizens of Responsible Equitable Development v. City of San Diego (2011) 196 Cal.App.4th 515.*

Again, in *Citizens Against Airport Pollution v. City of San Jose* (2014) 227 Cal.App.4th 788, the Court of Appeal, Sixth Appellate District, considered whether the lack of GHG and climate change analysis in a 1997 EIR and 2003 SEIR precluded adoption of an addendum. The court relied on previous case law to conclude that the potential environmental impact of GHG emissions was known or could have been known at the time of certification of the 1997 EIR and 2003 SEIR. The court thus upheld the eighth addendum that the City of San Jose had prepared after having completed the 1997 and 2003 EIRs.

The conclusions that were made in the *CREED*, *Dublin Citizens*, and *Citizens Against Airport Pollution* cases can also be made regarding the 1994 NQSP EIR. Under the law, as set forth in these cases, the City may not undertake the preparation of a Supplemental or Subsequent EIR based solely on issues relating to climate change. Thus, the overall creation of GHG emissions from future development within the project site cannot under the law constitute a new significant impact or new information of substantial importance.

Furthermore, in addition to the City's General Plan Update, a number of regulations have been enacted since the 1994 EIR was certified for the purpose of, or with an underlying goal for, reducing GHG emissions, such as the California Green Building Standards Code (CALGreen Code) and the California Building Energy Efficiency Standards Code. The 2022 Building Energy Efficiency Standards is a portion of the CBSC, which expands upon energy efficiency measures from the 2019 Building Energy Efficiency Standards. Such regulations have become increasingly stringent since the 1994 EIR was certified. The proposed project would be required to comply with all applicable regulations associated with GHG emissions, including the CALGreen Code and California Building Energy Efficiency Standards Code.

In summary, based on the above, no new analysis is required to be completed for the modified project. Pursuant to CEQA Guidelines Section 15164, subdivision (a), the City finds that "none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred."

Prior Mitigation Measures

None Required.

New Mitigation Measures

None Required.

RESOLUTION NO.: 25-005

DATE: JAN 07 2025

IX. HAZARDS AND HAZARDOUS MATERIALS. *Would the project:*	Where Impact Was Analyzed in Previous CEQA Document(s)?	Do Proposed Changes Involve New or More Severe Impacts?	Any New Circumstances Involving New or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Pgs. 4-143 to 4-144	No	No	No
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment?	Pgs. 4-142 to 4-143	No	No	No
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	N/A	No	No	No
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	N/A	No	No	No
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 or excessive noise for people residing or working in the project area?	N/A	No	No	No
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	N/A	No	No	No
g. Expose people or structures, either directly or indirectly, to the risk of loss, injury or death involving wildland fires?	N/A	No	No	No

Discussion

a. The NQSP EIR analyzed the potential for future uses within the NQSP area to use and store hazardous materials and determined that with implementation of Mitigation Measure PH-E, which requires the preparation of a hazardous waste reduction program for all businesses handling hazardous waste, would reduce the impact to a less-than-significant level.

Although the project site is intended for future development of industrial uses, specific tenants have not been identified at this time, nor is a specific development proposal under consideration as part of the project. Operations associated with the proposed project would be typical of other industrial uses in the City, and would be governed by the uses permitted for the site pursuant to the site's Industrial land use and zoning designations. Given that the proposed project includes a SPA, following implementation of the proposed

project, the project site's NQSP land use designation would be General Industrial, which would allow for the development of a variety of large and small scale industrial, warehouse, and distribution uses, and would be generally consistent with the IG zoning designation as defined in Chapter 18.06, Industrial Districts, of the City of Dixon Municipal Code.

The potential use and storage of hazardous materials associated with future buildout of the project site, as well as the potential off-site utilities infrastructure improvements, would be subject to the provisions of the California Health and Safety Code, as well as regulations by the County's Hazardous Materials Program (HMP), which is a part of the Solano County Department of Resource Management's Environmental Health Services Division. The HMP is the Certified Unified Program Agency (CUPA) for all cities and unincorporate areas within the County. The Unified Program is a statewide program overseen by the California EPA (CalEPA) that delegates the responsibility of applying regulatory standards established by State agencies to local agencies through inspections, permitting, and enforcement activities. The Unified Program encompasses regulatory standards from the Governor's Office of Emergency Services (OES), Department of Toxic Substances Control (DTSC), Office of the State Fire Marshal (OSFM), the State Water Resources Control Board, and CalEPA. The HMP regulates all of the program elements in the County by issuing permits, inspecting facilities, investigating complaints, and performing enforcement as necessary.

Pursuant to the requirements established by the HMP, any future tenants of the project site that would use or store hazardous materials would be required to prepare a Hazardous Materials Business Plan (HMBP) to ensure impacts related to such operations would not occur. The HMBP is required for businesses with hazardous materials on-site and must detail the quantity of such materials stored on the premises, spill prevention and control measures, and an emergency response plan to address potential incidents related to such materials such as a release, fire, and/or disaster. In addition, pursuant to Section 6.03.040 of the City of Dixon Municipal Code, any future tenant of the project site who uses or handles a hazardous material would be required to submit a completed disclosure form prepared by the City's Fire Department.

Overall, the proposed project would be required to comply with all applicable provisions of the California Health and Safety Code, as well as all applicable provisions set forth by the County's HMP, including the preparation of a HMBP. Compliance with such would ensure that impacts related to the routine transport, use, or disposal of hazardous materials would be less-than-significant. As such, Mitigation Measure PH-E would not be applicable to the proposed project.

Based on the above information, the currently proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the NQSP EIR. Therefore, the proposed project would be consistent with the conclusions of the NQSP EIR.

b. The NQSP EIR analyzed the potential for buildout of the NQSP area to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment, specifically related to the presence of underground storage tanks (USTs) within the area as well as the use and disposal of pesticides and herbicides. The NQSP EIR concluded that implementation of Mitigation Measures PH-A, PH-B, and PH-C would reduce potential impacts related to such to a less-than-significant level.

A Phase I Environmental Site Assessment (ESA) was prepared for the proposed project by Brusca Associates, Inc. (Brusca) for the purpose of identifying potential recognized environmental conditions (RECs) associated with the project site (see Appendix D).[20] The Phase I ESA was prepared in conformance with the general scope and limitations of the American Society for Testing and Materials' ASTM Standard Practice E1527-13. Past and current uses of the project site and surrounding properties were evaluated by reviewing available historical map coverage, aerial photographs, and chain of title documents, as well as conducting personal interviews and site reconnaissance. According to the Phase I ESA, the project site has been used for agricultural uses since at least the 1930s, but has remained otherwise undeveloped. The Phase I ESA (pg. 9) notes that previous agricultural chemical applications to farmland typically do not seriously impair the soil chemistry. Pesticide contamination is most commonly attributable to the rinsing of equipment after field application, when rinsing occurs in one place over a period of time. Such rinsing activities are usually performed at a farming headquarters or at an airport supporting crop dusting aircraft; research has revealed no evidence of any previous crop dusting or farm headquarters facilities on the subject property. Furthermore, organochlorine soil contamination is typically a concern for residential development because occupants could be continually exposed to harmful effects. Any future on-site development would be industrial in nature and no residential development would be allowed on-site.[21]

As such, the Phase I ESA did not identify any existing, controlled or historical RECs in connection with the project site, and Mitigation Measures PH-A, PH-B, and PH-C would not apply to the currently proposed project.

It is noted that a Phase I ESA prepared for The Campus (Dixon 257) Project identified potential RECs within The Campus (Dixon 257) Project, specifically an abandoned landfill and a former 10,000-gallon diesel aboveground storage tank (AST).[22] The abandoned landfill was fully excavated and all refuse was removed, and the AST was removed; the Central Valley Regional Water Quality Control Board (CVRWQCB) prepared a letter dated September 23, 2020 indicating that further environmental work related to the AST is not necessary. As such, neither of the foregoing factors are considered to be an REC. In addition, the disturbance footprint of the potential off-site utilities infrastructure improvements would not overlap with either the abandoned landfill or the AST. Therefore, neither future development of the project site nor development of the potential off-site utilities infrastructure improvements would create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment.

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20 Brusca Associates, Inc. *Pedrick Road at I80 Property Phase I ESA*. March 17, 2022.

21 Moreover, in *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369 (*CBIA*), the California Supreme Court held that "agencies subject to CEQA generally are not required to analyze the impact of existing environmental conditions on a project's future users. But when a proposed project risks exacerbating those environmental hazards or conditions that already exist, an agency must analyze the potential impact of such hazards on future users. In those specific instances, it is the impact of the project on the environment – and not the impact of the environment on the project – that compels an evaluation of how future residents or users could be affected by exacerbated conditions." (*Id.* at pp. 377-378.). Potential pesticide-related effects would be considered the environment's effect on the proposed project.

22 Brusca Associates, Inc. *Pedrick Road Property Phase I ESA*. September 30, 2020.

Future construction activities associated with the proposed project would involve the use of heavy equipment, which would contain fuels and oils, and various other products such as concrete, paints, and adhesives. Small quantities of potentially toxic substances (e.g., petroleum and other chemicals used to operate and maintain construction equipment) would be used at the project site and transported to and from the site during construction. However, as noted above, the project contractor would be required to comply with all local City and County ordinances regulating the handling, storage, and transportation of hazardous and toxic materials. Compliance with such regulations would ensure that the proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment during construction activities, particularly associated with construction equipment.

Based on the above information, the currently proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the NQSP EIR. Therefore, the proposed project would be consistent with the conclusions of the NQSP EIR.

c. The NQSP EIR did not address potential impacts related to emitting hazardous emissions or handling hazardous materials within 0.25-mile of an existing or proposed school. However, schools were not located within 0.25-mile of the NQSP area at the time the NQSP EIR was certified; nor have additional schools been constructed within 0.25-mile of the project site since the NQSP EIR was certified. Thus, the currently proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the NQSP EIR. Therefore, the proposed project would be consistent with the conclusions of the NQSP EIR.

d. The NQSP EIR did not address potential impacts related to being located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. However, according to the Phase I ESA, the project site is not included on the DTSC Cortese list. Other components of the Cortese List include the list of leaking underground storage tank sites from the California State Water Resources Control Board's (SWRCB's) GeoTracker database, the list of solid waste disposal sites identified by the SWRCB, and the list of active Cease and Desist Orders (CDO) and Cleanup and Abatement Orders (CAO) from the SWRCB. According to the Phase I ESA, the project site is not located on the Cortese List. In addition, according to the Phase I ESA prepared for The Campus (Dixon 257) Project, the disturbance footprint of the potential off-site utilities infrastructure improvements would not overlap with any site listed on the Cortese List. Therefore, the currently proposed project would not result in new significant impacts or substantially more severe significant impacts beyond what were analyzed in the NQSP EIR, and the proposed project is consistent with the conclusions of the NQSP EIR.

e. The NQSP EIR did not address potential impacts related to being located within an airport land use plan or being located within two miles of an airport. However, an airport was not located within two miles of the NQSP area at the time the NQSP EIR was certified; a new airport has not been constructed within two miles of the project site since the NQSP EIR was drafted. Thus, the currently proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the NQSP EIR. Therefore, the proposed project would be consistent with the conclusions of the NQSP EIR.

f. The NQSP EIR did not address potential impacts related to impairing implementation of or physically interfering with an adopted emergency response plan or emergency evacuation plan. Future development of the project site would not impair or physically interfere with an adopted emergency response plan or emergency evacuation plan. Fire and emergency services at the project site are provided by the Dixon Fire Department. Development of the project would be required to comply with applicable City codes and regulations pertaining to emergency response and evacuation plans. Future project-related development would also include improvements to the half sections of Pedrick Road and Professional Drive along its frontage, which could improve emergency access through the area. Prior to construction of future development, proposed site plans would be required to undergo review by the Dixon Fire Department to ensure that adequate emergency access would be maintained within the area. The proposed project would also be required to comply with all applicable codes and ordinances for emergency access, including resolving any deficiencies in access that could preclude emergency evacuation or emergency response identified by the fire department. During project operation, the City and/or County Emergency Operations Plan (EOP) would be implemented and emergency response and evacuation would occur dependent upon the emergency situation, consistent with the respective EOPs. Therefore, the project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; impacts would be less than significant.

Based on the above information, the currently proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the NQSP EIR. Therefore, the proposed project would be consistent with the conclusions of the NQSP EIR.

g. Issues related to wildfire hazards are further discussed in Section XX, Wildfire, of this Initial Study/Addendum. The NQSP EIR did not address potential impacts related to wildfire. However, according to the California Department of Forestry and Fire Protection's (CAL FIRE) Fire and Resource Assessment Program, the project site is located within a Local Responsibility Area (LRA) – Incorporated.[23] CAL FIRE has determined that the County does not contain Very High Fire Hazard (VHFH) Severity Zones in LRAs. Furthermore, future development within the project site would be required by law to incorporate California Building Code and California Fire Code requirements into all development phases. Fire reduction measures include fire sprinklers, fire resistant coatings, construction and maintenance of fuel breaks, management of fire-prone vegetation along streets, maintenance of clearances around structures, providing minimum street widths and turning radii, limiting the lengths of cul-de-sacs and dead-end streets, limiting excessive street grades, and requiring at least two access roads in and out of developed areas. Compliance with California Building Code regulations, California Fire Code requirements, and other state and local fire safety requirements would minimize wildland fire risks at the project site, and a less-than-significant impact would occur.

Based on the above information, the currently proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the NQSP EIR. Therefore, the proposed project would be consistent with the conclusions of the NQSP EIR.

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[23] California Department of Forestry and Fire Protection. *Solano County: Fire Hazard Severity Zones In SRA*. Available at: https://cdnverify.osfm.fire.ca.gov/media/5wwjs5hp/fhsz_county_sra_11x17_2022_solano_ada.pdf. Accessed October 2024.

Prior Mitigation Measures
None Required.

New Mitigation Measures
None Required.

X. HYDROLOGY AND WATER QUALITY. *Would the project:*	Where Impact Was Analyzed in Previous CEQA Document(s)?	Do Proposed Changes Involve New or More Severe Impacts?	Any New Circumstances Involving New or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	Pgs. 4-34 to 4-35	No	No	No
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	N/A	No	No	No
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: i. Result in substantial erosion or siltation on- or off-site; ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or iv. Impede or redirect flood flows?	Pg. 4-34	No	No	No
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	N/A	No	No	No
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	N/A	No	No	No

Discussion

a. The NQSP EIR analyzed the potential for buildout of the NQSP area to result in changes to the quality of runoff and determined that various pollutants generated by human activity, such as fertilizers and fine sediments, could accumulate on impervious surfaces and be subsequently washed off and transported into surface water courses during a storm event, which would result in a potentially significant impact. However, the NQSP EIR concluded that implementation of Mitigation Measure WQ-C, which requires the development of a surface water quality control plan prior to commencement of on-site grading, would adequately reduce the potential impact to a less-than-significant level.

Future development associated with the proposed project would be subject to compliance with multiple regulations that have been instituted subsequent to the certification of the NQSP EIR. Water quality degradation is regulated by the federal NPDES Program, established by the Clean Water Act (CWA), which controls and reduces pollutants to water bodies from point and non-point discharges. In California, the NPDES permitting program

is administered by the SWRCB through nine RWQCBs. As discussed in Section VII, Geology and Soils, of this Initial Study/Addendum, Section 16.04.040 of the City's Municipal Code requires new development within the City that disturbs one or more acres of land to comply with the NPDES General Construction Permit. Compliance with the Construction General Permit would include the preparation of a SWPPP, which would incorporate BMPs to control sedimentation, erosion, and hazardous materials contamination of runoff during construction. Additionally, Section 16.04.040 of the Municipal Code necessitates that projects subject to the NPDES Construction General Permit prepare an Erosion and Sediment Control (ESC) plan incorporating BMPs to control sedimentation, erosion, and hazardous materials contamination of runoff during construction. Although development of the project site is not currently proposed, future development of the site could include industrial uses well in excess of one acre. Therefore, future development of the project site would be subject to the State NPDES General Permit conditions. Furthermore, because the potential off-site utilities infrastructure improvements would result in the disturbance of over one acre, such development would also be subject to the State NPDES General Permit conditions.

Following future development of the project site, impervious surfaces on the project site could contribute incrementally to the degradation of downstream water quality during storm events. During the dry season, vehicles and other urban activities may release contaminants onto the impervious surfaces, where they would accumulate until the first storm event. During the initial storm event, or first flush, the concentrated pollutants would be transported via stormwater runoff from the site to the stormwater drainage system and eventually a downstream waterway. Typical urban pollutants that would likely be associated with the proposed project include sediment, herbicides and pesticides, oil and grease, nutrients, metals, bacteria, and trash. In addition, stormwater runoff could cause soil erosion if not properly addressed and provide a more lucrative means of transport for pollutants to enter the waterways.

The City of Dixon is listed by the RWQCB as a NPDES Phase II program municipality. As such, permanent stormwater management measures for development in the City must be designed in accordance with the State's Phase II Small MS4 General Permit, the development standards of which have been adopted by reference in Section 16.06.120 of the City's Municipal Code. The Phase II Small MS4 General Permit requires that permanent stormwater control measures be incorporated into the proposed project to ensure that new development does not result in the discharge of polluted water or the increase in sources of polluted runoff. Regulated projects under the Phase II Small MS4 General Permit are required to divide the project area into drainage management areas (DMAs) and implement and direct water to appropriately-sized temporary control measures (TCMs), consistent with the sizing standards in Section E.12.e.(ii)(c) of the Provisions for all Small MS4 Permittees.[24] TCMs are designed after the inclusion of Site Design Measures (SDMs) consistent with the standards of Section E.12.b. and E.12.e.(ii)(d). Baseline Hydromodification Measures are implemented consistent with the prescriptive standards of Section E.12.e.(ii)(f). Regulated projects must additionally include source control BMPs where possible. Future development of the project site associated with the proposed project would be required to comply with the applicable standards set forth in Section 16.06.120 of the City's Municipal Code.

[24] California State Water Resources Control Board. *Phase II Small Municipal Separate Storm Sewer System (MS4) Program*. Available at: https://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.html. Accessed October 2024.

In addition, all future development of the project site would operate in accordance with the post-construction provisions contained in Section 16.04.040 of the Municipal Code, which requires a Post-Construction ESC plan. The Post-Construction ESC plan must include sufficient engineering analysis to show that the proposed post-construction stormwater management measures are capable of controlling runoff from the project site in compliance with the CWA, all applicable standards and regulations set forth by Chapter 16.04 of the Municipal Code, and such standards and specifications as may be adopted by the City pursuant to Chapter 16.04. The Post-Construction ESC plan must include a statement of the proposed BMPs that would be used to secure the project following completion of construction; provisions for maintenance of all permanent stormwater management facilities; and a landscaping plan for management of vegetation at the site after construction is completed. Additionally, the project would be required to file a Stormwater BMP Operations and Maintenance Agreement with the City, prior to the approval of a grading permit.

As previously discussed, if The Campus (Dixon 257) Project is approved prior to approval of the proposed project, and its storm water infrastructure is in place when the project applicant is ready to proceed with development, then the proposed project's on-site storm drain infrastructure would connect to the off-site retention basin constructed as part of The Campus (Dixon 257) Project. However, if The Campus (Dixon 257) Project is not approved or said project is approved but its associated storm water infrastructure will not be installed in sufficient time for the proposed project to proceed, future buildout of the currently proposed project would include the construction of an on-site retention basin located in the western portion of the project site. The retention basin would address peak flow runoff from the site, as further discussed below, and provide water quality treatment for storm water runoff.

Based on the above, through required compliance with federal, State, and local regulations, and NQSP Mitigation Measure WQ-C, the proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality during construction and operations. Therefore, the currently proposed project would not result in new significant impacts or substantially more severe significant impacts beyond what were analyzed in the NQSP EIR. Thus, the proposed project is consistent with the conclusions of the NQSP EIR.

b,e. The NQSP EIR did not specifically address the potential for buildout of the NQSP area to substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that development would impede sustainable groundwater management of the basin. Nonetheless, it is noted that the City of Dixon is entirely dependent on groundwater drawn from the Solano Groundwater Subbasin. The groundwater levels of the Solano Groundwater Subbasin have been stable in each year since the 1980s, with low levels in the dry season and high levels in the wet season; however, the State has designated the subbasin as a medium-priority groundwater basin. As such, the subbasin is subject to the Sustainable Groundwater Management Act (SGMA), which requires the formation of local groundwater sustainability agencies that must assess conditions in local water basins and adopt locally based groundwater sustainability plans for at least 10 years for basins that cannot demonstrate sustainable yields. As a result, subsequent to the certification of the NQSP EIR, the City became a participant in the Solano Subbasin Groundwater Sustainability Agency (SSGSA), operating under a Joint Powers Authority (JPA) governance structure. The SSGSA is required to complete and maintain a plan for long-term sustainability of the subbasin. The Solano Subbasin Groundwater Sustainability

Plan was approved by the California Department of Water Resources (DWR) on January 18, 2024.[25] Compliance with SGMA legislation, which requires regularly demonstrating that the subbasin is not over-drafted, would ensure that groundwater draws from the Solano Groundwater Subbasin are carefully managed and sustainably used. As a result, buildout of the NQSP area, including future development of the project site, would not substantially deplete groundwater supplies from increased demand.

Furthermore, overall infiltration into the aquifer would remain robust through compliance with existing regulations, such as the incorporation of BMPs and low-impact development (LID) techniques in projects. LID refers to systems and practices that use or mimic natural processes that result in the infiltration, evapotranspiration, or use of stormwater in order to protect water quality and associated aquatic habitat. LIDs include biofiltration to capture and infiltrate stormwater runoff consistent with the City's required compliance with NPDES permitting. Through compliance with existing federal, State, and local programs and regulations, buildout of the NQSP area would result in a less-than-significant impact related to substantial depletion of groundwater supplies or substantial interference with groundwater recharge such that a net deficit in aquifer volume or a lowering of the local groundwater table level would occur.

Although a site plan for the project site is not currently available, future development of the proposed project would be subject to all such regulations. In addition, as discussed previously, if The Campus (Dixon 257) Project is approved prior to approval of the proposed project, on-site storm drain infrastructure would connect to a retention basin constructed as part of The Campus (Dixon 257) Project. However, if The Campus (Dixon 257) Project is not approved or said project is approved but its associated storm water infrastructure will not be installed in sufficient time for the proposed project to proceed, future buildout of the currently proposed project would include the development of an on-site storm drain system that would collect and convey flows to an on-site retention basin located in the western portion of the project site. The retention basin would provide a minimum of 44.3 acre-feet of storage with a percolation rate of two inches per day. As such, the proposed project would include LID techniques that would allow for groundwater recharge.

Based on the above, the currently proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the NQSP EIR. Therefore, the proposed project would be consistent with the conclusions of the NQSP EIR.

c.i-iii. The NQSP EIR determined that because the conversion of predominantly agricultural land to urban uses would have the potential to result in increases in the quantity of surface water runoff, and because of limited downstream flow capabilities at the time the NQSP EIR was certified, buildout of the NQSP was concluded to be dependent on improvements to the City-wide drainage system or on-site drainage facilities. The NQSP EIR concluded that implementation of Mitigation Measure WQ-A, which would require the preparation of a hydraulic analysis to confirm that future development would not result in flooding, as well as Mitigation Measure WQ-B, which requires stormwater drainage infrastructure to adequately accommodate runoff from 10-year and 100-year storm events, impacts related to altering the existing drainage pattern of the NQSP area would be less than significant.

[25] Solano Subbasin Groundwater Sustainability Agency. *Solano Subbasin Groundwater Sustainability Plan*. November 30, 2021.

The project site consists of undeveloped land. Future development of the proposed project would include impervious surfaces, which would alter the existing drainage pattern of the site. As discussed above, future development of the project site would be required to comply with Section 16.04.040 of the Municipal Code and the City's Engineering Design Standards, which would ensure BMPs are incorporated in the Post-Construction ESC and that on-site stormwater runoff is diverted to DMAs for on-site retention and treatment prior to discharge to the City's stormwater system. It is noted that the City's stormwater system has undergone significant improvements since the certification of the NQSP EIR. As required by the City's Engineering Design Standards pertaining to drainage design, the proposed stormwater system would be designed not to affect the existing drainage patterns on adjacent properties.

A Drainage Study has been prepared for the proposed project by Morton & Pitalo (see Appendix E).[26] According to the Drainage Study, based on the assumption that 85 percent of the project site would be developed with impervious surfaces, the proposed on-site retention basin would be adequately sized to accommodate stormwater flows during the 100-year storm event, and increases in peak flow and water surface elevations would not occur upstream or downstream of the project site. The Dixon Innovation Center storm drainpipe system would be tied into the storm drain system constructed with The Campus (Dixon 257) project when available.

Therefore, the proposed project is not anticipated to substantially alter the existing drainage pattern of the site or area in a manner that would result in substantial erosion, siltation, or flooding on- or off-site, create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems, or provide substantial additional sources of polluted runoff. This will be confirmed through implementation of NQSP EIR Mitigation Measures WQ-A and WQ-B at such time that future site-specific development proposals are submitted to the City for the project site.

Based on the above, the currently proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the NQSP EIR. Therefore, the proposed project would be consistent with the conclusions of the NQSP EIR.

c.iv,d. According to the NQSP EIR, because the NQSP is not located within a 100-year floodplain, further discussion was not provided in the EIR regarding risk of flooding, including flooding risk from rising sea levels associated with climate change, or of risk of inundation by mudflow, seiche, or tsunami.

The currently proposed project would be constructed within the footprint of the previously analyzed NQSP area. Based on current FEMA mapping, the project site is located within Zone X, defined as an area of minimal flood hazard.[27] Therefore, the proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the NQSP EIR. As such, the proposed project would be consistent with the conclusions of the NQSP EIR.

Prior Mitigation Measures

The following mitigation measure(s) from the NQSP EIR would apply to the proposed project:

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26 Morton & Pitalo. *Dixon Innovation Center Drainage Study*. October 25, 2022.

27 Federal Emergency Management Agency. *Flood Insurance Rate Map 06095C0200F, Effective August 2, 2012*. Available at: https://msc.fema.gov/portal/search?AddressQuery=Dixon%2C%20CA. Accessed October 2024.

- **Mitigation Measure WQ-A**: Prior to commencement of on-site grading, the project shall demonstrate, via a detailed hydraulic analysis of post development topographic and drainage conditions, that the final project design would not substantially cause flooding to adjacent or downstream parcels or conveyance facilities. The project proponent shall participate in city-wide drainage improvements in order to increase downstream flow capacities to accommodate this project.

- **Mitigation Measure WQ-B**: Final detention basin(s) design, conveyance facilities, and management of the proposed facilities on-site shall, as demonstrated by the hydraulic analysis of the project proponent and approved by the City of Dixon, adequately accommodate runoff from a 10-year and 100-year storm event. Ultimate development of the entire site must be considered, although drainage infrastructure construction could be phased as needed.

- **Mitigation Measure WQ-C**: Prior to commencement of on-site grading, the project sponsor shall develop a surface storm water quality control plan, to be implemented and approved by the City of Dixon. The plan shall include, but not necessarily be limited to reducing runoff contaminant concentrations by:
  - Installing sediment and grease traps at all catch basins or within storm drain lines;
  - Properly maintaining sediment and grease traps, with responsibility for maintenance assigned to site operations to be established by the project sponsors prior to completion of construction of the first phase of development;
  - Incorporating infiltration facilities (porous pavement or grass swales) within the project to reduce peak flow of runoff;
  - Reducing source pollution causes through practices such as minimal use of fertilizer, pesticides and herbicides, proper application of water for landscape irrigation, keeping roadway sand parking lots free of litter and sediments, proper methods and locations for disposal of automobile hazardous wastes; and
  - Maximizing distances between inlets and outlets perhaps using elongated basin shapes.

New Mitigation Measures

None Required.

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XI. LAND USE AND PLANNING. *Would the project:*	Where Impact Was Analyzed in Previous CEQA Document(s)?	Do Proposed Changes Involve New or More Severe Impacts?	Any New Circumstances Involving New or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
a. Physically divide an established community?	N/A	No	No	No
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	Pgs. 4-14 to 4-18	No	No	No

Discussion

a. The NQSP EIR did not specifically address potential impacts related to physically dividing an established community. However, the project site is surrounded by agricultural and industrial uses, and is not located near an existing residential development. Therefore, future buildout of the project site would not physically divide an established community, and no impact would occur.

Based on the above, the currently proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the NQSP EIR. Therefore, the proposed project would be consistent with the conclusions of the NQSP EIR.

b. The NQSP EIR assessed the potential for the NQSP to cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect specifically related to the NQSP's consistency with Solano County Local Agency Formation Commission (LAFCo) Guidelines for Annexation. According to the NQSP EIR, within implementation of Mitigation Measure LU-B, which required the NQSP to be reviewed and approved by the Solano County LAFCo prior to annexation to the City of Dixon, impacts related to conflicts with land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect would be less than significant. The NQSP was approved in 1995, and the Plan area annexed into the City; therefore, Mitigation Measure LU-B would not be applicable to the proposed project.

The proposed project would require approval of the proposed SPA to create the General Industrial land use designation and to modify the site's existing NQSP land use designation from Highway Commercial to General Industrial. The new General Industrial NQSP land use designation would allow for the development of a variety of large and small scale industrial, warehouse, and distribution uses, and would be generally consistent with the IG zoning designation as defined in Chapter 18.06, Industrial Districts, of the City of Dixon Municipal Code. Furthermore, this project would bring the NQSP into conformance with the Dixon General Plan 2040 and Zoning Ordinance, as it is currently not in conformance. As such, development within the proposed General Industrial NQSP land use designation would allow for development with a maximum floor area ratio (FAR) of 0.6, minimum lot size of 40,000 sf, and maximum height of 10 feet within 200 feet of a residential district, or 75 feet otherwise. Future development of the project site would be consistent with the requirements of the site's land use and zoning designations. Therefore, the proposed park project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Based on the above, the currently proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the NQSP EIR. Therefore, the proposed project would be consistent with the conclusions of the NQSP EIR.

Prior Mitigation Measures
None Required.

New Mitigation Measures
None Required.

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XII. MINERAL RESOURCES. *Would the project:*	Where Impact Was Analyzed in Previous CEQA Document(s)?	Do Proposed Changes Involve New or More Severe Impacts?	Any New Circumstances Involving New or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	N/A	No	No	No
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	N/A	No	No	No

Discussion

a,b. The NQSP EIR did not include a specific analysis of future buildout of the NQSP area's potential impacts to mineral resources. However, according to the City of Dixon General Plan EIR, other than a few existing idle oil wells, mineral resources have not been identified in the General Plan Planning Area. Therefore, the proposed project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State or in the loss of availability of a locally important mineral resource recovery site.

Based on the above, the currently proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the NQSP EIR. Therefore, the proposed project would be consistent with the conclusions of the NQSP EIR.

Prior Mitigation Measures

None Required.

New Mitigation Measures

None Required.

XIII. NOISE. *Would the project result in:*	Where Impact Was Analyzed in Previous CEQA Document(s)?	Do Proposed Changes Involve New or More Severe Impacts?	Any New Circumstances Involving New or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Pgs. 4-107 to 4-109	No	No	No
b. Generation of excessive groundborne vibration or groundborne noise levels?	N/A	No	No	No
c. For a project located within the vicinity of a private airstrip or 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 expose people residing or working in the project area to excessive noise levels?	N/A	No	No	No

Discussion

a. The NQSP EIR analyzed the potential for buildout of the NQSP area to generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established by the City of Dixon, and concluded that implementation of Mitigation Measures N-A and N-B would be required to ensure impacts related to temporary short-term exposure to construction generated noise would be less-than-significant, and Mitigation Measure N-C would be required to reduce impacts related to long-term increases in traffic, area, and stationary source noise levels at nearby sensitive receptors to less than significant. The following provides a discussion of noise associated with construction and operation of the proposed project.

Construction Noise

The NQSP EIR's analysis of potential noise impacts associated with buildout of the NQSP area accounted for noise generated during construction activities. Implementation of the proposed project would generate noise during construction by the use of construction equipment. Table 4.8.2 in the NQSP EIR provides the typical construction operations that would be required to develop the NQSP area, and the estimated sound generated by such equipment from a distance of 50 feet. According to the NQSP EIR, noise levels for the construction operations in Table 4.8.2 would range from 78 to 89 decibels (dBA) at 50 feet. Based on the noise levels presented in the NQSP EIR, the NQSP EIR concluded that sensitive receptors are not located close enough to the NQSP area to be adversely impacted by short-term construction noise.

Nonetheless, the NQSP EIR included Mitigation Measure N-A, which requires all contractors to comply with local, State, and federal noise regulations, including fitting all equipment with mufflers, as well Mitigation Measure N-B, which requires construction activities to not take place between 7:00 PM and 7:00 AM on weekdays and Saturday or Sunday or holidays, to reduce impacts related to construction noise to a less-than-significant level. Though the project site similarly lack nearby sensitive receptors, the proposed project would be required to comply with Mitigation Measures N-A and N-B.

The proposed project would not cause any additional construction noise that would exceed what was already evaluated in the NQSP EIR. Therefore, additional noise control mitigation measures would not be required for construction noise, beyond those already outlined in the NQSP EIR, and proposed project would not result in any changes, new circumstances, or new information that would involve new significant impacts or substantially more severe significant impacts from what has been anticipated in the NQSP EIR.

Project Operational Noise

According to the NQSP EIR, operation of future development within the NQSP area would result in a potentially significant increase in traffic noise on local roadways. Implementation of Mitigation Measure N-C, which requires future development to comply with the City of Dixon's noise standards or provide site-specific mitigation measures to ensure that noise thresholds are not exceeded, would reduce impacts related to operational noise to a less-than-significant level.

As discussed in Section XVII, Transportation, of this Initial Study/Addendum, according to the VMT Assessment prepared for the proposed project by DKS Associates (see Appendix F),[28] the proposed project is estimated to generate 7,014 total daily trips. Buildout of the project site under currently approved conditions is estimated to generate 12,308 total daily trips. Because the proposed project would result in a reduction of approximately 5,294 total daily trips, operational traffic noise associated with the proposed project would significantly decrease as compared to what was anticipated for the site in the NQSP EIR. Nonetheless, the proposed project would still be subject to compliance with Mitigation Measure N-C.

With respect to operational stationary noise sources, the NQSP EIR does not specifically analyze this issue, presumably given the lack of sensitive receptors surrounding the Plan area. In terms of the current project site, there is a similar lack of sensitive receptors in the immediate vicinity. Thus, stationary noise sources associated with future on-site industrial development (e.g., loading docks, on-site truck circulation, parking lot noise) would not expose sensitive receptors to noise levels in excess of the City of Dixon's noise standards.

Based on the above, the currently proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the NQSP EIR. Therefore, the proposed project would be consistent with the conclusions of the NQSP EIR.

b. The NQSP EIR did not analyze the potential for buildout of the NQSP area to result in the generation of excessive groundborne vibration or groundborne noise levels. The currently proposed project would be constructed within the footprint of the previously analyzed highway commercial component of the NQSP. As such, operation of the future industrial uses within the project site would not cause any additional vibration impacts beyond what was already evaluated in the NQSP EIR. Therefore, additional vibration control mitigation measures would not be required, and the proposed project would not result in any changes, new circumstances, or new information that would involve new significant impacts or substantially more severe significant impacts from what has been anticipated for buildout of the NQSP in the NQSP EIR.

[28] DKS Associates. *Dixon Innovation Center VMT Assessment Draft R.2*. October 22, 2024.

Based on the above information, the currently proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the NQSP EIR. Therefore, the proposed project would be consistent with the conclusions of the NQSP EIR.

c. The NQSP EIR did not address potential impacts related to being located within an airport land use plan or being located within two miles of an airport. However, an airport was not located within two miles of the NQSP area at the time the NQSP EIR was certified; a new airport has not been constructed within two miles of the project site since the NQSP EIR was drafted. Thus, the currently proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the NQSP EIR. Therefore, the proposed project would be consistent with the conclusions of the NQSP EIR.

Prior Mitigation Measures

The following mitigation measure(s) from the NQSP EIR would apply to the proposed project:

- **Mitigation Measure N-A:** All contractors shall comply with local, state and federal noise regulations, including fitting all equipment with mufflers according to the manufacturer's specifications.
- **Mitigation Measure N-B:** Construction activities shall not take place between 7:00 p.m. and 7:00 a.m. on weekdays and Saturday, and shall not be permitted on Sunday or on federal holidays.
- **Mitigation Measure N-C:** Future development shall comply with the City of Dixon. Development criteria in the NQSP shall be required to demonstrate conformance with the City's noise standard or site specific mitigation measures to ensure that noise thresholds are not exceeded.

New Mitigation Measures

None Required.

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XIV. POPULATION AND HOUSING. *Would the project:*	Where Impact Was Analyzed in Previous CEQA Document(s)?	Do Proposed Changes Involve New or More Severe Impacts?	Any New Circumstances Involving New or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (e.g., through projects in an undeveloped area or extension of major infrastructure)?	N/A	No	No	No
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	Pg. 4-14	No	No	No

Discussion

a. Because residential development is not proposed in the NQSP area, the NQSP EIR did not specifically address impacts related to inducing substantial population growth in an area, either directly or indirectly. The proposed project would include a SPA to change the NQSP land use designation of the project site from Highway Commercial to General Industrial, and would not include any residential or commercial development. As such, although future development would be altered from what was anticipated for the site in the NQSP EIR, the potential population increase associated with new employment opportunities would be generally consistent with what was anticipated in the NQSP EIR. In addition, although the proposed project may include the development of off-site utilities infrastructure improvements, such utilities would be required to serve the commercial and industrial development anticipated in the NQSP EIR both on-site and in the project site vicinity. As such, the potential off-site utilities infrastructure improvements would not be considered to indirectly induce unplanned population growth. Therefore, the project would not directly or indirectly induce population growth.

Based on the above, the currently proposed project would not result in new significant impacts or substantially more severe significant impacts beyond what were analyzed in the NQSP EIR. Thus, the proposed project is consistent with the conclusions of the NQSP EIR.

b. According to the NQSP EIR, approval of the NQSP would result in the conversion of 11 residential parcels to a commercial or light industrial use. Because existing residences within the NQSP area are associated with existing agricultural uses and are not the predominant land use, and because relatively few people would be displaced by approval of the NQSP, the NQSP EIR concluded that impacts related to such would be less than significant.

The project site is currently undeveloped and does not include existing housing or other habitable structures. As such, the proposed project would not displace a substantial number of existing housing or people and would not necessitate the construction of replacement housing elsewhere. Therefore, the currently proposed project would not result in new significant impacts or substantially more severe significant impacts beyond what were analyzed in the NQSP EIR. Thus, the proposed project is consistent with the conclusions of the NQSP EIR.

Prior Mitigation Measures
None Required.

New Mitigation Measures
None Required.

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XV. PUBLIC SERVICES.

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	Where Impact Was Analyzed in Previous CEQA Document(s)?	Do Proposed Changes Involve New or More Severe Impacts?	Any New Circumstances Involving New or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
a. Fire protection?	Pgs. 4-121	No	No	No
b. Police protection?	to 4-125	No	No	No
c. Schools?	and 4-126	No	No	No
d. Parks?	to 4-127	No	No	No
e. Other Public Facilities?		No	No	No

Discussion

a,b. The NQSP EIR analyzed the potential for buildout of the NQSP area to result in an increased need for fire protection and police protection services and determined that due to the increased number of employees that would occur following buildout of the area, a potentially significant impact could occur. With respect to fire protection services, the NQSP EIR concluded that implementation of Mitigation Measures PS-I, PS-J, and PS-K, which require the payment for new fire protection facilities, the submission of a plan showing all fire hydrant locations, and the preparation of an emergency response plan, impacts related to fire protection would be reduced to a less-than-significant level. Similarly, the NQSP EIR concluded that implementation of Mitigation Measures PS-L and PS-M, which require project applicants to pay fair share fees for the provision of additional police protection facilities, and for project applicants to provide on-site private security staff to serve future projects, impacts related to the provision of police protection services would be less than significant.

The Dixon Fire Department (DFD) provides emergency fire, rescue, and medical services to the City and the Dixon Fire Protection District, a 320-square-mile area. The fire station is located at 205 Ford Way, approximately two miles south of the project site, and is manned by 21 career and 10 volunteer/reserve personnel. A new fire station, Fire Station 82, is planned to be constructed at the corner of Pitt School Road and Lavender Lane, which would respond to service calls in the southern and western portions of the city. The addition of Station 82 to the City Fire Department would then allow trucks and personnel from the existing fire station to respond more rapidly to service calls in the northern and eastern portions of the City, including the NEQSP area.

The General Plan EIR concluded that the City's fire protection infrastructure maintains acceptable service ratios, response times, and other performative objectives related to fire protection. Based on the relatively short distance between the fire station and project site, the DFD would be able to respond to service calls from the project site within an acceptable time frame. Furthermore, individual development projects, including the proposed project, would be subject to Fire Department review and approval and would be required to pay the City's standard public safety impact fees (Policies PSF.1-5 and PSF.1-.6). Revenues generated through impact fees on new development would pay for any new

fire facilities deemed necessary by the City, all of which would be required to undergo analysis of all potential environmental impacts under CEQA. As such, Mitigation Measures PS-I, PS-J, and PS-K would not be applicable to the proposed project.

The Dixon Police Department (DPD) provides law enforcement service within the City limits and is based at 201 West A Street, approximately three miles south of the project site. The DPD is manned by 28 sworn police officers, two administrative staff, and three community service officers, and maintains 21 police vehicles, one K9 unit, two police motorcycles, an off-road utility vehicle and two distinctively marked police vehicles for community service officers. The DPD strives to have a response time of less than five minutes to Priority 1 calls, which typically relate to incidents involving an immediate threat to life, danger of serious physical injury, or danger of major property damage. Given the short distance from the police station to the project site, the DPD would be able to respond to service calls from the project site within the five-minute response time. In addition, Section 4.07.060 of the Municipal Code establishes police facilities impact fees for development within the City, which must be paid as part of the issuance of a building permit. The proposed project would be subject to all applicable impact fees. Revenues generated through impact fees on new development would pay for any new police facilities deemed necessary by the City, all of which would be required to undergo analysis of all potential environmental impacts under CEQA. As such, Mitigation Measures PS-L and PS-M would not apply to the proposed project.

Based on the above, the currently proposed project would not result in new significant impacts or substantially more severe significant impacts beyond what were analyzed in the NQSP EIR related to the need for new or physically altered fire protection facilities or police protection facilities, the construction of which could cause significant environmental impacts. Therefore, the proposed project is consistent with the conclusions of the NQSP EIR.

c-e. According to the NQSP EIR, although development of the NQSP area would not include residential uses and, thus, would not directly increase student enrollment at any existing educational facilities, the anticipated commercial and industrial uses would indirectly impact the capacity of educational facilities and should contribute to its fair share to fund such facilities. As such, the NQSP EIR concluded that implementation of Mitigation Measure MS-N, which requires payment of developer fees, would reduce impacts related to school facilities to a less-than-significant level. The NQSP EIR concluded that construction of the anticipated commercial and industrial uses would not significantly increase the need for additional public parks and recreational facilities, and impacts related to such would be less than significant.

Future development of the project site would be industrial in nature, and, therefore, would not include any development that would result in direct population growth such that demand for schools, parks, or other public facilities would increase. The nearest park to the project site is Conejo Park, located approximately two miles southwest of the project site. The proposed project would not bring school-age children to the area; thus, an impact to schools would not occur with implementation of the proposed project. Nonetheless, the project would be subject to payment of School Impact Mitigation Development Fees to fund local school services. Pursuant to the Dixon Unified School District (DUSD) Developer Fee Justification Study, the proposed project would be required to pay $0.78 per square foot for new industrial construction.[29] Proposition 1A/SB 50 prohibits local

[29] Dixon Unified School District Board of Education. *Developer Fee Justification Study, 2022*. June 2022.

agencies from using the inadequacy of school facilities as a basis for denying or conditioning approvals of any "[...] legislative or adjudicative act...involving ...the planning, use, or development of real property" (Government Code 65996(b)). Satisfaction of the Proposition 1A/SB 50 statutory requirements by a developer is deemed to be "full and complete mitigation." Therefore, Mitigation Measure MS-N would not apply to the currently proposed project.

Furthermore, the project would be subject to payment of the City's park facility fee in accordance with Section 4.07.040 of the City's Municipal Code. Therefore, the proposed project would have a less-than-significant impact related to the need for new or physically altered schools, parks, or other public facilities, the construction of which could cause significant environmental impacts.

Based on the above, the currently proposed project would not result in new significant impacts or substantially more severe significant impacts beyond what were analyzed in the NQSP EIR related to the need for new or physically altered fire protection facilities or police protection facilities, the construction of which could cause significant environmental impacts. Therefore, the proposed project is consistent with the conclusions of the NQSP EIR.

Prior Mitigation Measures
None Required.

New Mitigation Measures
None Required.

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XVI. RECREATION. *Would the project:*	Where Impact Was Analyzed in Previous CEQA Document(s)?	Do Proposed Changes Involve New or More Severe Impacts?	Any New Circumstances Involving New or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	Pgs. 4-126 to 4-127	No	No	No
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	Pgs. 4-126 to 4-127	No	No	No

Discussion

a,b. The NQSP EIR concluded that construction of the anticipated commercial and industrial uses would not significantly increase the need for additional public parks and recreational facilities, and impacts related to such would be less than significant.

As discussed previously, future development of the project site would be industrial in nature, and, therefore, would not include any development that would result in an increase in the use of existing parks. The nearest park to the project site is Conejo Park, located approximately two miles southwest of the project site. Furthermore, the project would be subject to payment of the City's park facility fee in accordance with Section 4.07.040 of the City's Municipal Code. Therefore, the proposed project would not result in new significant impacts or substantially more severe significant impacts beyond what were analyzed in the NQSP EIR. Thus, the proposed project is consistent with the conclusions of the NQSP EIR.

Prior Mitigation Measures

None Required.

New Mitigation Measures

None Required.

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XVII. TRANSPORTATION. *Would the project:*	Where Impact Was Analyzed in Previous CEQA Document(s)?	Do Proposed Changes Involve New or More Severe Impacts?	Any New Circumstances Involving New or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
a. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	Pgs. 4-85 and 4-94 to 4-95	No	No	No
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	N/A	No	No	Yes
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	N/A	No	No	No
d. Result in inadequate emergency access?	N/A	No	No	No

Discussion

a. The Draft EIR for Northeast Quadrant Specific Plan was released prior to 2020 when the CEQA Guidelines were updated to shift the analysis for transportation impacts from Level of Service (LOS) to Vehicle Miles Traveled (VMT). Prior case law in California has uniformly concluded that projects subject to supplemental review under CEQA did not need to address new subject matter, even though the prior EIR being updated did not address the new subject matter (greenhouse gases for these cases). (Reference *Citizens for Responsible Equitable Environmental Development v. City of San Diego* (2011) 196 Cal.App.4th 525, 530-532; *Citizens Against Airport Pollution v. City of San Jose* (2014) 227 Cal.App4th 788, 806-808; see also CEQA Guidelines Section 15007(b)(c).) This case law can apply to VMT analysis as the CEQA Guidelines expressly states that it (VMT analysis) "shall apply prospectively as described in Section 15007." If a document meets the requirements in effect at the time of public review, the document does not need to conform to any new content. Therefore, there is no requirement to conduct VMT analysis for the modified project as the Final EIR was released well before VMT was adopted as a metric for analysis requirements.

Please refer to Question 'b' for further discussion of VMT.

Transit, Bicycle, and Pedestrian Facilities

The NQSP EIR concluded that because the area was not served by transit facilities at the time the EIR was published, no impact would occur related to such. Similarly, the NQSP EIR concluded that with implementation of Mitigation Measure T-I, which requires roadway improvements to be designed to ensure safe and efficient movement of bicyclists and pedestrians, as well as Mitigation Measure T-J, which requires buildout of the NQSP area to include a bikeway and pedestrian trail system for public use, potential impacts related to such would be less than significant.

Consistent with the analysis in the NQSP EIR, the project site is not currently served by public transit, and bicycle and pedestrian facilities do not exist in the project site vicinity. Due to the industrial nature of future development associated with the proposed project, as well as the potential off-site utilities infrastructure improvements, the proposed project

is unlikely to generate new pedestrian and bicycle trips to the project site. In fact, the proposed project would generate fewer pedestrian and bicycle trips than the commercial uses anticipated for the site in the NQSP EIR; it is reasonably anticipated that the proposed industrial uses would only generate employee trips, rather than potential customer trips. Nonetheless, the proposed project would still be subject to compliance with Mitigation Measures T-I and T-J from the NQSP EIR.

Conclusion

Based on the above, the currently proposed project would not result in new significant impacts or substantially more severe significant impacts beyond what were analyzed in the NQSP EIR. Thus, the proposed project is consistent with the conclusions of the NQSP EIR.

b. As noted above, there is no requirement to conduct VMT analysis for the modified project as the Final EIR was released well before VMT was adopted as a metric for analysis requirements. Nevertheless, for informational purposes, DKS Associates prepared a VMT Assessment for the proposed project (see Appendix F).[30] The VMT Assessment was prepared consistent with the City of Dixon's Transportation Impact Analysis Guidelines (TIA Guidelines) and utilized the City of Dixon traffic model.

The analysis compares two scenarios given that the proposed project is being reviewed pursuant to CEQA's subsequent revisions provisions: the "Approved Conditions" would consist of buildout of the project site with 377,000 sf of Highway Commercial uses, consistent with the site's existing NQSP land use designation. The Approved Conditions is estimated to generate 600 retail jobs. The "Proposed Project" would consist of the proposed General Industrial uses, and would generate an estimated 2,080 office-service jobs. The Proposed Project scenario also assumes full buildout of the project site with the proposed industrial uses by 2025, as well as the widening of southbound Pedrick Road to two lanes and the construction of Professional Drive along the project site frontage.

In addition, while The Campus (Dixon 257) Project is still being reviewed by the City of Dixon, the VMT Assessment considered its effects on VMT in the area for informational purposes.

Table 4 below presents the total daily VMT for each of the aforementioned scenarios.

Table 4
VMT Comparison

Scenario	Total Daily VMT
Approved Conditions (Without The Campus/Dixon 257 Project)	139,003
Approved Conditions (With The Campus/Dixon 257 Project)	125,415
Proposed Project (Without The Campus/Dixon 257 Project)	119,962
Proposed Project (With The Campus/Dixon 257 Project)	108,161

Source: DKS Associates, October 2024 (see Appendix F).

[30] DKS Associates. *Dixon Innovation Center VMT Assessment Draft R.2.* October 22, 2024.

As shown in Table 4, , the Proposed Project scenario would result in less total daily VMT than the Approved Conditions scenario, both with and without consideration of The Campus (Dixon 257) Project. VMT does not constitute a new significant impact or significant new information under CEQA, for reasons stated above, but for informational purposes, as shown in Table 4, the modified project is expected to result in lower overall VMT upon buildout.

Based on the above, the currently proposed project would not result in new significant impacts or substantially more severe significant impacts beyond what were analyzed in the NQSP EIR.

c,d. The NQSP EIR does not explicitly address potential impacts related to the potential to substantially increase hazards due to a design feature or incompatible use or to result in inadequate emergency access.

Although site plans are not currently available for the proposed project, as stated above, the project would include the widening of southbound Pedrick Road to two lanes and the construction of Professional Drive along the project site frontage. The proposed roadway improvements, as well as all development related to site entrances and exits, would be required to conform with applicable design standards and requirements contained in the Municipal Code and the City's Engineering Design Standards. Compliance with such would ensure that the proposed project would not substantially increase hazards due to design features or incompatible uses, and emergency access to the site would be adequate.

Based on the above, the currently proposed project would not result in new significant impacts or substantially more severe significant impacts beyond what were analyzed in the NQSP EIR. Thus, the proposed project is consistent with the conclusions of the NQSP EIR.

Prior Mitigation Measures

The following mitigation measure(s) from the NQSP EIR would apply to the proposed project:

- **Mitigation Measure T-I:** Ensure Safety in the Design of Road Improvements. Design and implementation of roadway improvements shall ensure safe and efficient movement of bicyclists and pedestrians, including sidewalk paths, bicycle lanes and signalized crosswalks at major intersections, in accordance with City standards.
- **Mitigation Measure T-J:** Implementation of the project includes a bikeway and pedestrian trail system for public use.

New Mitigation Measures

None Required.

XVIII. TRIBAL CULTURAL RESOURCES. *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:*	Where Impact Was Analyzed in Previous CEQA Document(s)?	Do Proposed Changes Involve New or More Severe Impacts?	Any New Circumstances Involving New or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k).	N/A	No	No	No
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	N/A	No	No	No

Discussion

a,b. Because Appendix G of the CEQA Guidelines did not previously include a specific section on tribal cultural resources, the NQSP EIR did not include a specific analysis of potential tribal cultural resource related impacts. However, as discussed in Section V, Cultural Resources, of this Initial Study/Addendum, the NQSP EIR addressed the potential for buildout of the NQSP area to result in impacts to known and unknown cultural resources. As discussed therein, with implementation of Mitigation Measure C-A from the NQSP EIR, as well as Mitigation Measures V-1 through V-3, the currently proposed project would not result in significant impacts related to cultural resources.

Assembly Bill (AB) 52, passed in 2014, requires environmental review documents to disclose and analyze potential significant impacts to tribal cultural resources, including sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe. Lead agencies are also required to begin consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of the proposed park project if the tribes request to the lead agency, in writing, to be informed by the lead agency of proposed park projects in that geographic area and the tribes request consultation, prior to determining whether a negative declaration, mitigated negative declaration, or EIR is required for a project. AB 52 specifically applies to projects that have a Notice of Preparation or a Notice of Intent to adopt a negative declaration or mitigated negative declaration filed on or after July 1, 2015.

The NQSP EIR was certified prior to implementation of AB 52. Therefore, AB 52 is not applicable to the proposed project.

As discussed previously, should The Campus (Dixon 257) Project not be approved, or said project is approved but its associated off-site infrastructure will not be installed in sufficient time for the proposed project to proceed, the proposed project be required to complete off-site utilities infrastructure improvements. As part of The Campus (Dixon 257) CRA, HELIX notified the Cachil Dehe Band of Wintun Indians of the Colusa Indian Community, Confederated Villages of Lisjan, and Cortina Rancheria-Kletsel Dehe Band of Wintun Indians of the proposed Dixon 257 Project, with which the potential off-site utilities infrastructure improvements would overlap. The Yocha Dehe Wintun Nation responded on August 3, 2023, recommending that the City include cultural monitors during development and ground disturbance, cultural sensitivity training for any pre-project personnel, and to incorporate Yocha Dehe Wintun Nation's Treatment Protocol into the mitigation measures for The Campus (Dixon 257) Project.

The tribal cultural resources section of The Campus Project EIR requires implementation of Mitigation Measures 3.5-1(a), 3.5-1(b), 3.5-2, 3.5-3, and 3.5-4(b) to reduce potential impacts to tribal cultural resources to a less-than-significant level. With the exception of Mitigation Measure 3.5-4(b), the previously stated measures are already required in Section V of the Initial Study/Addendum. Therefore, Mitigation Measure 3.5-4(b) of The Campus Project EIR has been incorporated herein as new Mitigation Measure XVIII-1.

Based on the above, the currently proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the NQSP EIR. As a result, the proposed project would remain consistent with the conclusions of the NQSP EIR.

Prior Mitigation Measures

None Required.

New Mitigation Measures

The following mitigation measure(s) from The Campus Project DEIR would be required to reduce impacts to tribal cultural resources to a less-than-significant level:

- **Mitigation Measure XVIII-1 (Mitigation Measure 3.5-4(b) from The Campus Project DEIR):** The project proponent shall implement the following measure to avoid or minimize impacts on potential tribal cultural resources only if the project constructs the off-site infrastructure improvements in lieu of these improvements being completed by other parties:

  A tribal cultural resources awareness brochure and training program for all personnel involved in ground-disturbing activities (site grading, utility infrastructure installation, construction, etc.) associated with the potential off-site utilities infrastructure improvements shall be developed in coordination with interested Native American Tribes. The brochure shall be distributed and the training will be conducted by Native American representatives, or tribal monitors from culturally affiliated Native American Tribes, before any stages of project implementation and construction activities begin. The training may be done in coordination with the project archaeologist. The program will include relevant information regarding sensitive tribal cultural resources, applicable regulations and

protocols for avoidance, and consequences of violating state laws and regulations. The program will describe appropriate avoidance and minimization measures for resources that have the potential to be located on the disturbance footprint of the potential off-site utilities infrastructure improvements and will outline what to do and whom to contact if any potential tribal cultural resources or archaeological resources are encountered. The program will underscore the requirement for confidentiality and culturally appropriate treatment of any find with cultural significance to Native Americans' tribal values. All operators of ground-disturbing equipment shall receive the training and sign a form that acknowledges receipt of the training.

XIX. UTILITIES AND SERVICE SYSTEMS. *Would the project:*	Where Impact Was Analyzed in Previous CEQA Document(s)?	Do Proposed Changes Involve New or More Severe Impacts?	Any New Circumstances Involving New or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	Pgs. 4-112, 4-115, 4-125, and 4-126	No	No	No
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	Pgs. 4-112 to 4-114	No	No	No
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Pgs. 4-115 to 4-118	No	No	No
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	Pg. 4-120	No	No	No
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	Pg. 4-120	No	No	No

Discussion

a-c. The NQSP EIR assessed the potential for buildout of the NQSP area to result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects, and concluded that, with implementation of mitigation, impacts would be less than significant.

Brief discussions of the water, wastewater, stormwater drainage, electrical, natural gas, and telecommunications facilities that would serve the proposed project are included below.

Water

The NQSP EIR anticipated that buildout of the NQSP area would require new water utilities infrastructure and would result in an increase in water demand. The NQSP EIR concluded that implementation of Mitigation Measure PS-B, which required project proponents to obtain evidence that a water supply is available to meet minimum demand, would reduce the impact to a less-than-significant level.

As discussed previously, if The Campus (Dixon 257) Project is not approved, or said project is approved but its associated off-site water infrastructure will not be installed in sufficient time for the proposed project to proceed, a 1,500-gpm municipal well would be constructed south of the project site as part of the proposed project. In addition, a 12-inch water main would be extended south from the project site to connect to the existing 10-

inch water main within Vaughn Road. If The Campus (Dixon 257) Project is approved prior to the approval of the proposed project, the foregoing utilities improvements would be developed as part of The Campus (Dixon 257) Project, and the currently proposed project would only require connections to the new off-site utilities connections.

A Supplemental Water Capacity Analysis was prepared for the proposed project by Morton & Pitalo, Inc. (M&P) (see Appendix G)[31] to assess if adequate water supply is available to serve the project. According to the Water Analysis, the average annual water demand for the project would be 57 acre-feet per year; maximum day demand and peak hour demand were estimated to be 0.112 and 0.168 million gallons per day, respectively. The 1,500-gpm municipal well proposed for development south of the project site would not only adequately meet the demand of the proposed project, but would be capable of serving other future development in the NQSP area, including The Campus (Dixon 257) Project. In addition, the City of Dixon General Plan EIR determined that even in dry and multiple dry years, the Solano Groundwater Subbasin levels have been relatively stable. Since the construction of the Solano Project and the Monticello Dam in the 1950s, groundwater levels have remained consistent throughout the County, with major land subsidence not detected, and well levels dropping and rising seasonally, even during the multi-year drought from 2011 to 2017. According to the General Plan EIR, the relative stability of the subbasin levels indicates that even in dry and multiple dry years, the City is likely to have adequate water supply. As such, Mitigation Measure PS-B would not be required for the proposed project.

Wastewater

The NQSP EIR determined that although buildout of the NQSP area would increase demand for and require the development of additional wastewater infrastructure, implementation of Mitigation Measures PS-C, PS-D, and PS-E would reduce impacts related to such to a less-than-significant level. Mitigation Measure PS-C requires project proponents to present evidence that the City's wastewater treatment plant has capacity to serve the project, and Mitigation Measure PS-E requires the project applicant to pay hook-up fees to offset costs of necessary sewage treatment facility expansions; Mitigation Measure PS-D requires annexation of 60 acres into the City's sewer service area, which has already occurred.

The proposed project would include the development of a sanitary sewer lift station in the southwest corner of the project site. If The Campus (Dixon 257) Project is not approved, or said project is approved but its associated off-site sewer infrastructure will not be installed in sufficient time for the proposed project to proceed, the proposed project would also require extension of an off-site sanitary sewer pipe to the south to connection to the existing sanitary sewer main within Vaughn Road. The proposed sewer infrastructure would serve the project site as well as the surrounding parcels to the north, west, and south of the project site. As such, the required sewer infrastructure improvements would include the installation of an eight-inch sewer line originating from north of the project site, north of I-80, and would extend south within Pedrick Road before branching west into a 10-inch sewer line within the future Professional Drive, which would run along the site's southern boundary, before discharging into the aforementioned lift station. From the lift station, the sewer line would vary in size and gravity to the existing 18-inch sewer line within Vaughn Road. According to the Supplemental Sewer Capacity Analysis prepared

[31] Morton & Pitalo, Inc. *Supplemental Water Capacity Analysis*. February 2024.

for the proposed project by M&P (see Appendix H),[32] the proposed sewer utilities infrastructure improvements would be adequately sized to serve the project site and the surrounding area.

The 18-inch sewer line within Vaughn Road leads to the City-owned and operated sewer system and wastewater treatment facility (WWTF). In 2016, Dixon completed an upgrade to its wastewater treatment facility (WWTF), replacing 130-acre treatment ponds with an oxidation ditch design. The upgrade implemented an activated sludge treatment process that required much less land than the original aerated pond process. Phase 1 of the WWTF upgrade increased the Average Annual Flow (AAF) capacity of the WWTF to 1.9 million gallons per day (MGD) and was constructed on four acres in a 14-acre site at the north edge of the original WWTF, which covered 430 acres. The Phase 1 upgrade/expansion was designed so that the WWTF can be further expanded to an AAF capacity of 2.5 MGD. As of 2014, the flows to the WWTF were approximately 1.2 MGD (City of Dixon, 2014).

The City collects wastewater rates and impact fees to fund the operation, maintenance, and expansion of the collection system and WWTF, ensuring the financial capacity to make any necessary improvements in full compliance with any applicable regulations. Section 4.07.100 of the City's Municipal Code established such fees. As such, Mitigation Measure PS-E would not be required for the proposed project. However, Mitigation Measure PS-C would still be required for the proposed project to ensure that the WWTF has capacity to serve the proposed project.

Stormwater

The NQSP EIR did not specifically address potential impacts related to the development of stormwater infrastructure. Issues related to stormwater infrastructure are discussed in Section X, Hydrology and Water Quality, of this Initial Study/Addendum. As noted therein, according to the Drainage Study prepared for the proposed project, if The Campus (Dixon 257) project is not approved, or said project is approved but The Campus (Dixon 257) stormwater basin is not constructed in sufficient time such that the proposed project can proceed, the proposed project would construct an on-site retention basin that would be adequately sized to accommodate stormwater flows during the 100-year storm event, and increases in peak flow and water surface elevations would not occur upstream or downstream of the project site.

Electricity, Natural Gas, and Telecommunications

The NQSP EIR determined that future development would be able to connect to existing PG&E infrastructure in the vicinity for electricity and natural gas, and that telecommunications facilities would be provided by Pacific Bell. Therefore, the NQSP EIR concluded that a less than significant impact would occur. Consistent with the conclusions of the NQSP EIR, electricity and natural gas would be provided by PG&E by way of existing electrical and natural gas infrastructure in the project vicinity. Internet and telephone services would be provided by AT&T or a similar service provider operating within the City. The project would not require major upgrades to, or extension of, existing infrastructure. Thus, impacts to electricity, natural gas, and telecommunications infrastructure would be less than significant.

[32] Morton & Pitalo, Inc. *Supplemental Sewer Capacity Analysis*. February 2024.

Conclusion

As discussed above, if The Campus (Dixon 257) Project is approved prior to the approval of the proposed project, the relocation or construction of new or expanded utilities infrastructure would not occur, as the proposed project would only connect to the new utilities infrastructure developed as part of The Campus (Dixon 257) Project. Nevertheless, the potential environmental impacts of the aforementioned off-site utilities infrastructure improvements that would be required are addressed throughout this Initial Study/Addendum by incorporating by reference the analysis and applicable mitigation measures from The Campus Project DEIR. As such, additional environmental impacts would not occur beyond what has been anticipated in this Initial Study/Addendum. In addition, sufficient water supplies would be available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years, and, with implementation of NQSP EIR mitigation, adequate capacity to serve the project's projected wastewater services demand in addition to the City's existing commitments.

Based on the above, the currently proposed project would not result in new significant impacts or substantially more severe significant impacts beyond what were analyzed in the NQSP EIR. Thus, the proposed project is consistent with the conclusions of the NQSP EIR.

d,e. Although the NQSP EIR did not analyze compliance with federal, State, and local statutes and regulations related to solid waste, the NQSP EIR concluded that with implementation of Mitigation Measures PS-F, PS-G and PS-H, impacts related to having adequate landfill capacity to serve buildout of the NQSP area would be less than significant. The aforementioned mitigation measures generally require the NQSP to include waste management plans, to include an on-site recycling center, and for organic waste to be made available for composting or recycling.

Solid waste disposal services are provided in the City of Dixon by Recology Dixon, a private company under contract with the City. Recology Dixon provides weekly curbside collection of garbage, recycling, and yard waste, and operates the Dixon Recycle Center, located in the City. Household hazardous waste disposal services are provided by Recology Dixon at the Household Hazardous Waste Facility in the City of Vacaville. Solid waste collected in the Planning Area is transported to the Hay Road Landfill located eight miles south of the City, operated by Recology. The landfill has a permitted capacity of 2,400 tons per day, with an estimated total permitted capacity of 34,697,000 cubic yards. The total estimated capacity used, as of April 2013, was 6,559,000 cubic yards (18.9 percent of total permitted capacity). The estimated closure date of the currently permitted facility is 2068. In 2018, Recology released a Notice of Preparation stating an intent to expand the Hay Road Landfill by 8,800,000 cubic yards and extend the estimated life of the landfill by approximately nine years. As such, adequate capacity would be available at the Hay Road Landfill to accept solid waste generated by the proposed project.

The proposed project would be required to comply with all applicable policies and regulations regarding solid waste. The City of Dixon General Plan contains numerous policies aimed at reduction and diversion from landfills of solid waste including by providing recycling receptacles throughout Dixon, requiring development of a construction waste diversion ordinance, increasing public education around waste reduction and diversion, and facilitating citywide goods donation and garage sale events. All new development must also comply with the CALGreen Code, which requires diversion of at least 65 percent of construction waste from landfills. Because the requirements of the

CALGreen Code have become more stringent since the NQSP EIR was certified, development of the proposed project would result in the generation of less waste than was anticipated in the NQSP EIR.

Based on the above, the currently proposed project would not result in new significant impacts or substantially more severe significant impacts beyond what were analyzed in the NQSP EIR, and the proposed project is consistent with the conclusions of the NQSP EIR.

Prior Mitigation Measures

The following mitigation measure(s) from the NQSP EIR would apply to the proposed project:

- **Mitigation Measure PS-C:** Prior to the issuance of a building permit, evidence that the city's wastewater treatment plant has capacity to accommodate the proposed project shall be submitted to the City of Dixon.

New Mitigation Measures

None Required.

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XX. WILDFIRE. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:*	Where Impact Was Analyzed in Previous CEQA Document(s)?	Do Proposed Changes Involve New or More Severe Impacts?	Any New Circumstances Involving New or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	N/A	No	No	No
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	N/A	No	No	No
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	N/A	No	No	No
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	N/A	No	No	No

Discussion

a-d. Wildfire is an environmental issue area included in CEQA Guidelines Appendix G, subsequent to the approval of the NQSP EIR. As such, the NQSP EIR did not include an analysis specifically dedicated to wildfire. According to the CAL FIRE Fire and Resource Assessment Program, the project site is located within a LRA – Incorporated.[33] CAL FIRE has determined that the County does not contain VHFH Severity Zones in LRAs. Furthermore, future development within the project site would be required by law to incorporate California Building Code and California Fire Code requirements into all development phases. Fire reduction measures include fire sprinklers, fire resistant coatings, construction and maintenance of fuel breaks, management of fire-prone vegetation along streets, maintenance of clearances around structures, providing minimum street widths and turning radii, limiting the lengths of cul-de-sacs and dead-end streets, limiting excessive street grades, and requiring at least two access roads in and out of developed areas. The project site is not located on a substantial slope, and the project area does not include any existing features that would substantially increase fire risk. As discussed in Section VII, Geology and Soils, and Section X, Hydrology and Water Quality, of this Initial Study/Addendum, development of the proposed project would not expose people or structures to significant risks related to flooding or landslides.

Compliance with California Building Code regulations, California Fire Code requirements, and other state and local fire safety requirements would minimize wildland fire risks at the project site, and a less-than-significant impact would occur.

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[33] California Department of Forestry and Fire Protection. *Solano County: Fire Hazard Severity Zones In SRA*. Available at: https://cdnverify.osfm.fire.ca.gov/media/5wwjs5hp/fhsz_county_sra_11x17_2022_solano_ada.pdf. Accessed October 2024.

Based on the above information, the currently proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the NQSP EIR. Therefore, the proposed project would be consistent with the conclusions of the NQSP EIR.

Prior Mitigation Measures
None Required.

New Mitigation Measures
None Required.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE.	Where Impact Was Analyzed in Previous CEQA Document(s)?	Do Proposed Changes Involve New or More Severe Impacts?	Any New Circumstances Involving New or More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	N/A	No	No	No
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	N/A	No	No	No
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	N/A	No	No	No

Discussion

a. As discussed in Section IV, Biological Resources, of this Initial Study/Addendum, the agricultural lands within the project site lack the necessary habitat constituents for special-status plant species and, thus, the proposed project would not result in impacts to such. Through preconstruction and protocol-level surveys and any additional protective measures specified by Mitigation Measures B-D and IV-1 through IV-3, all potential adverse effects to special-status wildlife species would be minimized. Additionally, because the project site could contain unidentified historic or prehistoric resources beneath the ground surface, the proposed project would be implemented in accordance with Mitigation Measures C-A and V-1 through V-3, and impacts related to unidentified historic or precontact resources within the project site would be minimized during construction activities, consistent with the requirements of CEQA.

Considering the above, the proposed project would not: 1) degrade the quality of the environment; 2) substantially reduce or impact the habitat of fish or wildlife species; 3) cause fish or wildlife populations to drop below self-sustaining levels; 4) threaten to eliminate a plant or animal community; 5) reduce the number or restrict the range of a rare or endangered plant or animal; or 6) eliminate important examples of the major periods of California history or prehistory. Impacts associated with such resources have been adequately addressed and would not change from what was identified in the NQSP EIR, and the criteria for requiring further CEQA review are not met.

b. The NQSP EIR concluded that cumulative impacts to land use and air quality would be significant and unavoidable. For those impacts determined to be significant in an EIR, CEQA Section 15162 allows for future environmental documents to limit examination of environmental effects to substantial changes in a proposed project that would require major revisions of the previous EIR to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. Although not specifically anticipated in the NQSP EIR, as analyzed throughout this Initial Study/Addendum, the proposed project would not result in new significant impacts or substantially more severe significant impacts than what were previously analyzed in the NQSP EIR, and further analysis is not required in this Initial Study/Addendum.

c. As described in this Initial Study/Addendum, the proposed project would not cause substantial effects to human beings, including effects related to exposure to air pollutants, geologic hazards, hazardous materials, and excessive noise, beyond those effects previously analyzed as part of the NQSP EIR. Therefore, further analysis is not required.

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