Final Environmental Impact Report

FLYING J TRAVEL PLAZA

Prepared for:

City of Dixon
600 East A Street
Dixon, California 95620

Prepared by:

IMPACT SCIENCES
2101 Webster Street, Suite 1825
Oakland, California 94612
(510) 267-0494

March 2008

Flying J Travel Plaza

Final Environmental Impact Report

State Clearinghouse No. 1999082090

Prepared for:

City of Dixon
600 East A Street
Dixon, California 95620
(707) 678-7004

Prepared by:

Impact Sciences, Inc.
2101 Webster Street, Suite 1825
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(510) 267-0494

March 2008

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1.0 INTRODUCTION

This document, together with the *Flying J Travel Plaza Draft Environmental Impact Report* (Draft EIR or DEIR), constitutes the Flying J Travel Plaza Final Environmental Impact Report (Final EIR or FEIR). Pursuant to Section 15132 of the *CEQA Guidelines*, this Final EIR consists of (a) a list of persons, organizations, and public agencies commenting on the Draft EIR; (b) comments and recommendations received on the Draft EIR, and (c) responses of the Lead Agency (City of Dixon) to significant environmental points raised in the review and consultation process; (d) revisions to the Draft EIR; and (e) the Mitigation Monitoring and Reporting Program (MMRP). The Final EIR will be used for review and consideration for certification by the City of Dixon.

This Introduction chapter provides a summary of EIR certification and project approval procedures, public involvement, the requirements for consideration of recirculation, and an overview of the response to comment process. The remainder of the Final EIR document is comprised of the following chapters:

- Chapter 2.0: List of Agencies, Organizations, and Individuals Receiving the Draft EIR;
- Chapter 3.0: Response to Comments and Copies of Comment Letters;
- Chapter 4.0: Revisions to the Draft EIR; and
- Chapter 5.0: Mitigation Monitoring and Reporting Program.

1.1 EIR Certification - Project Approval Process

The Final EIR will be considered by the City in a public meeting. Prior to approving the project, the City must certify that (1) the Final EIR has been completed in compliance with CEQA; (2) the City has reviewed and considered the information in the Final EIR; and (3) the Final EIR reflects the City's independent judgment and analysis (*CEQA Guidelines*, Section 15090).

Once the Final EIR is certified, the City will consider the project for approval. As part of the approval process, the City will make written findings for each potentially significant impact identified for the proposed project. The findings will indicate that feasible mitigation measures have been incorporated into the project that will avoid or substantially reduce the potentially significant

environmental effects identified in the Final EIR. The findings will also address alternatives considered by the City to avoid or reduce any potentially significant impacts identified for the proposed project.

CEQA requires that when a public agency makes findings based on an EIR, the public agency must adopt a reporting or monitoring program for those mitigation measures that it has adopted or made a condition of project approval in order to mitigate or avoid significant environmental effects. The City has prepared a Mitigation Monitoring and Reporting Program for the proposed project which is presented in **Section 5.0** of this document.

Once the Final EIR is certified, it may be used by responsible agencies in deciding which conditions to approve for the project entitlements.

1.2 Public Involvement

The City released the Draft EIR for public review and comment on August 31, 2006. The Draft EIR was distributed to agencies, local governments, and interested parties. Printed copies of the Draft EIR and appendices were available to the public at City Hall. The comment period closed on October 16, 2006.

1.3 Requirements For Recirculation

If significant new information is added to an EIR after the public review, the lead agency is required to recirculate the EIR or a portion of it for additional public review and comments. (*CEQA Guidelines*, Section 15088.5.) "[N]ew information to an EIR is not significant unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment on a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible projected alternative) that the project's proponents have declined to implement…[R]ecirculation is not required where the new information added to the EIR merely clarifies or amplifies…or makes insignificant modification in…an adequate EIR" (Laurel Heights Improvement Association of San Francisco., Inc. v. Regents of the University of California (1993) 6 Cal. 4th 1112,1129–1130). Significant new information requiring recirculation may include, for example, a disclosure showing that:

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

During the preparation of the Draft EIR, the City was considering the development of the Dixon Downs Horse Racetrack and Entertainment Center project (Dixon Downs project) adjacent to the Flying J Travel Plaza project site. The cumulative analyses for traffic, visual, and utilities; and the description of off-site infrastructure improvements presented in the *Flying J Travel Plaza Draft EIR* assumed the development and operation of the Dixon Downs project. Since the publication of the *Flying J Travel Plaza Draft EIR*, City residents voted down the proposed Dixon Downs project in a special referendum vote.

All references to the Dixon Down project have been removed from the Draft EIR and the cumulative analyses for traffic, visual, and utilities have been re-evaluated using buildout of the Northeast Quadrant Specific Plan (NQSP). An evaluation comparing the Dixon Downs project to the designated land uses by NQSP concludes that the Dixon Downs project is a higher intensity land use than land uses that would be allowed by the NQSP. Given this, the evaluation in the Draft EIR is a "worst case" scenario, and the removal of the Dixon Downs project would result in a lesser impact than those identified in the Draft EIR. A description of this evaluation and conclusion is presented in **Chapter 4.0** of this document. As shown in the information provided in **Chapter 4.0,** the removal of the Dixon Downs project from the Draft EIR does not increase the severity of an impact nor does it result in a new significant impact. There are no impacts described as less than significant, in the Draft EIR, that have been reevaluated in the Final EIR as significant and unavoidable as a result of revisions and new information. Also, no substantial increase in the severity of impacts has been identified as a result of information presented in comments on the Draft EIR

(*CEQA Guidelines*, Section 15088.). In light of the above, the City has determined that recirculation of the Draft EIR is not required.

1.4 Responses To Comments

Pursuant to CEQA, the Lead Agency must respond to all significant environmental issues raised in comments on the Draft EIR. Responses to all written comments received within and shortly after the close of the comment period are contained in this Final EIR. Possible responses include clarification of mitigation measures, supplementing analyses, making factual corrections, and explaining why certain comments do not warrant further agency response. A small number of factual corrections have been required as a result of the comments received on the Draft EIR.

Chapter 3.0 of this document includes responses to each individual comment received on the Draft EIR. **Chapter 4.0** of this document includes editorial revisions made in response to comments.

2.0 LIST OF FINAL EIR RECIPIENTS

2.1 FEDERAL AND STATE AGENCIES

California Department of Toxic Substances Control

California Department of Transportation

California Public Utilities Commission

California State Clearinghouse

2.2 REGIONAL AND LOCAL AGENCIES

Dixon-Solano Municipal Water Service

Yolo Solano Air Quality Management District

2.3 INDIVIDUAL AND LOCAL ORGANIZATIONS

McDonough Holland & Allen, PC

OMNI-MEANS, Ltd.

Linda R. Sikes

Skip and Jill Simmons

Michael Smith

3.0 RESPONSES TO WRITTEN COMMENTS

3.1 INTRODUCTION

This chapter provides responses to the comments received during the public review period for the *Flying J Travel Plaza DEIR*. Copies of all comment letters received on the DEIR and written responses to those comments are provided below. Each comment letter is assigned a number (in numerical order) and comments within each letter are keyed by number on the copies of the letters.

3.2 LIST OF COMMENTORS

3.2.1 Federal and State Agencies

1. California Department of Toxic Substances Control, October 11, 2006
2. California Department of Transportation, October 5, 2006
3. California Public Utilities Commission, September 18, 2006
4. California State Clearinghouse, October 17, 2006

3.2.2 Regional and Local Agencies

5. Dixon-Solano Municipal Water Service, October 16, 2006
6. Yolo Solano Air Quality Management District, October 11, 2006

3.2.3 Individual and local Organizations

7. McDonough Holland & Allen, PC, October 5, 2006
8. OMNI-MEANS, Ltd., October 3, 2006
9. Linda R. Sikes, October 26, 2006
10. Skip and Jill Simmons, October 16, 2006
11. Michael Smith, October 1, 2006

Letter No. 1

Department of Toxic Substances Control

Linda S. Adams
Secretary for
Environmental Protection

Maureen F. Gorsen, Director
8800 Cal Center Drive
Sacramento, California 95826-3200

Arnold Schwarzenegger
Governor

October 11, 2006

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Mr. David Dowswell
Community Development Director
City of Dixon
606 East A Street
Dixon, California 95620

FLYING J TRAVEL PLAZA ENVIRONMENTAL IMPACT REPORT
(SCH # 1999082090)

Dear Mr. Dowswell:

The Department of Toxic Substances Control (DTSC) has reviewed the document described above that proposes rezoning agricultural property to commercial and building a commercial travel plaza on the land. DTSC recommends that additional research be conducted to determine whether pesticides were used on the proposed development site. The site should be evaluated to determine if and where storage, mixing, rinsing and disposal of pesticides may have occurred and whether contamination exists. 1

In addition, although DTSC does not regulate pesticides legally applied to crops, if pesticides have historically been used on the property, we strongly recommend that these areas be tested for environmentally persistent pesticides such as organic pesticides and metals prior to development. The results of any testing should be evaluated to determine if concentrations present in soils will be protective of workers. 2

Please contact me by email at tmiles@dtsc.ca.gov or by telephone at (916) 255-3710, if you have any questions.

Sincerely,

Tim Miles

Tim Miles
Hazardous Substances Scientist

cc: See next page.

Printed on Recycled Paper

cc: Terry Schmidtbauer
Environmental Health Manager
Environmental Health Division
Department of Resource Management
470 Chadbourne Road, 2nd Floor
Fairfield, California 94533

State Clearinghouse
Office of Planning and Research
1400 10th Street, Room 121
Sacramento, California 95814-0613

Planning & Environmental Analysis Section (PEAS)
CEQA Tracking Center
1001 I Street, 22nd Floor
P.O. Box 806
Sacramento, California 95812-0806

3.3 COMMENTS AND RESPONSES

3.3.1 Letter 1: California Department of Toxic Substances Control, October 11, 2006

Letter 1, Comments 1 and 2

The project area is dominated by agricultural uses with scattered vacant lands and commercial and industrial uses, including the Campbell Soup and Supply Company, LLC and a truck repair and parts company 0.8 mile to the southeast, a produce market and two gas stations within 0.5 mile to the north, a Caltrans maintenance yard and a roof truss manufacturer within 0.5 mile to the northeast, and a Wal-Mart 1.5 miles to the southwest. Agricultural land uses are associated with hazardous materials use and storage because of the use of pesticides, herbicides, fungicides, fertilizers, petroleum-related compounds, and other chemicals used in farming.

A Phase I Environmental Site Assessment (ESA), performed by Anderson Consulting Group in 1993, noted the potential for routine use of pesticides. However, a subsequent Phase I ESA in 2001 and a 2005 Phase II ESA performed for the adjacent parcel did not identify major contamination issues, except for an area which had been sued for chemical storage. A Phase II was not performed for the project site, but given the historical use of the project site for agricultural production, and the discovery of contamination issues at the adjacent site, the city conservatively assumes the presence of pesticides on the project site. For these reasons, **Mitigation Measure 4.5-2** has been revised to provide for groundwater monitoring by the Solano County Environmental Management Department if contaminated soil is discovered on site. These changes are reflected in **Chapter 4.0, Revisions to the Draft EIR,** of this document. With the changes/additions to **Mitigation Measure 4.5-2**, which address the potential public health risk to construction workers, construction workers and their supervisors would be aware of the potential for encountering previously unidentified contamination. If contamination is observed or suspected, then construction activities would cease, and an environmental professional would further assess the site. It should be noted that because of the commercial nature of the project, that upon completion of construction, there would be no sensitive receptors located at or near the site.

Letter No. 2

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION
111 GRAND AVENUE
P. O. BOX 23660
OAKLAND, CA 94623-0660
PHONE (510) 286-5505
FAX (510) 286-5559
TTY (800) 735-2929

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Flex your power!
Be energy efficient!

October 5, 2006

SOL080248
SOL-80-39.74
SCH1999082090

Mr. David Dowswell
City of Dixon
600 East A Street
Dixon, CA 95620-3697

Dear Mr. Dowswell:

Flying J Travel Plaza – Draft Environmental Impact Report (DEIR)

Thank you for continuing to include the California Department of Transportation (Department) in the environmental review process for the proposed project. We have reviewed the DEIR for the Flying J Travel Plaza Project and we have the following comments to offer:

Highway Operations

On page 2.0-11, the document states, "the project will not result in any significant impacts that cannot be mitigation [*sic*] to a less-than-significant level. More specifically, the project will not result in unacceptable levels of service at existing intersections in the vicinity of the project." However, pages 4.10-35 and 4.10-36 state 'the project would add to unacceptable level of service operations at existing intersections under future background conditions. This would be considered a significant impact." Specifically, the project would add "more than 5 seconds delay to already unacceptable weekday PM peak hour operation at the Interstate 80 (I-80) Eastbound Ramps/Sievers Road/Pedrick Road and I-80/Westbound Ramps/Sparling Lane/Pedrick Road intersections." The report states, "No mitigation has been identified for this unavoidable, significant impact." 1

The document for the Flying J Travel Plaza states that the project will pay its fair share for improvements to the transportation system that are needed to mitigate many of the negative traffic impacts. Please clearly state if mitigation has been identified and the project will pay its share to mitigate this unavoidable significant impact

It appears that the unavoidable, significant impacts to existing intersections will be mitigated if related transportation improvements (reconstruction and widening of the I-80 overcrossing, reconstruction of the on- and off-ramps with I-80, installation of traffic signal control at the ramp terminal intersections, and improvements (signalization, etc.) to adjacent intersections) are included in the City's Capital Improvements Program (CIP). 2

Traffic Operations

Since the project will have a permanent traffic impact due to the proposed installation of traffic signals, please provide a Permit Engineering Evaluation Report (PEER) with your permit application submittal. For information on preparation of the PEER, refer to the following website: http://www.dot.ca.gov/hq/traffops/developserv/permits/applications/index.html

3

The State "Right-of-Way" should be clearly labeled on future plan sheets.

In the appendix, the title on Peak Hour Volume Warrant Graphs is incorrect; the reference to I-5 should read I-80.

4

Please call Christian Bushong of my staff at (510) 286-5606 if you have any questions.

Sincerely,

Timothy C. Sable

TIMOTHY C. SABLE
District Branch Chief
IGR/CEQA

c: State Clearinghouse

3.3.2 Letter 2: California Department of Transportation (Caltrans), October 5, 2006

Letter 2, Comment 1

The DEIR incorrectly states in the second paragraph on page 2.0-11 that "The project would not result in any significant impacts that cannot be mitigation to a less-than-significant level. More specifically, development of the project would not result in unacceptable levels of service at existing intersections in the vicinity of the project." These sentences have been corrected as reflected in **Chapter 4.0** of this document, to say: "The project would result in significant impacts that cannot be mitigated to a less-than-significant level. More specifically, development of the project would result in unacceptable levels of service at existing intersections in the vicinity of the project."

Letter 2, Comment 2

The City of Dixon will cooperate with Caltrans in planning, as part of its long-term capitol improvements program (CIP), the reconstruction and widening of the Interstate 80 (I-80) over-crossing, reconstruction of the I-80 freeway on- and off-ramps, installation of traffic signal controls at the I-80 ramp intersections, and other improvements (signalization, etc.) to adjacent intersections. The project would be required to provide a fair share contribution toward these projects. Furthermore, inclusion of adjacent intersections would mitigate impacts to existing intersections.

However, as of June 2007, the City had not included these improvements in its CIP. Without inclusion of these improvements in the CIP, the City is not able to assign a cost of these improvements and therefore, cannot quantify a fair-share proportion for the proposed project. If the City does not include needed improvements in its CIP, or if it is uncertain whether these improvements could be fully funded if they were added to the City's CIP, this anticipated future impact would be unmitigated under future year 2025 (cumulative) conditions. Because of this uncertainty, the cumulative impact of future site development to the two intersections is considered significant and unavoidable. This EIR presents the conclusion that the Mitigation Measure for **Impact 4.10-6** that "no mitigation measures have been identified for this unavoidable, significant impact."

Letter 2, Comment 4

Comment noted.

Letter 2, Comment 5

The reference to Interstate-5 has been replaced with I-80 on the Appendix title "Peak Hour Volume Warrant Graphs." This correction is reflected in **Chapter 4.0**, of this EIR.

Letter No. 3

STATE OF CALIFORNIA — ARNOLD SCHWARZENEGGER, *Governor*

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

September 18, 2006

David Dawswell
City of Dixon
600 E. A Street
Dixon, CA 95620

Dear Mr. Dawswell:

Re: SCH #1999082090; Flying J Travel Plaza

As the state agency responsible for rail safety within California, we recommend that any development projects planned adjacent to or near the rail corridor in the County be planned with the safety of the rail corridor in mind. New developments may increase traffic volumes not only on streets and at intersections, but also at at-grade highway-rail crossings. This includes considering pedestrian circulation patterns/destinations with respect to railroad right-of-way.

Safety factors to consider include, but are not limited to, the planning for grade separations for major thoroughfares, improvements to existing at-grade highway-rail crossings due to increase in traffic volumes and appropriate fencing to limit the access of trespassers onto the railroad right-of-way. Of particular concern is the cumulative impact of the numerous developments planned in the vicinity. 1

The above-mentioned safety improvements should be considered when approval is sought for the new development. Working with Commission staff early in the conceptual design phase will help improve the safety to motorists and pedestrians in the County.

If you have any questions in this matter, please call me at (415) 703-2795.

Very truly yours,

Kevin Boles
Utilities Engineer
Rail Crossings Engineering Section
Consumer Protection and Safety Division

cc: Pat Kerr, UP

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3.3.3 Letter 3: California Public Utilities Commission, September 18, 2006

Letter 3, Comment 1

The PUC's requirement for planning in the vicinity of at-grade rail crossings is acknowledged. The distribution of traffic to and from the project site is expected to travel via Pedrick Road to access I-80. The referenced railroad crosses Pedrick Road approximately one-half mile south of the project site boundary, and even further south of I-80. Based on a conservative estimate of northbound and southbound volumes on Pedrick Road, the project would be expected to contribute about 32 two-way vehicle trips (about a 12 percent increase) above existing volumes during the AM peak hour, and 25 trips (about a 7 percent increase) above existing volumes during the PM peak hour. Under future (2025) PM peak hour conditions, with buildout of Dixon's Northeast Quadrant Specific Plan (NQSP), the project's contribution to through traffic volumes at the railroad crossing would be less than 1 percent. The type of traffic added to Pedrick Road at the railroad crossing would be similar to the traffic using the road today, a mix of vehicles and trucks. These vehicles would be expected to obey traffic controls already installed at the gated crossing and therefore, additional project vehicle trips traveling through this at-grade crossing is not expected to result in a safety hazards for existing and future users of the at-grade crossing.

Letter No. 4

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit

Arnold Schwarzenegger
Governor

Sean Walsh
Director

October 17, 2006

David Dowswell
City of Dixon
600 East A Street
Dixon, CA 95620

Subject: Flying J Travel Plaza
SCH#: 1999082090

Dear David Dowswell:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on October 16, 2006, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

> "A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Terry Roberts

Terry Roberts
Director, State Clearinghouse

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Enclosures
cc: Resources Agency

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Document Details Report
State Clearinghouse Data Base

SCH# 1999082090
Project Title Flying J Travel Plaza
Lead Agency Dixon, City of

Type EIR Draft EIR

Description The project is proposed development of a Flying J Travel Plaza on a portion of a 60-acre property, south of the Pedrick Road / I-80 interchange, in the City of Dixon. The project would develop approximately 27 acres of the 60-acre property with a Flying J Travel Plaza. In addition to providing fueling services for diesel and gasoline vehicles, the facility would include a 17,838-square-foot structure with a 24-hour convenience store, restaurant, fast-food court, driver lounge, and laundry and shower facilities. The project would also develop an offsite stormwater detention basin facility on the east side of Pedrick Road. No development of the remaining 33 acres is proposed at this time.

Lead Agency Contact

Name David Dowswell
Agency City of Dixon
Phone (707) 678-7004 **Fax**
email
Address 600 East A Street
City Dixon **State** CA **Zip** 95620

Project Location

County Solano
City Dixon
Region
Cross Streets Pedrick Road / I-80
Parcel No. 0111-010-070
Township **Range** **Section** **Base**

Proximity to:

Highways I-80, 505
Airports
Railways UPRR
Waterways
Schools
Land Use Commercial Highway

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Biological Resources; Cumulative Effects; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Growth Inducing; Landuse; Noise; Public Services; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife

Reviewing Agencies Resources Agency; Regional Water Quality Control Bd., Region 5 (Sacramento); Department of Parks and Recreation; Native American Heritage Commission; Public Utilities Commission; Department of Fish and Game, Region 3; Department of Water Resources; Department of Conservation; California Highway Patrol; Caltrans, District 4; Department of Toxic Substances Control; Department of Health Services

Date Received 08/31/2006 **Start of Review** 08/31/2006 **End of Review** 10/18/2006

Note: Blanks in data fields result from insufficient information provided by lead agency.

3.3.4 Letter 4: California State Clearinghouse, October 17, 2006

This letter states that the DEIR prepared for the proposed project was circulated to applicable state agencies for the mandated 45-day public review period, which ended on October 16, 2006. (Upon request, the mandated 45-day comment period was extended to December 1, 2006). No specific comments referencing the technical analyses in the EIR are provided.

Letter No. 5

DIRECTORS
ROBERT HANSEN
PRESIDENT - DIV. #5
GUIDO E. COLLA
VICE PRESIDENT - DIV. #4
ROBERT S. CURREY
DIV. #1
BOB BISHOP
DIV. #2
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OFFICERS
SUZANNE BUTTERFIELD
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SUMMERS ENGINEERING
DISTRICT ENGINEER
MINASIAN, SPRUANCE, MEITH, SOARES & SEXTON
ATTORNEYS
STEPHEN J. CARBONARO
TREASURER

October 16, 2006

Dave Dowswell
City of Dixon
Community Development Dept.
600 East A Street
Dixon, California 95620

Subject: ***Flying J Truck Stop, Draft EIR Review and Comment***

Dear Dave:

We are in receipt of the draft Environmental Impact Report (EIR) for the Flying J Truck Stop project in Dixon. Domestic water is provided by Dixon-Solano Municipal Water Service (DSMWS). The following are the District's comments, on behalf of DSMWS, on the Draft EIR:

1. Page 4.11-6 last paragraph of section 4.11.2.4. DSMWS standards now require two (2) 1,000,000 gallon tanks. Please revise as appropriate. This will provide 4000 gpm fire flow which is consistent with the City of Dixon General Plan. This will be reflected in the next update of the DSMWS Master Plan

1

Thank you for the opportunity to review and comment on this project. If you have any questions, please contact me at (707) 448-6847 ext. 4020 or email pfuchslin@sidwater.org

Sincerely,

Paul Fuchslin, P.E.
Supervising Civil Engineer
Solano Irrigation District, on behalf of DSMWS

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508 ELMIRA ROAD, VACAVILLE, CA 95687-4999 · TELEPHONE (707) 448-6847 · (800) 675-3833 · FAX (707) 448-7347

3.3.5 Letter 5: Dixon-Solano Municipal Water Service (DSMWS), October 16, 2006

Letter 5, Comment 1

As indicated on page 4.11-6 of the DEIR, the Dixon-Solano Municipal Water Service (DSMWS) prepared a Water Supply Assessment (WSA) for the Northeast Quadrant Specific Plan (NQSP) in 2003. According to the WSA, DSMWS would need to expand two 1,500 gallon per minute (gpm) groundwater deepwell facilities, construct a 1-million-gallon water storage tank, and install a 2,000 gpm booster pump station in the NQSP area to provide sufficient production and delivery capacity to the future development in the NQSP area. According to Letter 5, DSMWS standards now requires two (2) 1-million-gallon tanks to provide sufficient delivery capacity for buildout of the NQSP area. This new requirement will be reflected in the next update of the DSMWS Master Plan. The following text change has been added to the DEIR, and is reflected in **Chapter 4.0** of this EIR: "The WSA proposed two, 1,500 gpm groundwater deepwell facilities; a 1 million-gallon water storage tank; and a 2,000-gpm booster pump station in the NQSP. However, since the preparation of the WSA, the DSMWS has indicated that new standards now require an additional 1-millon-gallon tank for total storage capacity of 2 million gallons, which will be reflected in the next update of the DSMWS Master Plan."

Letter No. 6

1947 Galileo Ct., Suite 103 • Davis, California 95616

YOLO-SOLANO AIR QUALITY MANAGEMENT DISTRICT

(530) 757-3650 • (800) 287-3650 • Fax (530) 757-3670

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October 11, 2006

City of Dixon
Mr. David Dowswell
Community Development Director
600 East A Street
Dixon, CA 95620-3697

Re: Flying J Travel Plaza

Dear Mr. Dowswell:

The Yolo Solano Air Quality Management District (District) received a copy of the Draft Environmental Impact Report (DEIR) for the project referenced above and appreciates the opportunity to review and offer comments. The District provides the following comments to ensure completeness of the air quality analysis and offers recommendations for how the project's impact on air quality can be reduced.

The Flying J Travel Plaza project proposes development of about 27 acres of the 60 acre property with fueling services for diesel and gasoline vehicles, a 17,638 square-foot facility would include a 24-hour convenience store, restaurant, fast-food court, driver lounge, laundry and shower facilities, and parking for 221 commercial trucks, 10 Recreational Vehicles, and 115 automobiles. The District asks that the air quality analysis incorporate the following clarifications, additional information, and District recommended mitigation measures.

Clarifications and Additional Information

1) Section 4.3.2.2 - Regional Air Quality

   a) The second paragraph includes a statement that a considerable amount of the ozone pollutants have been transported from the Sacramento metropolitan area. The Air Resources Board (ARB) has published several reports that provide technical assessments of transport relationships between air basins and regions in California. However, the ARB has not evaluated emissions transport on a "district-to-district" scale. The ARB has identified the "Broader Sacramento Area" as transporting to the Upper Sacramento Valley, the San Joaquin Valley, the San Francisco Bay Area, and the Mountain Counties. Included in the "Broader Sacramento Area" is the Yolo-Solano Air Management Quality District. Please revise the statement in light of this information. 1

   b) The third paragraph includes unsubstantiated information which may confuse readers. The author should include citations that support the claims made in the paragraph such as: 1) Emissions of particulate matter less than ten microns (PM_{10})in the project area arise 2

from agricultural processes that dominate the region, 2) measures are being taken to reduce PM_{10} emission from agricultural processes include agricultural burning and required field wetting.

With regards to item #1, while agricultural processes do contribute to overall PM_{10} levels, there are many other source categories that produce PM_{10} in the area as well. The emissions inventory for Solano County, as maintained by the ARB, shows that dust from paved and unpaved roads and motor vehicle emissions, for instance, are also producers of PM_{10} in Solano County. Agricultural processes are only part of the overall PM_{10} inventory. 3

Regarding item #2, agricultural burning has been regulated since the 1970s, and other than the phase down of rice burning in the 1990s, the District is not aware of any additional measures being taken to reduce agricultural burning emissions nor of any District agricultural requirement for field wetting.

2) Section 4.3.2.3 Local Air Quality

a) Since PM_{10} is one of the pollutants of greatest concern for this analysis, and since the PM_{10} monitoring data comes from the Woodland-Gibson Road monitoring station, the heading of the second paragraph should be revised to reflect that the monitoring data in Table 4.3-3 was not collected only from the UC Davis monitoring site. The District also recommends revising the title for Table 4.3-3 to indicate that some of the monitoring data presented was collected from the Woodland-Gibson monitoring station 4

b) The second paragraph includes a statement about PM_{10} trends as monitored in the vicinity of the project site. The District believes that the statement that PM_{10} has been steadily rising since 2000 is misleading and inaccurate. As referenced in the footnotes to Table 4.3-3, the number of PM_{10} violations in 2004 at the Woodland-Gibson Road monitoring station was influenced by nearby construction grading activity and do not reflect normal ambient conditions. In addition, according to the ARB emissions inventory, only one PM_{10} exceedance was recorded at the Woodland-Gibson Road monitoring station in 2005. This would indicate that PM_{10} levels at the nearest monitoring site are remaining relatively constant or are improving. An examination of the number of days the PM_{10} samples exceeded the state 24-hour standard for the same period from two other nearby District monitoring stations, Vacaville-Merchant and West Sacramento, show an improving trend over the 2000 – 2005 timeframe. 5

3) Section 4.3.3.2 California Air Resources Board

a) The second paragraph gives an incomplete description of the California Clean Air Act (CCAA) requirement for nonattainment ozone areas. The CCAA requires an air quality strategy to achieve a five percent average annual ozone precursor emission reduction when implemented or, if that is not achievable, to expeditiously adopt every feasible emission control measure under air district purview [California Health and Safety Code section] CH&SC §40914). The 2003 Triennial Assessment and Plan Update reflect expeditious adoption of every feasible control measure. 6

b) The District's state attainment status for ozone is identified as "nonattainment" in Table 4.3-5, however, by operation of law (CH&SC §40925.5), our current state ozone designation based on the ambient monitoring data is "nonattainment-transitional. However, the proposed 2006 designation is "nonattainment". 6

4) Impact 4.3-2: Non-Mobile Operating Engine Sources (page 4.3-37

a) The first paragraph under the heading "Non-Mobile Operating Engine Sources" includes the applicant's proposal for a "no idle" facility. If this is proposed as a mitigation measure, the document should provide more information about the "no idle" program, especially its anticipated effectiveness and how the program will be enforced. The air quality impact analysis assumes 100 percent compliance with the "no idle" program. However, it is plausible that there will be a certain rate of noncompliance, especially since the document reports that about a quarter of the trucks resting would be dependent on "weather conditions moderate enough that heating or air conditioning would not be necessary." Temperatures in the lower Sacramento Valley have been recorded lower than freezing in the winter and above 110°F in the summer. These are not moderate temperatures. The report should specify how the no-idling program could be enforced for trucks staying at the facility for extended periods during more extreme weather conditions. 7

b) Also in the first paragraph, the applicant indicated that 35 percent of the trucks that visit the proposed project would pull trailers equipped with Transport Refrigeration Units (TRUs). This statement should be substantiated and documented. When making assumptions about project emissions, the applicant should generally default to the worst-case scenario so as not to underestimate emissions. 8

c) The second paragraph estimates that 50 percent of the heavy-heavy-duty trucks resting would operate an auxiliary power unit (APU). This assumption should be substantiated, as it affects the total emissions impact of the project. 9

d) Also in the second paragraph, the applicant specifies that trucks not using APUs for comfort features would be supplied with an electrical hookup by the Travel Plaza. This should be called out as an individual mitigation measure. In the mitigation measure, detailed information should be provided about the electrical hookup infrastructure such as the type of hookups and the number of hookups that will be available. 10

Impacts and Mitigation Measures

1) Construction

Below are two additional mitigation measures recommended for reducing exhaust PM_{10} as well as Reactive Organic Gases (ROG) and Nitrogen Oxide (NOx) emissions from construction equipment used in Site Grading (Phase I) and in Building Construction (Phase II). 11

- Restrict unnecessary idling for all diesel construction vehicles and equipment to 5 minutes. This would be more restrictive than the Northeast Quadrant Specific Plan

(NQSP) measure AQ-I limit of 10 minutes and should be incorporated as Mitigation Measure 4.3-1c.

- The NQSP Measure AQ-K states that new technologies should be used "...as they become available and feasible." The District believes that these devices are available and technologically feasible. The applicant should expand their discussion and commitment on how they will encourage and/or require contractors to use catalyst and filtration technologies, and modernize the equipment fleet with cleaner and newer engines. 11

Many of the heavy-duty diesel mitigation measures may qualify for state or local air district incentive funding programs. Contact the District if interested in learning more about incentive funding programs.

2) On-Site TRU Stationary Emissions (page 4.3-38) 12

a) The DEIR should include information that all TRUs operating in California are subject to the ARB's Air Toxic Control Measure (ATCM) to reduce diesel particulate emissions from TRU's. (California Code of Regulations, Title 13, Section 2477)

b) As 54 percent of the project's NOx emissions will be generated by TRUs, the District recommends that the applicant consider the following mitigation measures to reduce the load on the TRUs, which consequently reduces the associated emissions from TRUs: 13

i) Provide a dedicated parking area for TRU equipped trailers that will have rest periods of more than 2 hours. This dedicated parking area will be shaded by a structure, such as an overhead canopy to reduce direct solar exposure and associated heat gain on the trailers and surrounding pavement. Structure shading is for the purpose of reducing temperatures in the area, thereby reducing the TRUs workload, fuel consumption and emissions. This would be most important during the hot summer months, which coincide with the peak ozone season.

3) Idling Restriction

a) Beginning January 1, 2008, Phase 2 of the ARB ATCM to limit diesel vehicle idling is scheduled to come into effect statewide. This will limit idling of the main engine for sleeper cab equipped trucks as well as for trucks not equipped with sleeper cabs to no more than 5 minutes and require alternatives to idling during driver rest periods. To ensure that truck idling is kept to a minimum, the District recommends that an on-site customer education and enforcement program be provided by the applicant to supplement state idling regulation enforcement. The program should include but not limited to signage at strategic locations, literature, products that offer alternatives to idling such as ARB certified APUs, ARB certified gas fired heaters and inverter/chargers to be used with on-site electrical infrastructure or provide full service electrical infrastructure. 14

4) Mitigation Measure 4.3-3c: TRU Emission Reductions (page 4.3-42) 15

Although the heading seems to indicate that this is a mitigation measure, the applicant then proceeds to explain why the listed options are "not feasible to reduce the project's NOx emissions". This mitigation measure is misleading and should be deleted or commitments should be made to incorporate the controls. 15

5) Mitigation Measure 4.3-3d: APU and Truck Emission Reduction (page 4.3-43)

Similarly, although the heading seems to indicate that this is a mitigation measure, the applicant is not committing to any action that will reduce operational emissions from the project. The mitigation measure merely discusses off-board power infrastructure to provide electrical power for driver accessories. The measure then apparently dismisses implementation of this option as too costly. The District believes that the infrastructure and equipment necessary for truck electrification should be installed to reduce the impact from the project. If the District is misreading the discussion on page 4.3-43 and in fact the applicant is proposing to spend the quoted $1,040,000 on an electrification system, please disregard this comment. If no off-board power infrastructure is planned on being installed by the applicant, project operational emissions should be recalculated because the analysis assumes a portion of the resting trucks would use such a system. 16

If necessary, the applicant could consider a phase-in approach to provide electrification for all resting trucks in order to provide heating, cooling, and electrical accessories for truck operators without engine idling. If this were the case, some kind of plan or commitment with a schedule should be proposed.

6) Structures and Landscaping:

The following on-site mitigation measures should be implemented to reduce on-site temperatures and potentially reduce vehicle trips: 17

a) Planting trees and shrubs near buildings to cool the area around the buildings and prevent direct solar radiation from entering the building through windows and from heating external building structures.

b) Improving reflectivity of buildings to reduce the amount of solar heat buildings absorb. Higher temperatures increase the demand for air conditioning. Incorporate energy star rated reflective roofing and energy star appliances, lighting, heating and cooling systems throughout the project to reduce electrical consumption of the project. 18

c) Parking lots and egress/ingress areas should be designed to calm/reduce traffic speeds and provide safe and convenient access to the facilities for customers once they have left their vehicles. Parking lots should include planting of trees for shading in accordance with the City of Dixon. 19

d) Provide secure and convenient bicycle parking and storage facilities near the main entrance of the convenience store and restaurant for use by employees or local and regional bicyclists who may patronize the facility. 20

e) Provide employees with information on ridesharing and carpooling programs. 21

7) Health risk assessment

Page 4.3-45 states that there are no residences within the 10-in-one-million isopleth and that the nearest residence is located south of the Travel Plaza near Vaughn Road. The District believes that there are 2 residences along Sievers Road (approximately 1000 feet due north of the project site) and possibly another residence on Sievers Road (approximately 3000 feet of the other residences) that are within the isopleth.

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In addition, page 4.3-46 states that there are no known workplaces within the 10-in-one-million isopleth. There is a gas station at the northwest corner of the intersection of Pedrick Road and Interstate 80, which would be within the isopleth.

8) Future Controls of TRUs

Technology for the control of TRU emissions is still in development at this time. In the future, TRU emission controls may be much more common, but may require infrastructure at a truck stop to be effective. The Lead Agency may require the applicant to periodically re-evaluate TRU emissions reductions technology, and to supply any appropriate infrastructure in order to make new TRU technology usable on-site.

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In conclusion, the District appreciates receiving the DEIR and the opportunity to provide our recommendations presented in this letter. The District would be happy to meet with you to discuss our comments further. If you require additional information, please contact me at (530) 757-3668.

Sincerely,

Matt Jones

Matt Jones
Senior Air Quality Planner

3.3.6 Letter 6: Yolo-Solano Air Quality Management District, October 11, 2006

Letter 6, Comment 1

Section 4.3.2.2, **Regional Air Quality** (page 4.3-3), of the DEIR, states that the transport of air emissions from the Sacramento Metropolitan Area to the San Francisco Bay Area would entail movement of pollutants through the project area. According to Letter 6, the Air Resources Board (ARB) has published several reports that provide technical assessments of transport relationships between the air basins and regions in California, but the ARB has not evaluated emissions on a "district-to-district" scale. Furthermore, the ARB has identified the "Broader Sacramento Area" as transporting to the Upper Sacramento Valley, the San Joaquin Valley, the San Francisco Bay Area, and the Mountain Counties. The text in **Section 4.3.2.2** of the DEIR has been amended to clarify ARB's existing technical knowledge regarding this information, and is reflected in **Chapter 4.0** of this EIR.

Letter 6, Comments 2 and 3

The DEIR states (on page 4.3-5) that PM_{10} emissions in the project area arise from agricultural processes that dominate the region around Dixon. This statement was not intended to imply that respirable particulate matter (PM_{10}) emissions are predominately caused by agricultural operations in the Dixon area. Nonetheless, PM_{10} emissions from agricultural processes accounted for 25 percent of the Yolo-Solano Air Quality Management District (YSAQMD)'s areawide PM_{10} sources in 2005 and 23 percent of total anthropogenic PM_{10} sources in 2005. This would constitute a substantial amount of the PM_{10} emissions in the District. Measures to reduce PM_{10} emissions from agricultural processes are being researched by the scientific community and not necessarily by the YSAQMD. The statement has been revised, and is reflected in **Chapter 4.0** of this document, to clarify this point.

Letter 6, Comment 4

The heading for the second paragraph in **Subsection 4.3.2.3, Local Air Quality** of the DEIR has been revised to reflect information presented in **Table 4.3-3, Ambient Pollutant Concentrations Registered at UC Davis**, which includes

monitoring data from locations other than UC Davis. This change is reflected in **Chapter 4.0** of this document.

Letter 6, Comment 5

The text on page 4.3-6 of the DEIR incorrectly states that PM_{10} has been steadily rising since 2000. The text in the DEIR has been corrected, and is reflected in **Chapter 4.0** of this document.

Letter 6, Comment 6

The text on page 4.3-6 of the DEIR partially describes the California Clean Air Act (CCAA) requirement for nonattainment ozone areas. According to Letter 6, the CCAA requires an air quality strategy to achieve a five percent average annual ozone precursor emission reduction when implemented. If that is not achievable, the CCAA requires the adoption of every feasible emission control measure under the purview of the air district. While Solano County's ozone designation had been nonattainment-transitional by operation of law, the California Air Resources Board's 2006 designations, which were adopted on November 16, 2006, show only Colusa and Glenn County in the Sacramento Valley Air Basin to be "nonattainment transitional" and the remaining area to be "nonattainment." In light of the above, the text in the DEIR has been revised appropriately; these changes are reflected in **Chapter 4.0** of this EIR.

Letter 6, Comment 7

As described in **Section 3.4.5** of the DEIR, Flying J has proposed to operate the Travel Plaza as a "no-idle" facility. Although limitations on truck idling are considered to be a project feature, the DEIR has been revised to include **Mitigation Measure 4.3-3e**, which is presented in **Chapter 4.0** of this document: This mitigation measure requires that trucks parked at the Flying J Travel Plaza shall not idle for longer than five minutes, in conformance to the California Air Resources Board's requirements with respect to commercial truck idling. The operators of the Flying J Travel Plaza shall enforce and carry out the idling program by posting signs along the route to the on-site truck parking area and place them selectively in the truck parking areas. The signs will inform site users of the ARB regulation that prohibits trucks from idling more than five minutes when not engaged in an operational activity. Educational brochures shall be

made available at the Dixon Flying J Travel Plaza explaining the no-idling regulation. Future Flying J employees shall inform on-site truck drivers regarding the no idling restriction during their normal patrolling of the parking area to pick up garbage and to identify, prevent, or report illicit activities to local law enforcement officials. This shall be incorporated into the employee manual, which shall be provided to all employees.

The analysis in the DEIR assumes that all heavy heavy-duty trucks would idle for the maximum allowed time (five minutes). In reality, not all trucks would idle for their maximum allotted time period. Enforcement of the no-idling program would be carried out by the operators of the Flying J Travel Plaza. As stated in the DEIR, truck drivers would be notified about this requirement upon entering the Travel Plaza. (See Letter 6, Comment 14 below, for additional information regarding measures to ensure a no-idle facility.) Furthermore, the revised Airborne Toxic Control Measure (ATCM) to reduce idling emissions from new and in-use trucks was adopted by the ARB on October 20, 2005, approved by the Office of Administrative Law (OAL) on October 15, 2006, and became effective November 16, 2006. All trucks operating in the State of California must comply with the ATCM. The ATCM further requires that all new 2008 and subsequent model-year heavy-duty diesel engines be equipped with an engine shutdown system that automatically shuts down the engine after 300 seconds of continuous idling operation once the vehicle is stopped, except under specific circumstances listed in the ATCM. This requirement would help to ensure that newer trucks would meet the no-idling requirement of the Travel Plaza. Under the ATCM, enforcement authority is also given to the ARB, peace officers and their respective law enforcement agencies' authorized representatives, and air pollution control or air quality management districts.

Letter 6, Comment 8

The first paragraph on page 4.3-37 of the DEIR provides a description of the proposed "no idle" facility. The DEIR estimated that 35 percent of the trucks would pull a transport refrigeration unit (TRU)-equipped trailer. This estimation was based on observations from a similar Flying J facility in Ripon, California. The text in the DEIR has been revised, and the revisions are presented in **Chapter 4.0** of this document.

Letter 6, Comment 9

The second paragraph on page 4.3-37 of the DEIR, estimates that 50 percent of the trucks would operate an auxiliary power unit (APU) for rest periods. This was based on the applicant's assumption, and based on industry data, and it is believed to be a reasonable, and conservative, assumption with respect to air quality. In the near-term, most trucks would not be equipped with APUs and would not be allowed to stay at the project site and idle their main engines. Over time, more trucks would be equipped with APUs or be electrically powered. Trucks that could not comply with the no-idle restriction would not be allowed to stay at the Travel Plaza.

Letter 6, Comment 10

The project applicant has indicated that electrical infrastructure would be provided for trucks using the site. This measure is a project feature and is not a mitigation measure. Also, as noted in the DEIR, in some cases the weather conditions may be moderate enough for truck drivers to not require additional heating or cooling. The project is in the planning stage, and a detailed design has not been prepared. However, the project applicant intends to initially install the electrical conduit so that electrical wiring can be added as more trucks have the capability to operate on line power (as opposed to running the main truck engine or an auxiliary power unit). The Travel Plaza will have the capacity to adapt to future needs of their customers and provide alternative power as necessary. The DEIR assumed that 50 percent of the trucks that stay more than two hours (i.e., overnight) would use APUs to provide heating, cooling, and electrical needs for the drivers. The remaining trucks would either use an electric hookup (as they become available) or weather conditions would not necessitate additional heating or cooling. No assumptions were made regarding the split between these two options. The latter two options would have the same effect on the project's air emissions; that is, they would not generate any additional direct air emissions or influence the project's air quality impacts. The presence or absence of electrical hookups would not affect the analysis in the DEIR provided that no more than 50 percent of the trucks that stay overnight would be equipped with APUs. Therefore, the requirement of the electrical hook-ups as a mitigation measure is not required pursuant to CEQA since it would not reduce or minimize the significance of the impact. This is believed to

be a reasonable, and conservative, assumption given that most trucks are not currently equipped with APUs.

Letter 6, Comment 11

The revised Airborne Toxic Control Measure (ATCM) for truck idling, which became effective in November 2006, would limit heavy-heavy-duty trucks, such as those delivering materials to the construction site, to five minutes of idling when not involved in an operational activity. It is agreed that a more restrictive idle restriction could be imposed as a mitigation measure. Mitigation Measure AQ-I from the Northeast Quadrant Specific Plan EIR, with a revision to limit idling time to five minutes per the ATCM, has been added to the DEIR as Mitigation Measure 4.3-1a. This change is reflected in **Chapter 4.0** of this document.

NQSP Mitigation Measure AQ-K is listed under project Mitigation Measure 4.3-1a. The specifics of the construction fleet would not be known at this time. The City will determine appropriate emission controls at the time that Flying J submits its grading plan to the City.

Letter 6, Comment 12

The ATCM applies to "owners and operators of diesel-fueled TRUs and TRU gen[erator] sets … that operate in the state of California. This specifically includes:

(A) Operators and owners of California-based TRUs and TRU gen sets that are installed on trucks, or trailers, shipping containers, or railcars; and

(B) Operators and owners of non-California-based TRUs and TRU gen[erator] sets that are installed on trucks, trailers, shipping containers, or trailers." (California Code of Regulations, Title 13, Division 3, Chapter 9, Article 8, Section 2477)

The text in the DEIR has been revised to reflect this statement under the description of the ATCM in Section 4.3.3.2. This change is reflected in **Chapter 4.0** of this document.

Letter 6, Comment 13

Requiring a dedicated, covered parking area for refrigerated trailers that are parked more than two hours is a feasible mitigation measure. This measure, as suggested by the commenter, would reduce direct solar radiation on refrigerated trailers such that transport refrigeration units would have to operate less often. As reflected in **Chapter 4.0** of this document, the following mitigation measure has been added to the DEIR as **Mitigation Measure 4.3-3c**:

> *The applicant shall provide a minimum of one dedicated covered parking area for refrigerated trailers that will be parked at the Travel Plaza for more than two hours. The covered parking area shall include a minimum of 30 parking spaces.*

Letter 6, Comment 14

As part of the project and as required in **Mitigation Measure 4.3-3e**, signs would be posted along the route to the on-site truck parking area and placed selectively in the truck parking area. The signs will inform site users of the ARB regulation that prohibits trucks from idling more than five minutes when not engaged in an operational activity. Additionally, as part of the project, educational brochures would be available on-site explaining the no-idling regulation and possible alternatives (i.e., APU). As indicated in **Section 3.4.5** of the DEIR, the applicant is in the process of establishing a network of APU sales and installation locations that would sell and install APUs for those trucks that do not already have them installed. Future Flying J employees would inform on-site truck drivers regarding the no-idling restriction during their normal patrolling of the parking area to pick up garbage and to identify, prevent, or report illicit activities to local law enforcement officials. As part of the project, air-conditioned facilities would be provided for drivers to rest, for unspecified periods of time. This would result in a decreased need for truck drivers to idle their trucks while at the facility.

Letter 6, Comment 15

The DEIR provides a number of different approaches that are available for compliance with the ATCM for TRUs that would reduce the emissions from these sources. This information is provided as mitigation under **Mitigation Measure 4.3-3c** on page 4.3-42 of the DEIR. Because TRUs were the primary

source of emissions, it was thought to be appropriate to indicate potential control measures for those emissions. While some of the measures may be implemented by trucking companies, as indicated in the DEIR, the applicant does not have control over these units. For clarity purposes, the text in the DEIR has been revised to indicate that this is a discussion of other *potential* control measures, and not a recommended mitigation measure for this project. This revision is reflected in **Chapter 4.0** of this EIR.

Letter 6, Comment 16

The information under **Mitigation Measure 4.3-d**, on page 4.3-43 of the DEIR, presents the conclusion that an off-board infrastructure system would not be cost effective to reduce emissions from the proposed project. The mitigation measure would require the applicant to install costly infrastructure, which would only control potential emissions from the truck engines, which are already limited by the idling restriction, installation of electric power for the trucks, and by the alternative use of APUs. The analysis in the DEIR does not rely on the inclusion of off board infrastructure system, but assumes that some trucks will simply not idle their engine or use an APU in accordance with the ATCM for truck idling. For clarity purposes, the text in the DEIR has been revised to indicate that this is a discussion of other *potential* control measures, and not a recommended mitigation measure for this project. This revision is reflected in **Chapter 4.0** of this EIR.

Letter 6, Comment 17

Planting of shade trees in parking areas is included in the DEIR as **Mitigation Measure 4.3-3b** on page 4.3-42. A specific planting plan would be approved by the City of Dixon.

Letter 6, Comment 18

The following mitigation measure has been added to the DEIR as **Mitigation Measure 4.3-3d**:

> *The applicant shall use Energy Star reflective roofing materials, lighting, appliances, and heating and cooling systems to reduce electrical consumption associated with the project.*

This change is reflected in **Chapter 4.0** of this document.

Letter 6, Comment 19

A requirement to plan parking areas and ingress/egress to limit vehicle idling is included in the DEIR as **Mitigation Measure 4.3-3a**. Planting of shade trees in parking areas is included in the DEIR as **Mitigation Measure 4.3-3b.**

Letter 6, Comment 20

A requirement to include bicycle storage racks is included in the DEIR as **Mitigation Measure 4.3-3a**.

Letter 6, Comment 21

Mitigation Measure 4.3-3a in the DEIR requires that information be provided at various locations within the project site about carpool, vanpool, or transit use facilities.

Letter 6, Comment 22

As noted in Letter 6, Comment 22, residences are located on Sievers Road. While the isopleth (a line of constant modeled excess cancer risk) representing a 10 in one million cancer risk for residential receptors, as shown in **Figure 4.3-1, Modeled Impacts of Diesel Exhaust Particulates for Residential Receptors**, in the DEIR, does encompass these residences, the text and **Table 4.3-16, Summary of Maximum Modeled Cancer Risks of Diesel Particulate Matter from the Travel Plaza Operations**, in the DEIR do not correspond to the cancer risk at these residences. The text, **Table 4.3-16**, and **Table 4.3-17**, **Summary of Maximum Noncancer Health Impacts of Diesel Exhaust Particulate Matter from the Travel Plaza Operations**, have been revised to indicate that there are residences for which the cancer risk would be greater than 10 in one million. These changes are reflected in **Chapter 4.0** of this document.

In addition, as indicated in Letter 6, there is a gasoline service station within the 10-in-one-million isopleth for workplace receptors shown in **Figure 4.3-2, Modeled Impacts of Diesel Exhaust Particulates for Workplace Receptors** of the DEIR. The text of the DEIR has been revised to indicate that existing workplace receptors are present within this isopleth. However, the maximum

potential impact occurred at a location zoned for future commercial development on the north side of I-80 in Solano County. The values shown in **Table 4.3-16, Summary of Maximum Modeled Cancer Risks of Diesel Particulate Matter from the Travel Plaza Operations,** and **Table 4.3-17**, **Summary of Maximum Noncancer Health Impacts of Diesel Exhaust Particulate Matter from the Travel Plaza Operations**, of the DEIR, correspond to this potential workplace receptor. Text and table changes are reflected in **Chapter 4.0** of this document.

Letter 6, Comment 23

As noted on page 4.3-16 of the DEIR, there are several methods by which trucking companies are expected to comply with the ATCM for TRUs. As noted previously, the responsibility to comply with this ATCM lies with the owners/operators of the TRUs and not with the applicant or the City. To the extent that TRUs could be operated using electricity as an alternative power supply in the future, the applicant has already proposed to provide electrical infrastructure at the Travel Plaza as that option becomes available.

Letter No. 7

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October 5, 2006

BY FACSIMILE AND OVERNIGHT MAIL

David Dowswell
Community Development Director
City of Dixon
600 East A Street
Dixon, CA 95620-3697

Re: **Flying J Travel Plaza**
Comments on Draft Environmental Impact Report

Dear Mr. Dowswell:

The purpose of this letter is to provide comments on the Draft Environmental Impact Report (DEIR) that has been prepared for the City of Dixon in connection with the proposed Flying J Travel Plaza at the southwest corner of Interstate 80 and Pedrick Road.

This firm represents Campbell Soup Supply Company, LLC (Campbell), the owners and operators of a tomato processing facility on Pedrick Road, and in close proximity to the site proposed for the Flying J Travel Plaza project. Campbell has owned and operated this facility since 1976, during which time they have employed hundreds of Dixon area residents, purchased tomatoes from area growers, and supplies from area vendors. Campbell estimates that this facility contributes more than Thirty-Five Million Dollars ($35,000,000) to the area economy each year, and we wish to ensure that the proposed construction and operation of businesses in the Northeast Quadrant Specific Plan (NQSP) area, including this project, does not negatively impact the operations of this facility.

The primary concern generated by the Flying J Travel Plaza project is increased traffic. Campbell is concerned that the cumulative effects of this project, the proposed Dixon Downs project and other development in the area will interfere with truck traffic entering and leaving the plant, which during the processing season amounts to approximately 600 tractor-trailers a day arriving and departing at all hours. The primary route for this highly perishable crop is Pedrick Road from the Interstate 80 interchange to the facility entrance. Currently, the intersections of I-80 EB Ramps / Pedrick Road and I-80 WB Ramps / Pedrick Road operate at Levels of Service A or B at all times of the day.

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The DEIR indicates that the Flying J project would be expected to generate 224 inbound and 227 outbound total trips during the weekday AM peak traffic hour, and 194 inbound and 198 outbound total trips during the weekday PM peak traffic hour. While these trips may not be new to the freeway system, the impact to the I-80/Pedrick Road interchange is significant due to the volume of traffic expected to be diverted. The DEIR indicates that the Level of Service to the intersections referenced above will be reduced to C-, however, we believe that this is an overly optimistic evaluation. Attached is a letter from Mahesh Sukumar of Omni Means, dated October 3, 2006, which concludes that it is likely that safety concerns will arise at the Pedrick Road /I-80 ramp intersections due to the large volume of trucks turning onto and off from Pedrick Road. Section 4.10.2.5 of the DEIR acknowledges that a field observation of the traffic through the stop controlled approaches to both Pedrick Road ramp intersections revealed intermittent delays beyond theoretical levels projected by the LOS calculations. Therefore, we believe that the actual Levels of Service at these intersections will fall to LOS D, an unacceptable level. Contrary to the determination under Impact 4.10-1, mitigation should be required for this impact, so that existing Levels of Service are maintained. Furthermore, it is important that funding sources be identified for necessary improvements along with a schedule for constructing the improvements. 1

The DEIR acknowledges the safety concerns associated with the increase in large, slow-moving truck traffic. Of particular concern is the fact that trucks block sight distances. No detailed geometric review is included in the DEIR about sight distance deficiencies associated with the Pedrick Road / I-80 ramp intersections. 2

The DEIR for this project states that Pedrick Road is to be widened to accommodate development at this site. While the widening of this roadway is a favorable outcome, Campbell is concerned that this construction occur in a time and manner that does not impede the free flow of truck traffic from the Interstate 80/Pedrick Road interchange, especially during the tomato harvest season. 3

Water supply and water quality are two additional factors that are critical to the operation of Campbell's Dixon facility. Campbell has three wells on site that are all needed to maintain the full production capacity of this plant. Two additional wells are to be drilled in the NQSP area as part of the City's Master Water Plan, one of which is described as a "high-volume deep well facility." This project includes uses that require a high volume of water such as restaurants, showers and vehicle washing. The Dixon Downs project contains other water-intensive uses. Campbell is concerned that the cumulative effects of this project, the proposed Dixon Downs project and other development in the area will negatively impact the supply and quality of the water at its facility. The DEIR does not thoroughly evaluate the current condition of the 4

groundwater aquifer in this area, the current depth of the groundwater supply, projected cumulative growth in water usage, or the long-term impacts on existing wells.

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Thank you for the opportunity to provide these comments, and if you have any questions, please contact me.

Very truly yours,

Steven P. Rudolph

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Campbell Soup Supply Company, LLC
6200 Franklin Boulevard
Sacramento, CA 95824

(all via email)

961472v1 05233/0008

3.3.7 Letter 7: McDonough Holland & Allen, PC, October 5, 2006

Letter 7, Comment 1

A traffic study was prepared for the project and is appended to as **Appendix 4.10** in the DEIR. Page 4.10-11 of the DEIR includes a summary of the baseline conditions used for the traffic analysis prepared for the project. Specifically, "counts for Flying J were conducted in the early fall harvest season when trucking activity was at a peak for agricultural operations in the immediate area, notably, the Campbell Soup canning plant was at peak season operation." As discussed on page 4.10-20, **Subsection 4.10.5.1 Impact Analysis Methodologies**, of the DEIR, seasonal adjustments were made to the traffic counts to account for the higher agricultural trucking and passenger car volumes. The impact analysis methodologies described in the traffic study (and summarized in the DEIR) were found acceptable to the City of Dixon, and neither the City of Dixon nor Caltrans reviewers requested revision to the level of service analysis. Furthermore, the significance criteria, listed under **Subsection 4.10.5.2**, Significance Criteria on page 4.10-23 of the DEIR, are based on standards established by the City of Dixon and the Solano Transportation Authority (STA). Using these standards and the approved methodology, **Impact 4.10-1** (page 4.10-24 through 26) found that development of the project would not result in unacceptable levels of services at existing intersections in the project vicinity, including the intersections at Pedrick Road and Interstate 80 (Eastbound and Westbound) Ramps. Based on factual data and substantial evidence as shown in **Section 4.10** of this document, **Impact 4.10-1** presents the conclusion that the project would result in less-than-significant impacts to level of service at intersections in the project vicinity under existing conditions.

Letter 7, Comment 2

As part of project improvements, it is expected that Caltrans would conduct a Project Study Report (PSR) that would include a detailed description of I-80 ramps improvements that would serve the project site. As part of this process, Caltrans would consider all observable safety hazards through the preparation of necessary environmental documents (e.g., Mitigated Negative Declaration, Environmental Assessment, etc.). Under the purview of CEQA, **Impact 4.10-4** on page 4.10-27 of the DEIR addresses safety concerns associated with sight line

blockage for the proposed access roads to the project site. As discussed, sight lines would be blocked for vehicles turning into and out of the project site from Pedrick Road and Professional Drive access points. Mitigation measures include provisions to prohibit on-street parking near the project site, in addition to contribution of fair-share payment for Interstate 80 / Pedrick Road interchange improvements.

Letter 7, Comment 3

As stated on page 4.10-24 of the DEIR, a four-lane (approximately 84-foot wide) segment of Professional Drive would be constructed as part of the project, creating a new intersection with Pedrick Road adjacent to the southeast corner of the site, which would be stop sign controlled on the Professional Drive approach to Pedrick Road. Pedrick Road would be widened to provide northbound and southbound deceleration lanes serving the access point intersecting Pedrick Road, as well as northbound and southbound deceleration lanes on the approaches to the (new) Professional Drive intersection. It is understood that during construction of improvements to Pedrick Road and the I-80 interchange, Campbell's requested no impedance to the free flow of truck traffic to and from its facility and the Pedrick Road/I-80 interchange, especially during harvest season. It is standard practice to develop traffic control measures prior to construction. These measures would be developed and approved by the City's traffic engineer prior to the issuance of building permits. The objective of the traffic control measure would be to maintain a free flow of truck traffic along Pedrick Road, including trucks traveling to and from the Campbell plant. The public and nearby businesses to the project site will have opportunity to voice concerns over any construction project.

Letter 7, Comment 4

The DEIR relied on the Water Supply Assessment (WSA) prepared for the NQSP, prepared by the Dixon-Solano Municipal Water Service (DSMWS) (December 24, 2003). The report presented the conclusion that all present and future water deliveries could be provided by existing groundwater resources. The report estimated that by 2024, the water demand in this area is estimated to be approximately 7,500 acre-feet per year and assuming that new water supply facilities (e.g. wells, distribution, etc.) were constructed as development occurs,

there would be sufficient groundwater available to meet the water demands of new development.

The report states that the groundwater basin, used by DSMWS, is not in an overdraft condition and can provide enough water without exceeding its safe yield to serve the development proposed for the remainder of the DSMWS service area that is outlined in its Water Master Plan, which includes the Northeast Quadrant.

The WSA prepared for the NQSP included future water demands for the NQSP, based on land use zoning and assumed growth rates for development of those land uses. The intensity of land use proposed by the project would be consistent with land use classifications under the NQSP, and therefore the WSA. The Campbell Facility, which is in the service area of DSMWS, was considered in the existing conditions for the WSA. The determination of water supply for the proposed project under existing and future conditions is therefore adequately addressed in the document. **Impact 4.11-1** concludes that the DSMWS does not have adequate water supply or water facilities to serve the project, in addition to other development in the project area. Mitigation proposed for this impact would require the applicant to contribute funds to construct a new water supply facility. Also, since publication of the DEIR, the DSMWS has changed its standards to require an additional 1-million-gallon storage tank which would double the storage capacity described in the DEIR. With construction of water supply facilities prior to development of the project, the project and other future development are not expected to substantially deplete the groundwater resources in the project area.

Letter No. 8

omni·means
BUSINESS · PLANNERS

October 03, 2006

Steven P. Rudolph
MHA
555 Capital Mall, 9th Floor
Sacramento, CA 95814

RE: Feedback and Comments on Flying J. Travel Plaza DEIR

Dear Steve:

OMNI-MEANS appreciates the opportunity to continue providing feedback and additional comments on the Flying J. Travel Plaza DEIR in respect to the existing Campbell's Soup Supply Company LLC Canning Facility located on east side of Pedrick Road just north of the Union Pacific railroad tracks.

The Flying J. Travel Plaza DEIR was prepared in August 2006 and contained within its Transportation & Circulation Chapter, a detailed evaluation (*by Crane Transportation Group*) of traffic impacts including mitigations for significant impacts to the I-80/Pedrick Road interchange, and relevant study intersections. This letter comments on specific issues within the Traffic and Circulation section within the EIR

Comments

1) Based on the 2000 HCM manual, adjustments for heavy-vehicles must be made using appropriate Passenger Car Equivalents (PCE's). Traffic analysis softwares often use an alternate approach wherein actually heavy vehicle percentages are entered to account for trucks and RV's. Although the DEIR states the appropriate truck percentages and accounts for them by adjusting counts, it is expected that traffic impacts will be greater using a PCE approach. If impacts using appropriate PCE's are found to be greater than those currently reported, such impacts must be included within the DEIR. 1

2) Even if traffic impacts (intersection LOS) are found to be less than significant using a PCE approach, it is likely that safety concerns will arise at the Pedrick Road/I-80 ramp intersections due to the large volume of trucks turning onto and off from Pedrick Road. Section 4.10.2.5 within the DEIR acknowledges that a field observation of the traffic through the stop controlled approaches to both Pedrick Road ramp intersections revealed intermittent delays beyond theoretical levels projected by LOS calculations. 2

   The DEIR within its mitigation section acknowledges these safety concerns due to reduced sight-distances and on-street parking, and states that the project applicant proposes to widen Pedrick Road to provide northbound and southbound deceleration lanes in addition to a divided median. However no detailed geometric review is included about sight distance deficiencies associated with the Pedrick Road/I-80 ramp intersections.

3) Although the project will pay its fair-share contribution to the Pedrick Road/I-80 interchange, the interim period between construction of the project and eventual improvements to the interchange will witness significant traffic impacts. These impacts will affect the timely delivery of produce to the Campbell's Soup Company. 3

943 Reserve Drive, Suite 100 • Roseville, CA 95678 • (916) 782-8688 fax (916) 782-8689
ROSEVILLE REDDING VISALIA WALNUT CREEK

The project applicant must coordinate with Caltrans and the City of Dixon in preparing design plans which will eventually form the PSR/PR documents for the I-80/Pedrick Road interchange improvements. Such interchange PSR/PR and PS&E documents must be completed and approved by Caltrans prior to the start of construction. If necessary the project must coordinate with Caltrans and concerned agencies in developing advance fund mechanisms to ensure that appropriate interchange improvements are completed in a timely manner, thus not interfering with delivery of produce to the Campbell's Soup Supply Company.

3

3) Since as acknowledged within the DEIR, computed LOS values often project a lesser impact than field observations, it is necessary for the DEIR to include results from an actual micro simulation of traffic operations at the Pedrick Road/I-80 ramp intersections. Such results should include in addition to intersection LOS, other operational parameters like arterial segment LOS along Pedrick Road, 95th percentile queues along the intersection approaches.

4

Sincerely,

OMNI-MEANS, Ltd.
Engineers & Planners

Mahesh Sukumar

Cc: Steve Rudolph (srudolph@urbanx.com)
Paul Miller (pmiller@omnimeans.com)

MS
C988u005.doc

3.3.8 Letter 8: OMNI-MEANS, Ltd., October 3, 2006

Letter 8, Comment 1

The opinion stated in Letter 8 is respectfully acknowledged. As discussed on page 4.10-20, **Subsection 4.10.5.1 Impact Analysis Methodologies**, seasonal adjustments were made to the traffic counts to account for the higher agricultural trucking and passenger car volumes. The impact analysis methodologies described were found acceptable to the City of Dixon, and neither the City of Dixon nor Caltrans reviewers requested revision to the level of service analysis. As a result, no further changes were made to these portions of the analysis. Furthermore, the significance criteria, listed under **Subsection 4.10.5.2**, Significance Criteria on page 4.10-23 of the DEIR, are based on standards established by the City of Dixon and the Solano Transportation Authority (STA). Using these standards and the approved methodology, **Impact 4.10-1** (page 4.10-24 through 26) found that development of the project would not result in unacceptable levels of services at existing intersections in the project vicinity, including the intersections at Pedrick Road and Interstate 80 (Eastbound and Westbound) Ramps. Based on factual data and substantial evidence as shown in **Section 4.10** of this document, **Impact 4.10-1** presents the conclusion that the project would result in less-than-significant impacts to level of service at intersections in the project vicinity under existing conditions.

Letter 8, Comment 2

Comment 2 is respectfully acknowledged. A detailed geometric review is not required by the City of Dixon or Caltrans.

Letter 8, Comment 3

As stated on page 4.10-24 of the DEIR, development of the project would not result in unacceptable levels at existing intersections in the vicinity of the project, including the I-80 eastbound and westbound ramps under near-term conditions. However, the DEIR identifies a significant and unavoidable impact to existing intersections under future background conditions as stated on page 4.10-35. Therefore, the commenter is correct in that until the Pedrick Road/I-80 interchange is constructed, the project combined with buildout of the NQSP area would result in significant traffic impacts.

Letter 8, Comment 4

This information regarding standard procedures for design, reporting and review of improvements to Caltrans facilities is acknowledged.

Letter 8, Comment 5

Comment 5 is respectfully acknowledged. The methodology provided in the EIR traffic analysis was found acceptable to the City of Dixon, and neither the City of Dixon nor Caltrans reviewers requested micro simulation of traffic operations at the I-80/Pedrick Road interchange as part of the EIR traffic evaluation of the Flying J project. As a result, no further changes were made to this portion of the analysis.

Letter No. 9

Linda R. Sikes
525 Peterson Lane
Dixon, CA 95620-2643

RECEIVED
OCT 27 2006
CITY OF DIXON

October 26, 2006

David Dowswell
Community Development Director
City of Dixon
600 East A Street
Dixon, CA 95620

RE: Flying J Travel Plaza DEIR

Dear Mr. Dowswell:

Thank you for inviting Dixon residents to comment on the Flying J Travel Plaza DEIR. I understand that the City Council extended the October 16, 2006 deadline for written commentary into November.

Traffic on Interstate 80 is a major concern. Combined with existing vehicular traffic to and from Campbell Soup and expected vehicular traffic to and from Dixon Downs, anticipated vehicular traffic to and from Flying J could worsen an already congested freeway. 1

The expected rezoning of the northeast quadrant allows for the kinds of development the Dixon Downs Project proposes in its Phase II. How compatible will a truck stop be with high-end retail and upscale restaurants? 2

Sincerely,

Linda R. Sikes

Linda R. Sikes

3.3.9 Letter 9: Linda R. Sikes, October 26, 2006

Letter 9, Comments 1 and 2

A comprehensive traffic study was prepared for the Flying J Travel Plaza project. The traffic study considers existing traffic (e.g., vehicular traffic associated with the Campbell Soup facility), project-related traffic, and projected traffic from future development. The traffic study is incorporated into **Section 4.10, Traffic and Circulation** and is appended in its entirety as **Appendix 4.10** of the DEIR**.** As described in the DEIR, the project would result in significant impacts that cannot be mitigated to less-than-significant levels. More specifically, development of the project would result in unacceptable levels of service at existing intersections in the vicinity of the project. Subsequent to the publication of the DEIR, the proposed Dixon Downs project was rejected by the City of Dixon voters. However, it is anticipated that the Dixon Downs project site will be developed according to the land use designations in the approved NQSP. As detailed in **Chapter 4.0** of this document, development under the NQSP would result in fewer trips than development of the Dixon Downs project. Accordingly, the cumulative analysis conducted for the DEIR is considered a worse-case scenario. Further consideration of the Dixon Downs project is not necessary.

Letter No. 10

October 16, 2006

Mr. David Dowswell
Community Development Director
City of Dixon
600 East A Street
Dixon, CA 95620

Dear Mr. Dowswell:

The following are our comments in response to the Flying J Truck Plaza DEIR. We are neighbors to this project and have taken every opportunity for public comment on all CEQA actions undertaken by the City of Dixon or the Flying J proponents relative to this proposed project over the past ten years. We have met with various Flying J project representatives at their request over these last ten years.

We request notification of all CEQA actions for this project.

BIOLOGICAL RESOURCES

Swainson's Hawk

The EIR must include a map of all Swainson's Hawk nest sites. It is not enough to say that there are four nests located within a mile. We need to know that all nest sites are included, and we also need to know exactly how close those nests are to the proposed project area. From the information provided in the DEIR, we do not know if any nesting sites are close enough to the proposed project area for disturbance of nesting pairs to occur . 1

TRAFFIC AND CIRCULATION

In 1997, the City of Dixon prepared a very lengthy Negative Declaration for one of the earlier incarnations of the Flying J. The project was named Big West Commercial Park and was located across Pedrick Road from where the Flying J is currently proposed. It was basically the same truck stop as is being discussed here, with the same applicant. The following is an excerpt from the "Traffic Study for the Flying J Travel Plaza in Dixon California," prepared for PDG, Inc., prepared by Fehr & Peers Associates, Inc., May 12, 1997. 2

"*Intersection Design*

City of Dixon staff noted that some large trucks have difficulty completing turns at the Pedrick Road/I-80 Westbound Ramps intersection. Specifically, City staff cited several reports of trucks that turned left from the westbound off-ramp and crossed into the northbound left-turn lane on

Pedrick Road. Fehr & Peers conducted a site visit and obtained geometric data at this intersection. Figure 3 illustrates this existing design deficiency by showing the lane layout and the path of a typical semi-trailer truck (i.e., a WB 50 design vehicle).

To provide an adequate turning radius, the existing intersection should be modified. Removal of approximately 10 feet of the median island in the southwest quadrant of the intersection will provide adequate width for a WB 50 design vehicle. A schematic representation of the proposed improvement is shown on Figure 4.

As part of this improvement, an existing light pole and stop sign must be relocated to the west. In addition, the stop bar for eastbound traffic must be moved approximately 10 feet west. Since removal of part of the median will widen the southbound departure lane, a yield sign should also be interlude for eastbound traffic turning right at this location. This sign will better designate right-of-way at this junction.

2

We have attached the referenced Figures 3 and 4 to this letter, so that the proposed intersection improvement is documented. This improvement was never done because the project was not approved.

LAND USE

We have a copy of a memo written by the then City of Dixon Public Works Director, Ron Tribbett, in which he expressed concern that trucks will park across Pedrick Road on the east side, either by design or by default. The east side of Pedrick contains a large parcel of land that is also owned by Flying J and is in agricultural use.

3

AIR QUALITY

The Northeast Quadrant Specific Plan EIR did not address the environmental effects from exhaust from idling or moving heavy duty diesel trucks. We do not think that the issue is addressed as fully as it should be in this DEIR. Several "possible" mitigation measures are discussed, but not agreed to. If the "possible" mitigation measures are not actually under consideration, why are they in the DEIR?

4

We would like Air Quality Impact 4.3-2, to be separated into two or more parts. The stationary gas dispensing and storage equipment impact should be separated from the impacts of air pollution from diesel exhaust generated by idling trucks and refrigerated trailers. Further information is needed about what will be done to curtail engine idling at the proposed Flying J. We want more information about "off-board power infrastructure," which the Flying J said it would install when it came before the City of Dixon with the Big West Commercial Park Project. In the Negative Declaration for that project, see the Draft Findings of Fact and Mitigation Monitoring Program, PD 95-2, Big West Commercial Park, Sept. 30, 1997. It reads as follows:

5

6

Impact: The diesel exhaust from trucks and refrigerated trailers idling their engines each night at the truck stop will generate air pollution not addressed in the mobile source emissions evaluated in the NQSP EIR.

Project Specific Mitigation Measure AQ-AA: The project applicant shall install electrical hookups for diesel trucks to provide overnight power for refrigerated trailers.

Finding: Mitigation Measure Feasible and Required. the City finds that project specific mitigation measure AQ-AA is feasible and will reduce the impact to a less-than-significant level by eliminating the need for trucks to idle their engines during nightly layovers.

6

We have attached a copy of this page, also.

Thank you for the opportunity to comment on the DEIR. These are our concerns at the present time. Please call us at 707-678-5705 if you have any questions.

Sincerely,

Skip and Jill Simmons

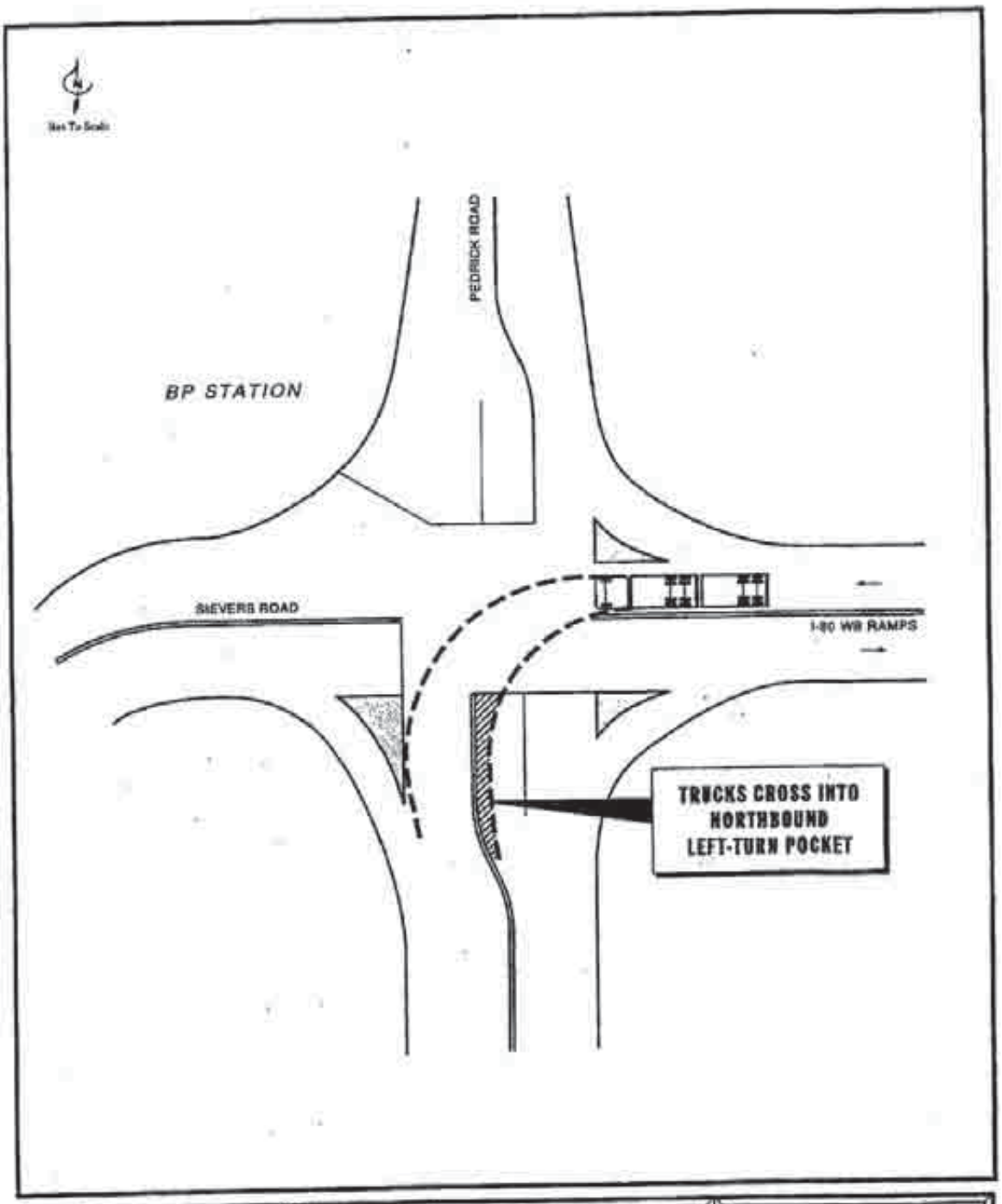

FIGURE 3 — **EXISTING PEDRICK ROAD / I-80 WESTBOUND RAMPS INTERSECTION DESIGN** — Fehr & Peers Associates, Inc. Transportation Consultants

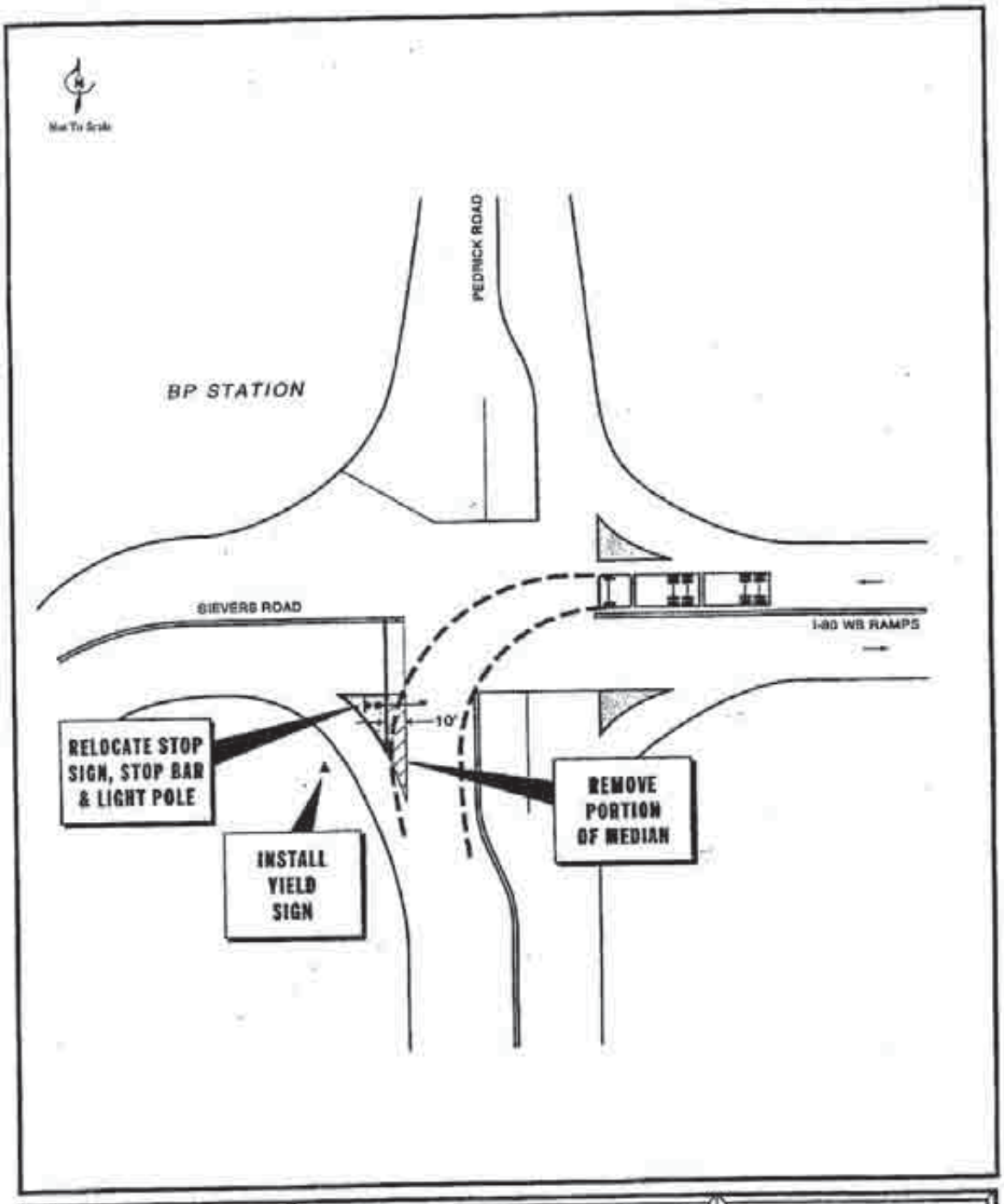

FIGURE 4	PROPOSED INTERSECTION IMPROVEMENT	Fehr & Peers Associates, Inc. Transportation Consultants

In addition to this project specific mitigation measure, see the applicable adopted mitigation measures LU-A through LU-C of the NQSP EIR presented in the accompanying Additional Information document.

AIR QUALITY

Impact: The diesel exhaust from trucks and refrigerated trailers idling their engines each night at the truck stop will generate air pollution not addressed in the mobile source emissions evaluated in the NQSP EIR.

Project Specific Mitigation Measure AQ-AA: The project applicant shall install electrical hookups for diesel trucks to provide overnight power for refrigerated trailers.

Finding: Mitigation Measure Feasible and Required. The City finds that project specific mitigation measure AQ-AA is feasible and will reduce the impact to a less-than-significant level by eliminating the need for trucks to idle their engines during nightly layover's.

Implementation:	Applicant/CA State Air Resources Board
Monitoring:	City Building Department/CA State Air Resources Board

Impact: The gas dispensing and storage equipment associated with the truck stop may generate air pollution not addressed in the NQSP EIR.

Project Specific Mitigation Measure AQ-BB: The applicant shall obtain an Authority to Construct Permit for all gas dispensing and storage equipment from the Yolo/Solano Air Quality Maintenance District (Y/SAQMD).

Finding: Mitigation Measure Feasible and Required. The City finds that project specific mitigation measure AQ-BB is feasible and will reduce the impact to a less-than-significant level by providing standard control measures for gas dispensing and storage equipment.

Implementation:	City Building Department/ Yolo/Solano AQMD
Monitoring:	City Building Department/ Yolo/Solano AQMD

In addition to these project specific mitigation measures, see the applicable adopted mitigation measures AQ-A through AQ-L, AQ-R, AQ-S, and AQ-U of the NQSP EIR presented in the accompanying Additional Information document.

BIOLOGICAL RESOURCES

Impact: Project may cause a disturbance to potential Swainson's hawk foraging habitat.

Project Specific Mitigation Measure: There are no further mitigation measures required for this potential impact.

Finding: No Further Mitigation Measures Required. The City finds that there are no further mitigation measures required for the disturbance to potential Swainson's hawk foraging habitat. The field inspection required by the NQSP EIR was completed on May 28, 1997. No Swainson's hawk were observed. A County-wide Habitat Management Plan for Solano County

3.10.3 Letter 10: Skip and Jill Simmons, October 16, 2006

Letter 10, Comment 1

As discussed in the DEIR (page 4.4-8), the California Natural Diversity Data Base (CNDDB) includes 57 nesting occurrences for Swainson's hawk within a 5-mile radius of the project site, including four nest sites within 1 mile of the site. The closest of these documented Swainson's hawk nest sites was historically located approximately 185 feet east of the project boundary, on the east side of Pedrick Road (CNDDB Occurrence # 389).

According to the CNDDB, all of the trees at this location were removed prior to 2000; consequently, Swainson's hawk is not expected to currently nest at the location. The other documented Swainson's hawk nests are greater than 2,300 feet from the project boundaries, and are not expected to be adversely affected by project-related construction noise.

The DEIR (**Mitigation Measure 4.4-1a** on page 4.4-20 of the DEIR) requires that preconstruction nesting bird surveys be conducted. If active bird nests are found, clearing and construction within 300 feet of the nest (500 feet for raptors) is prohibited until the nest is vacated and juveniles have fledged. This measure would prevent disturbance to currently undocumented Swainson's hawk nests that could be established near the project site prior to commencement of the proposed project.

Letter 10, Comment 2

Information regarding the 1997 Negative Declaration for Big West Commercial Park (formerly proposed on the Flying J project site) is useful, and should be considered in the City/Caltrans review of design plans for the Pedrick Road/I-80 Interchange improvements. As part of project improvements, it is expected that Caltrans would conduct a PSR that would include detailed description of I-80 ramps that would serve the project site. Caltrans would consider all observable safety hazards as part of this analysis and future designs for the interchange over-crossing and intersection improvements would need to accommodate all large truck turning movements. Under the purview of CEQA, **Impact 4.10-4** on page 4.10-27 of the DEIR addresses safety concerns associated with the safety hazards associated with sight line blockage for the proposed access roads to the

project site. As discussed, sight lines would be blocked for vehicles turning into and out of the project site from Pedrick Road and Professional Drive access points. Mitigation measures include provisions to prohibit on-street parking near the project site, in addition to contribution of fair-share payment for Interstate 80 / Pedrick Road interchange improvements.

Letter 10, Comment 3

As detailed on page 3.0-5 of the DEIR, the project would include 221 truck parking spaces at the project site. Implementation of **Mitigation Measure 4.10-4b** would prohibit on-street parking along the project's Pedrick Road frontage (west side of the street) between the I-80 freeway and Professional Way, and along the north side of Professional Drive (just west of Pedrick Road). According to the City's *Engineering Design Standards*, no parking is allowed on either side of Pedrick Road since it is an arterial roadway. Additionally, City Staff will recommend to City Council to adopt a resolution establishing a "No Parking" zone on either side of Pedrick Road before the project is built to eliminate the potential for trucks to park on the east side of Pedrick Road.

Letter 10, Comment 4

Possible mitigation measures are evaluated in the DEIR because the Yolo-Solano Air Quality Management District (YSAQMD) commented in response to the Notice of Preparation that such measures should be evaluated in the DEIR. As indicated in response to Letter 6, Comments 15 and 16, the text in the DEIR has been revised to clarify the inclusion of these control measures as recommended as mitigation measures. These changes are reflected in **Chapter 4.0** of this document.

Letter 10, Comment 5

It is not clear why the commenter wants to separate the discussions of the air quality impacts of gasoline dispensing and storage equipment and idling trucks and refrigerated trailers. Emissions from both of these sources are related to the project's operation. Those emissions must be combined and compared to the YSAQMD's thresholds of significance. Nonetheless, emissions resulting from these activities are shown as separate entries in tables summarizing the sources of pollutant emissions in the following tables of the DEIR: **Table 4.3-11,**

Stationary and Area Source Operational Emissions on page 4.3-33; **Table 4.3-13, On-Site Traveling Emissions at Flying J Travel Plaza** on page 4.3-36; **Table 4.3-14, Running Emissions From Truck Engine, TRU, and APU** on page 4.3-40; and **Table 4.3-15, Total Daily Operational Emissions for Flying J Travel Plaza** on page 4.3-41.

Letter 10, Comment 6

As stated in the DEIR, and required by an ATCM adopted by the ARB, truck engines will not be allowed to idle for more than five minutes. Thus, truck engine idling will be highly limited. The commenter identifies a previous project, Big West Commercial Park, (September 1997) for which the commenter contends that Flying J indicated they would install "off-board power infrastructure" when they came before the Dixon City Council regarding the Big West Commercial Park Project. It should be noted that the operation of truck stops in the late 1990s and the regulations governing their operation are different than today. In the late 1990s, idling of truck engines to provide comfort heating and cooling would have been unrestricted by any state or local regulations. Furthermore, there were no regulations requiring low-emission retrofits of transport refrigeration units (TRUs). For the current project, there are several conditions that would limit the project emissions:

- Flying J has committed to operate the proposed Travel Plaza as a "no-idle" facility;
- The ARB has adopted an ATCM that will require low- and ultra-low-emission retrofits of all TRUs operating in California; and
- The ARB has adopted an ATCM that further restricts unnecessary idling of commercial heavy-duty trucks at truck stops and other locations.

Accordingly, the unmitigated emissions from the previous project (Big West Commercial Park) would have been substantially higher than those associated with the proposed project considered in the DEIR and the cost-effectiveness of an off-board power infrastructure system may have been more favorable. However, for the proposed project, truck idling emissions only consist of a fraction of the operational emissions of the proposed facility.

Letter No. 11

Michael Smith
Councilmember, City of Dixon
Contact: via City of Dixon, mikesmith@onramp113.com

October 1, 2006

Comments on Flying J Draft EIR

Looking at the appendixes of the report, peak hour volumes and the trips for on site for air quality show an estimated 595 medium to heavy trucks trips on site. The tables show emissions at 25 and 10 mph. No where do I see the impact on air quality for these trucks to start engines, accelerate from the many stop and starting points accessing the project or the interstate. Please show the air quality impact from these vehicles as they work from a standing stop to up to speed. We all can see and smell the thick black smoke from the stacks as these trucks labor on the interstate and climb the overpasses. 1

With the above 595 trips added to the 1297 trips noted from the freeway the report projects 1892 trips. No mitigation for widening to Pedrick Road and the ramps are noted.

- Regardless of the signalization, does the traffic impact take into account the require time heavy trucks need to climb the overpass? 2
- Does it take into account passenger vehicles that would stack behind these trucks with no passing lane? I question this as someone that commutes on HWY 12 to Napa via I80. All it takes is one vehicle to cut in front of a big rig causing it to stop at the base of the incline to HWY 12 off ramp from I80 to start backing up traffic. 3
- Additionally, as to stacking, no modification to I80 is show for deceleration or acceleration for the heavy volume of trucks at peak hours. 4
- There is some confusion with the data on page 4.10-21 (which states 80% of the traffic would be diverted – which is how much?) and table 4.10-5 (which shows about 200 total trips - 25-77 heavy trucks) and air quality emission calculations for on-site motor vehicle emissions (10 mph) (showing the 595 total medium to heavy trucks). What is the real count for **this** project for each class of truck? 5
- Where does the traffic study take into account the impacts to Pedrick Road and the ramps during harvest season? 6
- How do these projected traffic counts compare to the actual of the Flying J on I5 and HWY 12 in the central valley? Please provide counts from that facility. 7
- How does the truck traffic on I5 compare to I80? Which has more and how much is the diversion? 8

Report states project would not result in a substantial increase in calls for service by Dixon PD. Since the FBI* and DEA** both report that truck stops are a source 9

for trafficking drugs and prostitution with have connections to organized crime, why did the report not address the crime potential with these two agencies and the Solano County Sheriffs Department? I request you include these three agencies for comments and have them for the Final EIR. 9

Report states project would not result in a substantial increase in calls for service by Dixon FD. I was told that entering and exiting the interstate is the high risk area for having an accident. Adding an additional 595 trips by medium to heavy truck entering and exiting the interstate must have an effect on accident rate. Please provide the data to support statement that the project would not result in a substantial increase in calls for service by Dixon FD. As noted above with the personal observations of HWY 12 west to Napa from I80, such congestion has resulted in many accidents and one recent event in that a number of people were killed. 10

I was informed that homes built near the CHP truck inspection station on I80 in Fairfield must disclose to the homebuyers the health risks the station presents. I also read about homeowners living in Oakland and in Southern California had proved impacts to air quality due to heavy truck traffic caused by the ports in Oakland and in Southern California that was previously dismissed "on paper". Those homes are further away then the projected area of health impacts shown for this project. 11

- Why is this project different? 12
- Can you show the relationship between trucks entering and exiting the scales and the ports as compared to this project? 13
- Why is their no mitigation or notices for the existing business operations and homeowners?
- Per Prop. 65: *"25249.6. Required Warning Before Exposure To Chemicals Known to Cause Cancer Or Reproductive Toxicity. No person in the course of doing business shall knowingly and intentionally expose any individual to a chemical known to the state to cause cancer or reproductive toxicity without first giving clear and reasonable warning to such individual, except as provided in Section 25249.10."* Would notices need to be posted on the interstate to warn people that exiting for the project would expose them to increased health impacts shown in this report? 14
- Where the health risks based on the data of trucks traveling at 25 and 10 mph as discussed above – without calculations to start engines, accelerate from the many stop and starting points? If so, and there is an impact from such, please revise the report. 15
- What is the health risk to horses and cattle?

Appendix 1, page 11, interested public agencies, missing from this list is the Solano Transportation Agency, The City of Davis (*they like to comment on big Dixon projects*) and any farm or grower associations representing the area's agricultural industry. 16

Flying J held community meetings before the scoping meeting. The one I attended had many concerns raised on the negative impacts – some not covered in detail in the report. Why where the notes taken on those concerns not presented in this report?

16

*FBI web site:
http://www.fbi.gov/congress/congress05/swecker060705.htm
"The Oklahoma City Division conducted a large-scale child prostitution investigation focused on the interstate prostitution of children at truck stops and through call services nationwide in an investigation named, STORMY NIGHTS."

http://www.fbi.gov/page2/july06/career_konstas071406.htm
*"Q. Jamie, can you describe a case you've worked on?
Jamie: Sure. I recently worked on a major child prostitution investigation called "Precious Cargo," which centered on sex trafficking in Pennsylvania, but reached as far away as Florida, Michigan, and Oklahoma. We had intelligence that showed Harrisburg was a hub for trafficking and that minors and adult victims were being prostituted at truck stops."*

**DEA web site:
http://www.usdoj.gov/dea/pubs/pressrel/pr092106a.html
News Release, September 21, 2006
""Residents of the North Shore should not have to live with drug dealers operating in their communities - brazenly conducting their drug deals in mall parking lots and truck stops," stated U.S. Attorney Sullivan"

http://www.usdoj.gov/dea/pubs/cngrtest/ct040506_attach.html
"DEA has removed a number of distributors of grey market drug products (those that can be purchased at truck stops, party/liquor stores, etc.) from the marketplace."

3.3.11 Letter 11: Michael Smith, Councilmember, October 1, 2006

Letter 11, Comment 1

The emission factors used in the DEIR, which are based on emission rates estimated by the ARB's motor vehicle emissions inventory model (EMFAC2002) for truck traveling speeds of 25 and 10 miles per hour (mph), incorporate a variety of mobile activities. These emission factors include activities such as cold starts, idling, and more. It should be noted that EMFAC2002 was developed by the ARB to estimate mobile source emission inventories, and it is the best available tool for estimating project-related mobile source emissions. Therefore, the variable operating scenarios identified by the commenter are included in the emission estimates. It should also be noted that the emissions were estimated for (1) daily periods for purposes of comparison with the YSAQMD's daily thresholds of significance and (2) annual periods for purposes of estimating the potential health impacts. Accordingly, there is no need to specifically address the air quality impacts due to the very brief periods when emissions from trucks would increase during startups and acceleration for the purpose of determining the significance of the project's air quality impacts.

Letter 11, Comment 2

The software analysis used to prepare the information in the traffic study (**Appendix 4.10** of the DEIR) provides the truck percentage of total traffic. This provides an average of total time for all vehicles – heavy trucks as well as passenger vehicles – to climb the overpass. The truck percentage used in this study is based upon actual (seasonal high) truck counts conducted for this study.

Letter 11, Comment 3

The software, based on year 2000 Transportation Research Board Highway Capacity Manual, provides averaged results, with truck percentages based upon harvest season vehicle classification counts conducted specifically for this study. It does not depict worst case experiences that drivers may have in this location, in that the program presents averages based upon total vehicle counts for the peak hour being analyzed. The software used is recognized as being in current, standard use, and is deemed acceptable by Caltrans and the City of Dixon. Furthermore, geometric analysis and design studies for improvements to the

Pedrick Road/I-80 interchange will consider both truck and passenger traffic needs for on- and off-ramps.

Letter 11, Comment 4

As part of its long-term capitol improvements program (CIP), the City of Dixon will cooperate with Caltrans in planning the reconstruction and widening of the I-80 over-crossing, including freeway on- and off-ramps (with needed acceleration and deceleration lanes on the approaches to the I-80 ramp intersections) and other needed intersection improvements.

Letter 11, Comment 5

As the commenter noted, approximately 80 percent of the trips generated by the proposed project would not be new to the freeway system. Therefore, approximately 179 inbound and 182 outbound total trips during the weekday AM peak hour, 155 inbound and 158 outbound total trips during the weekday PM peak traffic hour, and 156 inbound and 158 outbound total trips during the Saturday PM peak hour, would be diverted from the stream of existing traffic on the freeway.

The commenter incorrectly notes that **Table 4.10-5, Dixon Flying J Trip Generation,** on page 4.10-21 of the DEIR, shows that there are about 200 total trips by 25-77 heavy trucks. Instead, **Table 4.10-5** provides the number of inbound and outbound trips for AM and PM peak hours, not daily trips.

Impact 4.3-2 on page 4.3-33 of the DEIR describes methodology used to calculate mobile source emissions. The 595 total medium to heavy trucks noted by the commenter represents the total number of medium to heavy trucks per day. In order to calculate mobile source emissions, it was assumed that 3- and 4-axle trucks would be a mix of medium-duty and light-heavy-duty trucks and the 5-axle trucks would be heavy-heavy duty trucks. These classifications are based on the Air Resources Board's vehicle weight classifications. The emission factors were derived from EMFAC2002 motor vehicle emissions inventory program for these weight classes.

Table 1, Flying J Project Trip Generation (column 1) in **Appendix 3.0** of this document provides classification counts for all vehicles, including trucks by number of axles, conducted for this study. Since the proposed Flying J facility has not been constructed, real (actual) counts for the project are not available.

Letter 11, Comment 6

As noted on page 4.10-9 of the DEIR, traffic counts for baseline conditions were conducted during the early fall harvest season when trucking activity is at its peak. The entire traffic section provides analysis during harvest season conditions.

Letter 11, Comment 7

As indicated on page 4.10-20 of the DEIR, the traffic counts were conducted at the Flying J truck stop in Ripon, California because it is similar in size and range of services as the proposed project. Therefore, it was not necessary to take traffic counts at other Flying J truck stops, including the facility on Interstate 5 and Highway 12 in the Central Valley. As shown in **Appendix 3.0, Traffic,** in this document **Table 1** provides counts from the Ripon Flying J facility

Letter 11, Comment 8

The Interstate 5 and I-80 volumes are compared in **Appendix 4.10** of the DEIR under Table 1. Truck stops located along major freeways derive their largest percentages of trips from freeway traffic passing the sites. The Ripon Flying J, where count data was collected, is located adjacent to State Route 99, while the proposed project is located adjacent to the I-80 freeway. These freeways have different mixes of autos and trucks, which influence traffic volumes entering and leaving facilities such as Flying J truck stops. To more accurately apply the results of trip generation counts from the Ripon facility to the project site, adjustments were made, based upon vehicle mix data available from Caltrans: Annual Average Daily Truck Traffic on the California State Highway System, State of California Department of Transportation, April 2004. The "-14 percent" reduction for large trucks is a conservatively low based upon Caltrans count data.

Letter 11, Comment 9

In California Highway Patrol (CHP) truck inspection stations, heavy-duty trucks are usually traveling at low speeds (around 3 to 5 mph) and/or idling, sometimes for extended periods of time depending on the amount of trucks at the station. According to CHP staff at the Fairfield inspection station, approximately 10,000 to 12,000 heavy-duty trucks pass through the inspection station on a daily basis, compared to 540 heavy-duty trucks per day for the proposed project. Diesel trucks operating at low speeds at the truck inspection station would generate more air emissions than if running at more efficient highway speeds. The aggregation of trucks varying in model year and maintenance level also leads to high concentrations of air pollutants in the vicinity of inspection stations. The proposed project would cater toward truck drivers parking their vehicles to use the facilities (e.g., shower, restaurant, laundry, and entertainment). In addition, trucks at inspection stations are considered in operation; therefore, the ATCM to limit idling to less than five minutes would not apply to those trucks.

At ports, various other types of diesel equipment such as forklifts, loaders, cranes, and other heavy-duty moving equipment would be present. These vehicles, in addition to the ship engines, would be in constant operation; therefore, they could be operating at low speeds and idling while waiting for cargo to process. The magnitude and types of diesel equipment operating at a port such as Oakland, Los Angeles, or Long Beach would greatly exceed that of the proposed project. For comparison, a health risk assessment of diesel particulate matter (DPM) emissions associated with the operation of the Ports of Los Angeles and Long Beach reported emissions of 965 tons per year for the Port of Los Angeles and 795 tons per year for the Port of Long Beach. In contrast, the estimated DPM emissions for the proposed project are on the order of 1 to 2 tons per year.

Letter 11, Comment 10

Trucks entering and exiting the scales at an inspection station would include emissions during idling and lower operating speeds. Depending on the volume of trucks at the inspection station, trucks would be forced to idle for longer periods or travel at slower speeds while queued. In relation to the proposed project, trucks would come on site and park. Some trucks may idle for five

minutes; however, any idling longer than five minutes would be strictly prohibited at the proposed project. Idling of most trucks operating at a port during cargo loading would similarly be restricted to no longer than five minutes due to the ATCM for truck idling.

Letter 11, Comment 11

If the project is approved and constructed, Flying J would be responsible for complying with all applicable air quality and other environmental requirements, including Proposition 65 (the Safe Drinking Water and Toxic Enforcement Act of 1986). If Flying J determines, based on actual operation of the Travel Plaza, that the warning requirements of Proposition 65 are triggered, then it may provide warnings (notices) using any of several methods allowed by the implementing regulations for the Act (California Code of Regulations, Title 22, Section 12000 et sec.), including direct notices to residences and businesses.

Letter 11, Comment 12

Facilities subject to Proposition 65 are exempt from providing warnings if the cancer risk due to a chemical known to the State to cause cancer is less than one in 100,000 (equivalent to the 10 in one million threshold used in the DEIR). While the health risk assessment prepared for the DEIR estimates that cancer risks to residents in the vicinity of the project could exceed 10 in one million, it is assumed that residents would be exposed to diesel exhaust particulate matter continuously for a lifetime of 70 years. People exiting Interstate 80 to use the services at the Travel Plaza or passing by would be exposed for substantially less time. Accordingly, it is highly unlikely that these persons would be exposed to cancer risks above the Proposition 65 warning threshold. Therefore, no notices would need to be posted on Interstate 80.

Letter 11, Comment 13

See response to Letter No. 11, Comment A.

Letter 11, Comment 14

In general, large domestic mammals, such as horses and cattle are not the subject of toxicity testing. Thus, extensive tests and studies on the health risk of diesel

particulate matter have not been conducted on these species. Although rodent studies with diesel particulate matter exposure could be potentially extrapolated to horses and cattle, the accuracy of these extrapolations would be poor due to different biological and defense mechanisms between the species. Horses and cattle are already exposed to a high volume of particulate dust due to the nature of their confinements. Soils where horses and cattle reside are rarely watered; therefore, movements by the animals generate large amounts of particulate dust in the air column from which they breathe daily. Furthermore, the addition of diesel particulate matter from the proposed project, although would further add to their exposure, would not constitute as a significant contribution to the already high level of particulate matter exposure.

4.0 REVISIONS TO THE DRAFT EIR

Revisions have been made to the Draft EIR as a result of comments received on the document and staff-initiated changes. Staff-initiated changes include editorial and grammatical corrections, as well as the removal of all references to the Dixon Downs Horse Racetrack (Dixon Downs project).

This chapter provides the location, either the chapter or section number, title, and page number from the Draft EIR and shows the complete sentence(s) where the change was made. Text added to the Draft EIR is shown in underline format, and deleted text is shown in ~~strikethrough.~~ The comment letter and number are shown in brackets [Comment A-1] at the end of the sentence where the change to the Draft EIR text has been made.

This chapter, in combination with the Draft EIR, and the responses to comments constitutes the Final EIR. Due to the nature of the text changes that are presented below, the changes are cited individually rather than in a reproduction of the entire Draft EIR. This presentation of revisions to the Draft EIR is consistent with CEQA *Guidelines* Section 15132 detailing required Final EIR contents.

CHAPTER 2.0

Chapter 2.0, Executive Summary, page 2.0-3

Text in the third paragraph is revised as follows: Developing portions of the NQSP are to the west. Lands east of Pedrick Road and west of I-80 are unincorporated parts of Solano County. ~~The proposed Dixon Downs project site is located to the south and comprises the rest of the NQSP area~~. The Milk Farm project is located west of I-80 and is proposing highway commercial facilities. According to the NQSP, in 1995, there were lands under Williamson Act contract immediately adjacent to the project site, to the northeast, across Pedrick Road. [Staff-initiated change]

Chapter 2.0, Executive Summary, page 2.0-6

Text in the last sentence of the first paragraph under **Subsection 2.3.5, Hazards and Hazardous Materials**, is revised as follows: However, Phase 1

Environmental Assessments done on ~~in~~ the ~~NQSP~~ project site found no evidence of existing hazards related to former uses. Chapter 2.0, Executive Summary, page 2.0-9. [Staff-initiated change]

The first sentences on page 2.0-6 are revised as follows: ~~A proposed development project, Dixon Downs, is located to the south, adjacent to the project site, but within the NQSP area.~~ The approved Milk Farm project is located on the opposite side of I-80 and has a development proposal into the City of Dixon for highway commercial facilities. [Staff-initiated change]

Chapter 2.0, Executive Summary, page 2.0-10

The first heading on page 2.0-10 of the DEIR is revised as follows: **2.3.~~12~~9 Public Services** [Staff-initiated change]

Chapter 2.0, Executive Summary, page 2.0-10

Text in the second paragraph is revised as follows: The project would ~~not~~ result in ~~any~~ significant impacts that cannot be mitigated~~ion~~ to a less-than-significant level. However, development of the project would not result in unacceptable levels of service at existing intersections in the vicinity of the project. [Comment 2-1]

CHAPTER 3.0

Chapter 3.0, Project Description, page 3.0-2

Text in the last sentence in the second paragraph is revised as follows: The site is vegetated with non-native grasses and wildflowers that may include bind weed, Johnson grass, common wild geranium, wild oat ~~out~~, and red-stemmed filaree. [Staff-initiated change]

CHAPTER 4.0

Section 4.1, Aesthetics, page 4.1-29

Mitigation Measure 4.1-1 is revised as follows:

Mitigation Measure 4.1-1: Per subsection 12.20.06 E.A of the Dixon Zoning Ordinance (ZO) and the NQSP, only one freestanding sign measuring more than

six feet in height is permitted. To minimize visual impacts associated with project signage, the following measures shall be implemented.

- ~~The Applicant shall prepare a sightline study to justify the height of the proposed 85-foot freeway-oriented sign;~~
- The Applicant shall obtain a Conditional Use Permit for all freestanding signs, which must be approved by the Planning Commission;
- The Applicant shall avoid the use of animated signs, such as electronic reader/message boards;
- The Applicant shall ensure that all proposed freestanding signs incorporate architectural design features in order to enhance their appearance; and
- The Applicant shall prepare and submit a master sign program to the City for approval, which is required for all multi-tenant complexes. [Staff-initiated change]

Section 4.1, Aesthetics, page 4.1-31

Text in the last paragraph is revised as follows: Implementation of the project in combination with other development in the area, including the ~~proposed Dixon Downs project and the~~ approved Milk Farm site, would contribute to the cumulative impacts identified for future development in the project area and in the City. [Staff-initiated change]

Section 4.2, Agricultural Resources, page 4.2-5

Text in the third paragraph is revised as follows: The project site is one of the areas in the NQSP designated for future commercial uses. ~~The other area is the parcel immediately south of the project site that is under consideration for the other development included in the NQSP in the proposed Dixon Downs project.~~ The ~~proposed~~ approved Milk Farm project site, located on the other side of I-80, within 1 mile of the project site, would include highway commercial ~~office and research~~ facilities. [Staff-initiated change]

Section 4.3, Air Quality, page 4.3-2

The second sentence on the page is revised as follows: Moist marine breezes originating from the south (through the Carquinez Strait) help diffuse and dilute

pollutants during the summertime (EIP Associates~~ds~~ 2005). [Staff-initiated change]

Section 4.3, Air Quality, page 4.3-3

The third paragraph is revised as follows: Currently, the Sacramento Valley Air Basin in the vicinity of the project is designated as nonattainment for the federal 8-hour ozone standard, the state 1-hour ozone standard, and the state PM_{10} standards. ~~A considerable amount~~ of the ozone that is monitored in this area results from pollutants that have been transported from the Sacramento metropolitan area. Due to the lack of physical barriers and coastal winds blowing inland, air pollution generated in the metropolitan Bay Area is also easily spread to surrounding regions such as the Sacramento Valley as they travel to and from the San Francisco Bay Area. The transport of air emissions from the Sacramento Metropolitan Area to the San Francisco Bay Area would entail movement of pollutants through the project area. [Comment 6-1]

Section 4.3, Air Quality, page 4.3-4

Table 4.3-1, Ambient Air Quality Standards is revised as follows: [Staff-initiated change]

Table 4.3-1
Ambient Air Quality Standards[1]

Air Pollutant	Concentration/Averaging Time	
	State Standard	Federal Primary Standard
Ozone	0.09 ppm, 1-hr. avg. 0.070 ppm, 8-hr. avg.	0.12 ppm, 1-hr avg. (Revoked 6/15/05) 0.08 ppm, 8-hr avg. (3-year average of annual 4th-highest daily maximum)
Carbon Monoxide	9.0 ppm, 8-hr avg. 20 ppm, 1-hr avg.	9 ppm, 8-hr avg. 35 ppm, 1-hr avg.
Nitrogen Dioxide	0.25 ppm, 1-hr avg.	0.053 ppm, annual arithmetic mean
Sulfur Dioxide	0.04 ppm, 24-hr avg. 0.25 ppm, 1-hr. avg.	0.030 ppm, annual arithmetic mean 0.14 ppm, 24-hr avg.
Suspended Particulate Matter (PM_{10})	20 $\mu g/m^3$, annual arithmetic mean 50 $\mu g/m^3$, 24-hr avg.	50 $\mu g/m^3$, annual arithmetic mean 150 $\mu g/m^3$, 24-hr avg.

Table 4.3-1
Ambient Air Quality Standards[1]

Air Pollutant	Concentration/Averaging Time	
	State Standard	Federal Primary Standard
Suspended Particulate Matter ($PM_{2.5}$)	12 μg/m³, annual arithmetic mean	15 μg/m³, annual arithmetic mean (3-year average) 65 μg/m³, 24-hr avg. (3-year average of 98th percentile)
Sulfates	25 μg/m³, 24-hr avg.	None
Lead*	1.5 μg/m³, 30-day avg.	1.5 μg/m³, calendar quarterly average
Visibility-Reducing Particles	In sufficient amount to produce extinction of 0.23 per kilometer due to particles when relative humidity is less than 70%, 8-hour average (10 AM – 6 PM)	None
Hydrogen Sulfide	0.03 ppm, 1-hr avg.	None
Vinyl Chloride*	0.01 ppm, 24-hr avg.	None

Source:
[1] *California Air Resources Board. "Air Quality Standards)." [Online] [May 15, 2003]. <http://www.arb.ca.gov/aqs aqs.htm>.*

μg/m³ = microgram per cubic meter.
ppm = parts per million by volume.

* *The ARB has identified lead and vinyl chloride as "toxic air contaminants" with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.*

Section 4.3, Air Quality, page 4.3-5-6

Text in both paragraphs is revised as follows: The PM_{10} emissions in the project area arise from agricultural processes that dominate the region around Dixon, as well as other sources. The presence of inversion layers can augment the ambient air concentrations of pollutants such as CO, ozone, and PM_{10}. Directly emitted pollutants have the ability to stay in an inversion profile without mixing or diluting, causing an increase in pollutant concentration. Measures ~~are being~~ have been taken by a variety of organizations to reduce PM_{10} emissions from agricultural processes such as regulating agricultural burning, required field wetting, and experiments involving till versus no till treatments. [Comment 6-2 and 6-3]

Table 4.3-3, Ambient Pollutant Concentrations Registered at the UC Davis and Other Nearby Monitoring Stations, shows the ambient pollutant concentrations monitored for the past five years. The table also includes the state and federal standards for each criteria pollutant as well as the number of recorded violations of these standards. This station has shown a declining number of ozone violations in the past two years. Recently, there have been very few violations of any standard in the project area with the exception of ozone and PM_{10}. ~~Since 2000, PM_{10} has been rising in the number of exceedances (excluding a drop in 2003), with largest number of violations occurring in 2004.~~ Concentrations of CO, NO_2, and SO_x have not exceeded any air quality standards within the area for the past several years. [Comment 6-4 and 6-5]

Section 4.3, Air Quality, page 4.3-7

The title of **Table 4.3-3** is revised as follows: **Table 4.3-3 Ambient Pollutant Concentrations Registered at the UC Davis and Other Nearby Monitoring Stations.** [Comment 6-4 and 6-5]

Section 4.3, Air Quality, page 4.3-8

The second paragraph is revised as follows: The area surrounding the proposed project is composed of unoccupied and undeveloped land, a freeway, and agricultural fields. There are currently no sensitive receptors such as hospitals, elementary schools, childcare centers, or retirement homes in the vicinity within the City. Though there are residential homes on Vaughn Road south of the project site, ~~and~~ on Hess Lane southwest of the project site across Interstate 80, and on Sievers Road north of the project site across Interstate 80, the proposed project would not be contiguous to any existing residential neighborhoods. A proposed development project, the Milk Farm project, has been approved north of Interstate 80 and east of Currey Road; however, it does not include residential development.

Section 4.3, Air Quality, page 4.3-12

The text in the first paragraph is revised as follows: In the case of nonattainment for ozone, as is the case in the YSAQMD, the plan is required to produce a five percent annual reduction in ozone precursor emissions. If this reduction cannot be achieved, the CCAA requires that the district to expeditiously adopt every

feasible control measure under district purview. The *2003 Triennial Assessment and Plan Update* (see discussion of the plan in Section 4.3.3.3 below) reflects the expeditious adoption of every feasible control measure. [Comment 6-6]

Section 4.3, Air Quality, page 4.3-12

Table 4.3-5, California Ambient Air Quality Standards and Status Sacramento Valley Air Basin (Solano County) is revised as follows:

Table 4.3-5
California Ambient Air Quality Standards and Status
Sacramento Valley Air Basin (Solano County)

Pollutant	Averaging Time	Designation/Classification
Ozone (O_3)	1 Hour	Nonattainment/Serious[1]
Carbon Monoxide (CO)	8 Hour	Attainment/Unclassified
	1 Hour	Attainment/Unclassified
Nitrogen Dioxide (NO_2)	1 Hour	Attainment
Sulfur Dioxide (SO_2)	24 Hour	Attainment
	1 Hour	Attainment
Respirable Particulate Matter (PM_{10})	Annual Arithmetic Mean	Nonattainment
	24 Hour	Nonattainment
Fine Particulate Matter ($PM_{2.5}$)	Annual Arithmetic Mean	Unclassified
Lead (Pb)[2]	30 Day Average	Attainment
Sulfates (SO_4)	24 Hour	Attainment
Hydrogen Sulfide (H_2S)	1 Hour	Unclassified
Vinyl Chloride[2]	24 Hour	Unclassified
Visibility Reducing Particles	8 Hour (10 AM – 6 PM)	Unclassified

Source: California Air Resources Board. "Area Designations (Activities and Maps)." [Online] [July 21, 2005]. <http://www.arb.ca.gov/desig/desig.htm>

[1] The current status for the 1-hour standard is "nonattainment-transitional"; however, the status adopted by the ARB on November 8, 2006, due to noncompliance with the 8-hour standard is "nonattainment". The latter designation will take effect upon approval of the regulatory revisions by the Office of Administrative Law.

[2] The ARB has identified lead and vinyl chloride as "toxic air contaminants" with no threshold level of exposure for adverse health effects determined.

Section 4.3, Air Quality, page 4.3-15

The last paragraph, under Section *Airborne Toxic Control Measure for In-Use Diesel-Fueled TRU and TRU Generator Sets* is revised as follows: The ATCM for in-use diesel-fueled TRU and TRU generator sets was adopted by the ARB in February 2004, and became effective in December 2004. The ATCM applies to

"owners and operators of diesel-fueled TRUs and TRU gen[erator] sets that operate in the state of California. This specifically includes:

(1) Operators and owners of California-based TRUs and TRU gen[erator] sets that are installed on trucks, or trailers, shipping containers, or railcars; and

(2) Operators and owners of non-California-based TRUs and TRU gen sets that are installed on trucks, trailers, shipping containers, or trailers." (California Code of Regulations, Title 13, Division 3, Chapter 9, Article 8, Section 2477) [Comment 6-8]

Section 4.3, Air Quality, page 4.3-27

The last sentence of the first paragraph is revised as follows: In accordance with the *Air Quality Handbook* to assess grading and construction phases separately, **Table 4.3-8, Estimated Unmitigated Phase I Grading Em~~mis~~sions**, shows the estimated air emissions associated with unmitigated grading operations.

Section 4.3, Air Quality, page 4.3-30

Mitigation Measure 4.3-1a is revised as follows:

Mitigation Measure 4.3-1a: The Applicant shall implement the following NQSP mitigation measures:

AQ-B Tarpaulins or other effective covers shall be used on haul trucks when transferring earth materials.

AQ-C Where feasible, all inactive portions of the project construction site shall be seeded and watered until vegetation is grown.

AQ-D All disturbed soil areas not subject to re-vegetation shall be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the YSAQMD.

AQ-E Soils shall not be exposed nor grading occur during periods where wind speeds are greater than 20 mph averaged over one hour.

AQ-F Vehicle speed shall not exceed a maximum of 15 mph on all unpaved roads.

AQ-G All roadways, driveways, and sidewalks shall be paved as soon as possible. In addition, building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.

AQ-H Proper maintenance of equipment and engines shall be maintained at all times.

AQ-I Vehicle idling shall be kept to an absolute minimum. As a general rule idling shall be kept below 5 minutes (Note: The 10-minute restriction in this measure has been reduced to 5 minutes in accordance with current ARB regulations).

AQ-J During smog season (April through October), the construction period shall be lengthened so as to minimize the number of vehicles and equipment operating at the same time.

AQ-K Construction activities should utilize new technologies to control ozone precursor emissions as they become available and feasible.

[Comment 12 and 13]

Section 4.3, Air Quality, page 4.3-37

The text in the second paragraph is revised as follows: This restriction is consistent with the intent of the pending ARB regulation that would prohibit heavy-duty diesel trucks from idling for more than five minutes when not engaged in operational activities. Based on activity at another Flying J Travel Plaza in Ripon, California, t~~T~~he Applicant has indicated that 35 percent of the heavy-heavy-duty diesel trucks that visit the proposed project would pull trailers equipped with TRUs (Electronic Mail Darnell 2005). [Comment 6-8]

Section 4.3, Air Quality, page 4.3-44

Mitigation Measure 4.3-3 is revised as follows:

Mitigation Measure 4.3-3c: The Applicant shall provide a minimum of one dedicated covered parking area for refrigerated trailers that will be parked at the Travel Plaza for more than two hours. The covered parking area shall include a minimum of 30 parking spaces.

Mitigation Measure 4.3-3d: The Applicant shall use Energy Star reflective roofing materials, lighting, appliances, and heating and cooling systems to reduce electrical consumption associated with the project.

Mitigation Measure 4.3-3e: Heavy-heavy-duty trucks parked at the Dixon Flying J Travel Plaza shall not idle for longer than five minutes, in conformance

to the California Air Resources Board's requirements with respect to commercial truck idling. The operators of the Dixon Flying J Travel Plaza shall enforce and carry out the idling program by posting signs along the route to the on-site truck parking area and place selectively in the truck parking areas. The signs shall inform site users of the ARB regulation that prohibits trucks from idling more than five minutes when not engaged in an operational activity. Educational brochures shall be made available at the Dixon Flying J Plaza explaining the no-idling regulation. Future Flying J employees shall inform on-site truck drivers regarding the no-idling restriction during their normal patrolling of the parking area to pick up garbage and to identify, prevent, or report illicit activities to local law enforcement officials. This shall be incorporated into the employee manual, which shall be provided to all employees.

Other Potential Emission Control Measures

Other potential emission control measures that could reduce project NO_x emissions were evaluated; however, the following measures were rejected as being infeasible for either the Applicant or other entities to implement.

~~**Mitigation Measure 4.3-3c:**~~ **TRU Emission Reduction**

Several alternatives and/or emission controls may be available to reduce emissions from the TRUs, which account for 54 percent of the project's NO_x emissions. These measures would also comply with future ultra-low emission performance standards of the ATCM for TRUs. They include:

- Electric standby;
- Cryogenic temperature control systems or hybrid with diesel engine;
- Alternative-fueled engines (includes natural gas, propane, ethanol, and methanol);
- Exclusively fueled with alternative diesel fuel that has been verified by the ARB; and
- Fuel cells (California Air Resources Board (a) 2004).

Installation of alternative technologies for TRUs, such as fuel cells or electric units, is the responsibility of the owner of the refrigerated trailer and is beyond the control of the Applicant. Similarly, Flying J would have little or no control over the fuels used in the TRUs, which could be purchased elsewhere.

Accordingly, these potential ~~mitigation~~ emission control measures are not feasible for implementation by the Applicant to reduce the project's NO_x emissions.

~~Mitigation Measure 4.3-3d:~~ APU and Truck Emission Reduction

Another potential mitigation measure is a so-called "off-board power infrastructure." Off-board power infrastructure would provide 110-volt electrical power for driver accessories such as heater, air conditioning, telephone, computers, and television. A console that would contain all connections and payment options would connect to the truck window using a template insert. Installation and use of such a system would require the modifications to heavy-duty trucks and offer a potential mitigation measure for truck and APU emissions. It would not provide a means to reduce the on-site traveling emissions or TRU emissions, which account for 78 percent of the on-site NO_x emissions associated with the proposed project. Installation of off-board power infrastructure would cost $12,000 to $20,000 per parking space depending on the number of parking spaces installed (California Air Resources Board 2005). The infrastructure system would provide service to those trucks that would stay for an extended period (i.e., for two to 10 hours).

It has been estimated that up to 108 heavy-heavy-duty trucks would stay for more than one hour, although up to 50 percent would not rely on an APU to provide electricity, heating and cooling. Of the 108 heavy-heavy-duty trucks, 60 percent would stay for 10 hours (nighttime) and 40 percent would stay for two hours (daytime). Thus, it is assumed that up to 65 parking spaces (out of the total 221 proposed truck parking spaces) would be serviced by this system. Assuming an average cost of $16,000 per parking space, installation would costs of $1,040,000 would be required to provide off-board electrification for all heavy-heavy-duty trucks staying for more than one hour. The Travel Plaza will not allow drivers to idle their main engines, which is typically what is avoided by installation of an off-board power infrastructure system, and idling will be limited to 5 minutes. Thus, the only emissions that would by mitigated by such a system are those from the small APU engines. The ARB, in evaluating the revised ATCM for truck idling, recognized APUs as an acceptable alternative method to provide cab comfort and electrical power at truck stops in lieu of truck engine idling. Moreover, as applied to the proposed project, the cost

effectiveness of an off-board power infrastructure system would be on the order of $75,000 to $100,000 per ton of NO_x to eliminate only the NO_x emissions from the APUs. These values would greatly exceed the values considered by the YSAQMD to be cost-effective best available control technology ($24,500 per ton of NO_x reduced). Accordingly, this potential mitigation measure is not considered feasible to reduce the project's NO_x emissions.

Section 4.3, Air Quality, page 4.3-45

Table 4.13-16, Summary of Maximum Modeled Cancer Risks of Diesel Particulate Matter from the Travel Plaza Operations is updated as follows:

Table 4.3-16
Summary of Maximum Modeled
Cancer Risks of Diesel Particulate Matter from the Travel Plaza Operations

Receptor	Cancer Risk
Residential[1]	~~3.~~049 x 10^{-6}
Workplace[2]	38 x 10^{-6}

Source: Impact Sciences.

[1] *Maximum impact occurred at a receptor located ~~southwest~~ north of the project site across Interstate 80 on ~~Hess~~ Sievers Road.*

[2] *Maximum impact occurred at a receptor located northwest of the project site across Interstate 80, which is zoned as CH (Highway Commercial) but currently undeveloped.*

Impact 4.3-4 paragraphs, starting on page 45 are revised as follows:

Figure 4.3-1, Modeled Impacts of Diesel Exhaust Particulates for Residential Receptors, illustrates the potential risks for residential receptors due to DPM from the proposed operation of the Travel Plaza. **Figure 4.3-1** shows the isopleth (a line of constant modeled excess cancer risk) that represents an estimated cancer risk of 10 in one million for residential receptors. ~~Note, however, that there are no residences in the area bounded by the 10 in one million isopleth.~~ The nearest residences ~~is~~ are located north of the Travel Plaza on Sievers Road and south of the Travel Plaza near Vaughn Road. ~~Moreover, p~~Per the Solano County General Plan and the City of Dixon Northeast Quadrant Specific Plan, the land parcels located on southern and southwestern sides of the Travel Plaza

may be used for the light industrial and commercial purposes, and the land parcels located on the northwestern side (across Interstate 80) may be used for highway commercial uses. Therefore, these areas were not considered as potential residences (Solano County 1999; City of Dixon 1993).

Figure 4.3-2, Modeled Impacts of Diesel Exhaust Particulates for Workplace Receptors, illustrates the potential risks for workplace receptors due to DPM from the proposed operation of the Travel Plaza. **Figure 4.3-2** shows the isopleth that represents an estimated cancer risk of 10 in one million for workplace receptors. While there are ~~no known~~ workplaces within the area bounded by the 10-in-one-million isopleth at the intersection of Sievers Road and Pedrick Road to the north of the project site, ~~these~~ other areas ~~were considered as potential workplaces for this analysis~~ zoned for future industrial and commercial development per Solano County General Plan and the City of Dixon Northeast Quadrant Specific Plan also were considered as potential workplaces for this analysis.

Table 4.13-17 is revised as follows:

Table 4.3-17
Summary of Maximum Noncancer Health Impacts of Diesel Particulate Matter from the Travel Plaza Operations

Receptor	Chronic Hazard Index
Residential[1]	0.0019 0.031
Workplace[2]	0.12

Source: Impact Sciences.

[1] *Maximum impact occurred at a receptor located ~~southwest~~ north of the project site across Interstate 80 on ~~Hess~~ Sievers Road.*

[2] *Maximum impact occurred at a receptor located northwest of the project site across Interstate 80, which is zoned as CH (Highway Commercial) but currently undeveloped.*

Section 4.3, Air Quality, page 4.3-49

The first sentence in the first paragraph is revised as follows: Using the YSAQMD's thresholds of significance, the health risk assessment found that the

anticipated cancer risks associated with the project are ~~3.0~~49 in one million at the maximally impacted residential receptor and 38 in one million at the maximally impacted workplace receptor.

Mitigation Measure 4.3-4 is revised as follows: **Mitigation Measure 4.3-4:** ~~The m~~Mitigation ~~m~~Measure~~s~~ 4.3-3c for mobile source TRU emissions discussed in **Impact 4.3-~~2~~** could also reduce DPM emissions. ~~However, a~~As discussed previously, ~~these~~ other potential emission control measures are not considered feasible for this project.

Section 4.3, Air Quality, page 4.3-50

The text in the third paragraph is revised as follows: The emission from the Milk Farm commercial/retail project ~~and the Dixon Down Racetrack and Entertainment Center are~~ is listed along with emissions associated with the operation of the Flying J Travel Plaza in **Table 4.3-18, Flying J Travel Plaza and Other Local Project Emissions**. [Staff-initiated change]

Section 4.3, Air Quality, page 4.3-51

Table 4.3-18, Flying J Travel Plaza and Other Local Project Emissions has been revised as follows:

Table 4.3-18
Flying J Travel Plaza and Other Local Project Emissions

Emissions Source	Maximum Daily Emissions (lbs/day)				
	ROG	NO_x	CO	SO_x	PM_{10}
Milk Farm (winter mitigated)[1]	264	297	2,368	NR	171
~~Dixon Downs[2]~~	~~239.06~~	~~316.98~~	~~NR~~	~~NR~~	~~299.12~~
~~Dixon Downs (large event)[2]~~	~~304.91~~	~~408.59~~	~~NR~~	~~NR~~	~~390.98~~
Flying J Travel Plaza[32]	27.17	105.01	123.12	0.25	6.82

Sources:
[1] *BASELINE Environmental Consulting,* Milk Farm Project, Draft Environmental Impact Report, *May 2005.*
~~[2] *EIP Associates,* Dixon Downs Horse Racetrack and Entertainment Center Project, Draft Environmental Impact Report, *September 2005.*~~
[23] *Impact Sciences, Table 4.3-15.*

[Staff-initiated change]

Section 4.4, Biological Resources, page 4.4-1

The bulleted list is revised as follows:

- City of Dixon General Plan (City of Dixon 1993)
- City of Dixon Northeast Quadrant Specific Plan (2005)
- City of Dixon Northeast Quadrant Specific Plan EIR (1995)
- ~~Dixon Downs Draft EIR (EIP Associates 2005)~~
- Swainson's Hawk Population and Habitat Use Assessment, Solano HCP/NCCP, LSA Associates, Inc., 2004

[Staff-initiated change]

Section 4.5, Hazards and Hazardous Materials, page 4.5-5

The second sentence in the second paragraph is revised as follows: In addition, immediately under the area where the release occurred, the groundwater table was also affected. [Staff-initiated change]

Section 4.5, Hazards and Hazardous Materials, page 4.5-14

Mitigation Measure 4.5-2 is revised as follows:

Prior to the issuance of a grading permit, any contaminated soil (including pesticide contamination) as determined by a Phase II site assessment, shall be removed and disposed of at an off-site disposal facility permitted to accept such waste. Confirmatory soil sampling shall be performed after soil removal to verify and document that no contaminated soil remains on-site. Results of soil testing shall be submitted to the Solano County Environmental Health Department. Site development at that location shall not occur until a closure letter for the soil contamination has been obtained from the Solano County Environmental Health Department.

Construction contract solicitations and specifications shall summarize the results of the 1993 Phase I ESA, the Phase II site assessment that shall be prepared as part of this mitigation, and any subsequent reports, to inform construction workers of the potential for encountering previously unidentified contamination. Contract specifications and site development plans (e.g., grading plans) shall include wording that during site preparation and construction activities, if evidence of hazardous materials contamination is observed or suspected (i.e., stained or odorous soil, or oily or discolored water) beyond that identified in the Phase II, construction activities shall cease and an environmental professional shall assess the situation. If it is confirmed that contamination exists, contaminated soil shall be disposed of off-site pursuant to Solano County Environmental Health Department requirements and to the satisfaction of that Department.

~~The environmental professional shall determine whether additional investigation is needed and specify control measures for the affected site to reduce the potential for exposing construction personnel to hazards. If the investigator determines soil samples should be collected, results of the investigation and a plan to manage the hazard to minimize risks to construction personnel shall be submitted to the Solano County Environmental Management Department if the release is subject to reporting.~~

Section 4.7, Hydrology and Water Quality, page 4.6-1

The second paragraph is revised as follows: Primary information in this section was obtained from the City of Dixon Northeast Quadrant Specific Plan (1995), Preliminary Drainage Report, Flying J Travel Plaza (Morton & Pitalo, Inc.,

December 19, 2005, updated May 29, 2005), Dixon California Engineering Design Standards and Construction Specifications (City of Dixon Engineering Department, 2004), The Water Quality Control Plan (Basin Plan) for the California Regional Water Quality Control Board Central Valley Region Fourth Edition and the Sacramento River Basin and The San Joaquin River Basin (1998), and Dixon Municipal Code (June 22, 2004), Preliminary Grading and Drainage Plan, prepared by Morton and Pitalo, Inc. (July 15, 2004) found online through www.thecityofdixon.com. Additional information was obtained through communication with the City of Dixon and Dixon Resources Conservation District.

Section 4.7, Land Use and Planning, page 4.7-6

The first paragraph is revised as follows: Also, as shown in **Figure 4.7-1**, land use classifications surrounding the development parcel within other areas of the NQSP include vacant land designated as Light Industrial (ML) and Professional/Administrative/Office (PAO). ~~Immediately to the south is proposed as the future home of the Dixon Downs project.~~ CH lies immediately east of the project site, across Pedrick Road. Northwest of the development parcel, across I-80, the land is unincorporated Solano County and is being used for agricultural production. [Staff-initiated change]

The last sentence on the page is revised as follows: When this project is taken in combination with other development proposed in the NQSP ~~(e.g., Dixon Downs)~~, the NQSP area may provide substantial employment and services. [Staff-initiated change]

Section 4.8, Noise, page 4.8-18

The second paragraph on this page as been revised as follows:

~~The Dixon Downs project, south of the project site, is planned for development in the future. Given this, there is a possibility that the Flying J project would be constructed simultaneously with the Dixon Downs project.~~ ~~However,~~ ~~c~~Construction activity associated with the Flying J project would occur ~~farther away~~more than one mile from the nearest sensitive receptor on Vaughn Road ~~than the construction with the Dixon Downs project~~. Therefore, ~~C~~construction noise and vibration from the construction of the Flying J project would be

imperceptible to sensitive receptors on Vaugh Road~~if the two projects were to undergo construction at the same time~~. [Staff-initiated change]

Section 4.8, Noise, page 4.8-19

The following footnote has been added to **Table 4.8-7, Predicted Cumulative Roadway Noise Levels:**

Note: The Future Conditions w/o Project (2025) includes the development of the Dixon Downs project. Since the preparation of the analytical information in this table, the Dixon Downs project is no longer being considered for approval by the City of Dixon. The Dixon Downs project would have contributed a higher number of vehicles trips to the roadways than the land uses designated for that site by the NQSP (see Section 4.10, Traffic and Circulation for a detailed description of the differences in vehicle trips). Therefore, noise levels under this column represent worst case conditions with future development.

Section 4.10, Traffic and Circulation, page 4.10-30

Text in the last paragraph on page 4.10-30 has been revised as follows:

~~The City's Northeast Quadrant Specific Plan (NQSP) shows Professional Drive as a four-lane arterial roadway extending west from Pedrick Road and turning south to intersect Vaughn Road in the City of Dixon. In the Dixon Downs EIR, Professional Drive is labeled "Dixon Downs Parkway" and is planned to accommodate projected traffic from the racetrack, convention center and commercial uses associated with full buildout of the Dixon Downs project, as well as other growth in the planning area.~~

The following cumulative analysis was prepared during the time the City of Dixon was considering the development of the Dixon Downs Racetrack, a mixed-use development including a horse racing facility and commercial uses, that would be located immediately south of the project site. The traffic model used for to evaluated cumulative impacts of the proposed project includes the Dixon Downs Racetrack for 2025 background conditions. Subsequent to the preparation of this analysis, residents of the City of Dixon voted down the proposed Dixon Downs project. Given this, it is assumed that the site immediately south of the project site, where the Dixon Downs project was

formerly proposed, would be developed under the approved land uses for the Northeast Quadrant Specific Plan (NQSP). The land use designations for the adjacent site is ML (Light Industrial) and Professional/Administrative Offices. An evaluation comparing the allowed land uses by the Northeast Quadrant Specific Plan (NQSP) and the formerly proposed Dixon Downs project is provided below under **Subsection 4.10.2, Comparison Analysis Between the Dixon Downs project and Approved Land uses for the NQSP.**

Section 4.10, Traffic and Circulation, page 4.10-35

The following text has been added to page 4.10-35 of the Draft EIR:

As described above, residents of the City of Dixon voted down the proposed Dixon Downs project that was approved by the City. For the purposes of this EIR, it is assumed that the site immediately south of the project site, where the Dixon Downs project was formerly proposed, would be developed under the approved land uses for the Northeast Quadrant Specific Plan (NQSP). The land use designations for the adjacent site is ML (Light Industrial) and Professional/Administrative Offices. The trip rates for these land uses, using "Industrial Park" (ITE Trip Generation Land Use #130) and "Office Park" (ITE Trip Generation Land Use #750), are conservatively high, and on a weekday PM peak hour, trips would total 3,096 (this total refers to two-way, or inbound + outbound trips). Directionally, they would total 574 inbound and 2,522 outbound trips.

A comparison between the Phases 1 and 2 (Tier 1 horse racing event level) 2025 PM peak hour volumes the NQSP land use volumes was conducted. The weekday PM peak hour total trip generation from Dixon Downs project, assuming the Phases 1 and 2, Tier 1, event, would be 4,333 event hour trips. Of these, a total 2,603 trips (or approximately 60 percent of the total 4,333 trips produced by Dixon Downs under this scenario) have been distributed through the Pedrick Road/I-80 Eastbound Ramps intersection during the weekday PM peak hour. Specifically, the Dixon Downs EIR traffic study shows 892 inbound and 1,711 outbound trips through the Pedrick Road/I-80 Eastbound Ramps intersection during the weekday PM peak hour.

If the NQSP total trips (3,096) were distributed in a pattern similar to that of the Dixon Downs scenario, then 60 percent, or 1,858 trips would use the Pedrick Road/I-80 interchange intersections. Distribution would be 344 inbound and 1,514 outbound.

By this approximate projection, the NQSP inbound and outbound volumes through the intersections of concern would be less than those generated by Dixon Downs. Traffic volumes associated with the NQSP are expected to be less than those anticipated for the Dixon Downs project included in this analysis. Therefore, the following cumulative impact analysis is considered a "worse-case" scenario. However, the conclusions are not expected to change in level of significance as a result of this change because development of the land uses allowed by the NQSP, in addition to future projects, would not decrease the Level of Service F experienced on Pedrick Road/I-80 interchange intersections. Therefore, impacts remain significant and unavoidable. [Staff-Initiated Change]

Section 4.10, Traffic and Circulation, page 4.10-33

The second sentence in the second paragraph is revised as follows: *Additional improvements would be determined in consultation with Caltrans during the Project Study Report/Project Report ~~(~~(PSR/PR) process.* [Staff-Initiated Change]

Section 4.11, Utilities and Service Systems, page 4.11-6

The second paragraph on page 4.11-6, under **Subsection 4.11.2.4**, is revised as follows:

In 2003, DSMWS prepared a WSA for the NQSP, which is within the service area of DSMWS. The WSA concluded that in order to provide sufficient production and delivery capacity to development within the NQSP area, DSMWS would need to expand the current service system. The WSA proposed two, 1,500 gpm groundwater deepwell facilities; a 1 million-gallon water storage tank; and a 2,000-gpm booster pump station in the NQSP. However, since the preparation of the WSA, the DSMWS has indicated that new standards now require an additional 1-millon-gallon tank for total storage capacity of 2 million gallons, which will be reflected in the next update of the DSMWS Master Plan. The project would be required to comply with the revised standards. **[Note to**

Reviewer: Please confirm] These new facilities would connect the NQSP area to the rest of the DSMWS service system. [Comment 5-1]

CHAPTER 5.0

Chapter 5.0, Other CEQA, page 5.0-3

The second paragraph is revised as follows:

Prior to NQSP area build-out, a well, two tanks, and a booster facility would be constructed in the NQSP area to provide domestic water service. A second high-volume deep well facility also is planned for the area and may need to be constructed prior to project implementation. An existing 12-inch water main line is located south of the site at Vaughn Road. This line would be extended with new water lines to the north within Pedrick Road and Professional Drive. ~~Currently, this line would be extended as part the Dixon Downs project, with new water main lines installed to the north within Pedrick Road and Professional Drive.~~ Moreover, two future wells would be drilled in the NQSP area as part of the City's Master Water Plan. [Staff-Initiated Change]

5.0 MITIGATION MONITORING AND REPORTING PLAN

This Mitigation Monitoring and Reporting Plan (MMRP) has been prepared in conformance with Section 21081.6 of the California Environmental Quality Act. It is the intent of this MMRP to (1) verify satisfaction of the required mitigation measures (2) provide a methodology to document implementation of the required mitigation measures; (3) provide a record of the MMRP; (4) identify monitoring responsibility; (5) establish administrative procedures for the clearance of mitigation measures; (6) establish the frequency and duration of monitoring; and (7) utilize existing review process wherever feasible.

APPENDIX 3.0

TRAFFIC

TABLE 1
FLYING J PROJECT TRIP GENERATION

Vehicle Type	Peak Hour	Two-Way Trips ((Inbound + Outbound) Generated at the Ripon Flying J along S.R. 99 (early November, 2005)	Seasonal Adjustment to Ripon November volumes to reflect September volumes (+9%) [1]	Adjustment Factor for Freeway Volume SR 99 versus I-80 (+ 13% autos, no adjustment for 3 & 4 axle trucks due to small volumes, -14% for large trucks)[2]	Proposed (Two-Way) Project Trips at Dixon Flying J ((Inbound + Outbound)
Automobiles, pick-ups, RVs,	Weekday AM	227	+ 20	+ 15	279
	Weekday PM	222	+ 20	+ 15	273
	Saturday PM, 12 - 1	268	+ 24	+ 18	330
Trucks – 3 and 4 axle	Weekday AM	27	+ 2	0	29
	Weekday PM	10	+ 1	0	11
	Saturday PM, 12 – 1	9	+ 1	0	10
Truck – 4 + axles	Weekday AM	152	+ 14	- 23	143
	Weekday PM	116	+ 10	- 18	108
	Saturday PM, 12 – 1	57	+ 5	- 9	53
TOTAL	Weekday AM	**406**	--	--	**451**
	Weekday PM	**348**	--	--	**392**
	Saturday PM, 12 - 1	**334**	--	--	**393**

[1]To provide conservative trip generation projections, seasonal adjustments were made to the November 2005 traffic counts collected at the Ripon Flying J. The adjustment were made to take into account seasonally higher agricultural trucking and passenger car (vacation travel) volumes on S.R 99 in late September (our analysis time period) versus mid-November when counts were conducted in Ripon..

[2] Truck stops located along major freeways derive their largest percentages of trips from freeway traffic passing the site. The Ripon Flying J, where count data was collected, is located adjacent to State Route 99, while the proposed project is located adjacent to the I-80 freeway. These freeways have different percentages of autos and trucks, which influence traffic volumes entering and leaving facilities such as Flying J truck stops. To more accurately apply the results of trip generation counts from the Ripon facility to the project site, adjustments have been made, based upon vehicle mix data available from Caltrans: *Annual Average Daily Truck Traffic on the California State Highway Sys*tem, State of California Department of Transportation, April 2004. Note: The "-14%" reduction for large trucks is a conservatively low based upon Claltrans count data.