

APPENDIX A

Notice of Preparation (NOP) and NOP Comment Letters



NOTICE OF PREPARATION THE CAMPUS DRAFT ENVIRONMENTAL IMPACT REPORT

Date: August 30, 2023

To: State Clearinghouse, Agencies, Organizations and Interested Parties

From: City of Dixon Community Development Department

Subject: Notice of Preparation and Scoping Meeting for the Draft Environmental Impact Report for The Campus

Scoping Meeting: September 20, 2023 at 7:00 pm
(Online meeting via Zoom (see page 2 for information))

Comment Period: Wednesday, August 30, 2023 to Friday, September 29, 2023

NOTICE IS HEREBY GIVEN that the City of Dixon (City), as the Lead Agency, has determined that The Campus project (proposed project) will require preparation of an Environmental Impact Report (EIR) in compliance with the California Environmental Quality Act (CEQA). This Notice of Preparation (NOP) is being distributed to applicable responsible agencies, trustee agencies, interested agencies, parties, and organizations as required by CEQA. Interested agencies and parties are requested to comment on the scope and content of the significant environmental issues, mitigation measures, and reasonable alternatives to be explored in the Draft EIR. Information regarding the project description, project location, public outreach process, and topics to be addressed in the Draft EIR is provided below.

Notice of Preparation 30-Day Comment Period

The City, as lead agency, is soliciting comments from responsible agencies, trustee agencies, public agencies, organizations, and members of the public regarding the scope and content of the Draft EIR, and the environmental issues and alternatives to be addressed in the Draft EIR. The City requests that responsible agencies, trustee agencies, interested parties, and the Office of Planning and Research respond in a manner consistent with Section 15082(b) of the CEQA Guidelines. Pursuant to Public Resources Code Section 21080.4, responsible agencies, trustee agencies, and the Office of Planning and Research must submit any comments in response to this notice no later than 30 days after receipt. In accordance with the time limits established by CEQA, the NOP public review period will begin on August 30, 2023 and end on September 29, 2023.

In the event that the City does not receive a response from any responsible or trustee agency by the end of the review period, the City may presume that the responsible agency or trustee agency has no response to make (CEQA Guidelines Section 15082(b)(2)). Please provide your written/typed comments (including name, affiliation, telephone number, and contact information) to the address shown below by 5:00 p.m. on Friday, September 29, 2023. For additional information, please contact:

Raffi Boloyan, Community Development Director
City of Dixon Community Development Department
600 East A St.
Dixon, CA 95620
rboloyan@cityofdixon.us



Draft EIR Scoping Meeting

The City will hold an online scoping meeting to: (1) inform the public and interested agencies about the proposed project, and (2) solicit public comment on the scope of the environmental issues to be addressed in the Draft EIR, as well as the range of alternatives to be evaluated. No action will be taken on the project at the scoping meeting. The sole purpose of the scoping meeting is for interested parties to be introduced to the project, to ask questions about the project, and to provide feedback regarding the scope of what CEQA topics should be assessed in the Draft EIR. The scoping meeting is not an appropriate time to provide comments on the merits of the project or provide testimony to support or oppose the project. Interested parties are strongly encouraged to submit written comments via email or letter.

At a future undetermined time (anticipated in early 2024), through noticed public hearings, the Planning Commission will review the Draft EIR (DEIR) and accept comments on the adequacy of the DEIR. Subsequently, through noticed public hearings, the Planning Commission will review the project and the Final EIR and provide recommendations to the City Council, who will take action on the project, including consideration of the Final EIR, at noticed public hearings.

The date, time, and place of the online Scoping Meeting is as follows:

The Campus Draft EIR Scoping Meeting
September 20, 2023 at 7:00 pm

Join via Zoom
<https://us02web.zoom.us/j/84055900041?pwd=WGxaTjV6aUkvZk1pWWdWSVpDczlDdz09>
Or www.zoom.com

Meeting ID: 840 5590 0041
Passcode: 09202023

Join Zoom Via Phone
+1 (669) 900-9128
Meeting ID: 840 5590 0041
Passcode: 09202023

Project Location and Setting

The City is located in the Central Valley region of Northern California, along the Highway 80 freeway corridor, with the cities of Davis and Sacramento located approximately six miles and 25 miles to the northeast, respectively, and the cities of Vacaville and San Francisco located approximately 15 miles and 65 miles to the west, respectively, as shown on **Figure 1**.

The Campus project site is located within the City's Northeast Quadrant Specific Plan (NEQSP) and comprises nearly 40 percent of the plan's total 643+/- acres. The project site is located on the eastern edge of the NEQSP adjacent to Pedrick Road, as shown in **Figure 2**. The project site is comprised of APNs 0111-040-010, -020, -030, -040, and 0111-080-050, contains a total of 260 +/- acres. The site is bounded by Pedrick Road with Solano County unincorporated Agricultural lands to the east, by Industrial designated lands to the north and south, and lands designated as Regional Commercial and Industrial to the west, as shown on **Figure 3**.



**Notice of Preparation
The Campus Draft Environmental Impact Report**

The project site is currently zoned as Professional & Admin Office (PAO-PUD), Neighborhood Commercial (CN-PUD), and Light Industrial (ML-PUD), and would be rezoned to Campus Mixed Use Planned Development (CAMU-PD) consistent with the properties General Plan land use designation (**Figure 4**).

Project Description

The Campus proposes a mixed-use development planned to fully realize the intent of the City’s recently created Campus Mixed Use General Plan designation. As defined by the City’s 2040 General Plan, the intent of the Campus Mixed Use designation is “... to foster new mixed employment districts with a range of job-generating uses, housing, and easy access to the regional transportation network.”

The proposed project would consist of a phased, mixed-use development that includes an approximately 48-acre Dixon Opportunity Center (DOC), approximately 144 acres of residential uses, and approximately 2.5 acres of commercial uses (**Figure 5**). Preliminary concepts for the DOC area at the north end of the site are shown in **Figure 6**. A high-density residential site would be located contiguous to the DOC, and adjacent residential uses. A service commercial site would be located in the southeast corner of the DOC and adjacent to the high-density residential site. The southern portion of the site would consist of medium density and low-density residential uses. **Table 1** describes the preliminary land use summary.

Table 1: Proposed Land Use Summary

PARCEL	LAND USE	ZONING	GROSS AREA (acres)	Dwelling Units (du)		CAMU LAND USE
				DENSITY (du/ac)	DUs (units)	
RESIDENTIAL						
LOT 1	CAMU	CAMU-PD	27.90	4.6	128	LDR
LOT 2	CAMU	CAMU-PD	18.05	5.3	95	LDR
LOT 3	CAMU	CAMU-PD	11.23	8.7	98	MDR
LOT 4	CAMU	CAMU-PD	6.46	9.3	60	MDR
LOT 5	CAMU	CAMU-PD	15.80	7.6	120	MDR
LOT 6	CAMU	CAMU-PD	18.80	6.9	130	LDR
LOT 7	CAMU	CAMU-PD	18.89	5.1	96	LDR
LOT 8	CAMU	CAMU-PD	15.60	5.7	89	LDR
LOT 9	CAMU	CAMU-PD	11.54	19.5	225	HDR
Residential Total:			144.27	7.2	1,041	
COMMERCIAL AND EMPLOYMENT USES						
SERVICE COMMERCIAL						
LOT 11	CAMU	CAMU-PD	2.49			CC
Sub-Total:			2.49			
LIGHT INDUSTRIAL (TECH CAMPUS / BUSINESS PARK)						
LOT 12	CAMU	CAMU-PD	47.87			T/BP-LI
Sub-Total:			47.87			
Commercial and Employment Total:			50.36			



**Notice of Preparation
The Campus Draft Environmental Impact Report**

PARCEL	LAND USE	ZONING	GROSS AREA (acres)	Dwelling Units (du)		CAMU LAND USE
				DENSITY (du/ac)	DUs (units)	
PARKS, OPEN SPACE & PUBLIC USES						
PARKS AND OPEN SPACE						
LOT 14	CAMU	CAMU-PD	2.36			P/R
LOT 15	CAMU	CAMU-PD	1.64			P/R (Paseo)
LOT 16	CAMU	CAMU-PD	1.58			P/R (Paseo)
LOT 17	CAMU	CAMU-PD	1.42			P/R (Paseo)
LOT 18	CAMU	CAMU-PD	1.42			P/R (Paseo)
LOT 19	CAMU	CAMU-PD	5.00			P/R
Parks and Open Space Total:			8.42			
PUBLIC						
LOT 10 (Detention Pond)	CAMU	CAMU-PD	25.14			P/QP
LOT 13 (Well Site)	CAMU	CAMU-PD	1.58			P/QP
LOT 20 (Drainage Channel)	CAMU	CAMU-PD	1.18			P/QP
Public / Quasi-Public Total:			27.90			
ROADS / R.O.W.		CAMU-PD	23.66			
TOTAL						
The Campus Total:			254.61		1,041	

Dixon Opportunity Center

The 47.87-acre DOC would be a large employment area developed to accommodate technology, business park, and light industrial uses. Approximately 660,000 square feet (sf) could be developed within the DOC. The intent of this area is to foster new mixed-use employment districts with a range of job-generating and other tax revenue generating uses. Clusters of related light industrial, manufacturing, office, and research and development uses are envisioned. Large and small scale industrial, manufacturing, office, research, heavy commercial uses, and other related uses could be developed as these critical uses grow within Dixon.

Residential Uses

A total of nine lots are planned to accommodate low-, medium-, and high-density residential uses. Residential uses would be sited in the southern portion of the project site. Up to 1,041 residential units are planned.

Five lots – Lots 1, 2, 6, 7, and 8 – would be designated for low density residential uses, with density ranges between 4.6 dwelling units per acre (du/ac) and 5.7 du/ac. Low-density residential units would be typical single-family detached units with varying lot and product sizes, totaling 538 units.

Three lots – Lots 3, 4, and 5 – would be designated for medium density residential (MDR) uses. Units in those lots would range in density from 7.6 du/ac to 9.3 du/ac, totaling 278 units. The MDR land use is anticipated to accommodate urban density housing with a strong orientation toward the street. Unit types could include single family attached or detached units facing the public street, and brownstones, townhomes, and condominiums. Varying lot and product sizes would provide a diversity of housing options. Units may be accessed via a rear alley or auto court.

Notice of Preparation The Campus Draft Environmental Impact Report

Lot 9, in the eastern part of the project site, immediately south of the DOC, would be comprised of high-density residential (HDR) uses. The 11.54-acre HDR use would be constructed at a density of 19.5 du/ac, resulting in up to 225 units. The HDR land use is intended to accommodate attached multifamily housing. Similar to the MDR designation, HDR units are required to have a strong orientation toward the street. A variety of higher density housing types would be appropriate if designed with front forward architecture which includes front entry doors and porches facing the street, and off-street parking located in the rear of the lot and accessed from alleys or internal driveways. Typical unit types may include apartments, townhomes and condominiums.

Service Commercial

The Service Commercial (SC) land use is anticipated to accommodate a variety of retail and service activities. The SC land use would be 2.49 acres and accommodate up to 27,000 square feet of retail commercial space. Typical uses may include retail shops, restaurants, local pubs, banks, grocery stores, convenience services, and offices. These uses, within walking distance to the DOC and residential areas, are planned to meet the everyday needs of local residents and promote non-vehicular forms of transportation. The intent is to provide for a unique mix of uses that support The Campus concept.

Parks and Open Space

Approximately 13.42 acres of open space, parks, paseos, and green space are planned in The Campus. The Campus would provide public and quasi/public spaces for people to gather and to reinforce community identity. The centrally located Campus Green, a 6.06-acre traditional urban park element connecting the tech park to the low-density residential area in the southern portion of the project site, would provide the visual focus of The Campus. The Campus Green is intended to accommodate passive recreation, provide a visual respite for residents, shoppers and employees, and form a community gathering place. It would include a central park pavilion as a venue for a wide variety of community activities, including concerts, fairs, exhibits, markets and other events that would bring the community to The Campus. The north end of the Campus Green would be anchored by a 2.36-acre park within the DOC. A second park site, a 5-acre neighborhood park, would be included on the south end of the Campus Green in the planned low-density residential area.

Infrastructure

Water Facilities

Domestic water service would be distributed throughout the NEQSP plan area and The Campus by new water lines located within the surrounding roadway system including Professional Drive, Campus Parkway, and the Commercial Drive realignment (**Figure 7**). The project is estimated to have an Average Water Demand of 562.7 acre-feet per year with a Peak Hour Demand of 1.658 million gallons per day (mgd). A new municipal water well (1,500 gpm) and future tank site (1.58 acres) are proposed on the north side of the project site adjacent to Professional Drive. The municipal water well would be constructed with the initial phase of development.

Wastewater Facilities

The proposed NEQSP amendment includes modifications to the wastewater collection system to better serve The Campus (**Figure 8**). The project site is included in the North First Street Assessment District (NFSAD) and was previously assessed for the sewer oversizing from Vaughn Road to Hall Park. Under the NFSAD, the project site was allocated 1.17 mgd peak wet weather flow (PWWF). The proposed project is anticipated to produce 1.06 mgd (PWWF) being less than the allocated capacity. A wastewater alignment to serve the development is located within Professional Drive which runs from Vaughn Road to the site's northern

Notice of Preparation The Campus Draft Environmental Impact Report

boundary. The existing sewer trunk line would convey sewer flows from Vaughn Road to the City's Wastewater Treatment Plant south of the city. Sewer infrastructure depths would vary from 8 to 20 feet in depth.

Drainage/Stormwater Control

The proposed NEQSP amendment defines a Conceptual Drainage Plan solution for the NEQSP area that includes defining a stand-alone drainage solution for The Campus (**Figure 9**). This solution proposes the use of the onsite land area south of Commercial Drive for a new retention basin within the NEQSP plan area that would meet the specific needs of The Campus and allow the proposed project to develop independent of the surrounding properties in the NEQSP area. The proposed retention basin would be 25.14 acres with a volume of approximately 240 acre feet. The proposed basin may be expanded in the future and converted from a retention basin to a city detention basin once the identification of the final city-wide regional storm drainage and conveyance system solution for the NEQSP area is identified. The basin expansion would increase basin capacity to 360 acre feet of storage and would be utilized for the remaining undeveloped NEQSP properties west of Pedrick Road. This proposed basin would have an outfall to the existing culvert at Pedrick Road which is tributary to the Tremont 3 drainage facility. The underlying land use for the detention basin would be CAMU, per the current proposed amendment to the NEQSP. A drainage channel in the northwest corner of the project site, between I-80 and Professional Drive, would further accommodate the bypass of offsite stormwater.

Access and Circulation

Current property access consists of an existing roadway (Pedrick Road) along the eastern boundary of the site. Per the NEQSP, a future 4-lane arterial (Professional Drive) would be located along the site's western and northern boundaries. As provided for in the NEQSP and prior entitlements to the west of the site, the planned extension of Dorset Drive would connect to Professional Drive near the center of The Campus providing the opportunity for direct visual and vehicular/pedestrian connectivity to the numerous commercial and industrial uses currently under development to the west of the project. Campus Parkway would form the north-south spine of The Campus' circulation network.

Also, as defined in the proposed amendment to the NEQSP, the planned Vaughn Road cut-off at the southern end of the project site is proposed as "Commercial Drive" as defined in the original NEQSP. This would allow traffic to travel from Professional Drive to Pedrick Road and allow for the termination of Vaughn Road and eliminating the Vaughn Road Railroad crossing. The intersection of Commercial Drive and Pedrick Road would be located such that it allows maximum flexibility to address the future Pedrick Road over-crossing of the railroad located at the extreme southeastern corner of the project site.

The project proposes the construction of eastern and southern halves of the future 4-lane arterial for Professional Drive allowing for 2-lanes (one in each direction). Professional Drive would be extended south along the west side of the roadway to provide a connection to existing Vaughn Road. Additionally, the project would construct the widening of Pedrick Road adjacent to the project frontage.

Project Phasing

The Campus would ultimately be constructed in three phases to allow for its orderly development (**Figure 10**). A Large-Lot Vesting Tentative Subdivision Map would be utilized to facilitate the development phasing and financing of the required infrastructure improvements along with dedication of roadways as and when appropriate.

Phase 1 Improvements:

The first phase of development would consist of approximately 495 residential units adjacent to Professional Drive and the west side of the project site.

- Construct sewer from Vaughn Road to the project site along Professional Drive.
- Construction drainage retention basin.
- Construction of a 1,500-gpm municipal well.
- Extend 12" water line from well site to the existing 12" water line in Vaughn Road.
- Construct east half of Professional Drive adjacent to the Phase 1 project area.
- Construct the west half of Professional Drive from Commercial Drive to Vaughn Road.
- Construct Campus Parkway.
- Construct Entrance 'A' roadway from Campus Parkway to Pedrick Road.
- Construct E. Dorset Drive from Professional Drive to Campus Parkway.
- Construct Commercial Drive from Professional Drive to Pedrick Road.
- Construction of streetlights, joint trench utilities, water, sewer and drainage facilities and appurtenances with the Phase 1 roadways.
- Construction of residential neighborhoods for Lots 4, 5, 6, 7, and 8.
- Construction of park improvements for Lots 15, 18, and 19.

Phase A Improvements:

- Construct Pedrick Road frontage improvements and roadway widening from Entrance 'A' road to Commercial Drive.
- Construction of streetlights and drainage facilities within Pedrick Road adjacent to the project phase.
- Construction of residential neighborhoods for Lots 1, 2, 3, and 9.
- Construction of park improvement for Lots 16 and 17.

Phase B Improvements:

- Construct the east and south half of Professional drive from the terminus point of Phase 1 to Pedrick Road.
- Construction of streetlights, joint trench utilities, water, sewer and drainage facilities and appurtenances within Professional Drive.
- Construct Pedrick Road frontage improvement and roadway widening from Professional Drive to Entrance 'A' roadway.
- Construction of streetlights and drainage facilities within Pedrick Road adjacent to the project phase.
- Construction of the DOC and commercial parcels on Lots 11 and 12.



Notice of Preparation The Campus Draft Environmental Impact Report

- Construction of park improvement for Lot 14.

Project Applications

The Campus project includes the following proposed entitlement applications to the City, requiring Planning Commission review with final action by the City Council:

- Amendment of the Northeast Quadrant Specific Plan (NEQSP);
- Rezoning of the project site from Professional & Admin Office (PAO-PUD), Neighborhood Commercial (CN-PUD), and Light Industrial (ML-PUD) to Campus Mixed Use Planned Development (CAMU-PD), consistent with the City's recently adopted 2040 General Plan;
- Large-Lot Vesting Tentative Subdivision Map;
- Establish Planned Development standards, including Design Guidelines; and
- Development Agreement.

Draft EIR Analysis

The City will prepare an EIR for The Campus project. The EIR will be prepared in accordance with CEQA, the CEQA Guidelines (Guidelines), relevant case law, and City procedures. No Initial Study will be prepared pursuant to Section 15063(a) of the CEQA Guidelines.

The Draft EIR for the project will incorporate by reference applicable portions of the certified Dixon General Plan 2040 Draft EIR.

The project level EIR will analyze potentially significant impacts associated with adoption and implementation of The Campus project. In particular, the EIR will focus on the project's increased development potential. The EIR will evaluate the full range of environmental issues contemplated under CEQA and the CEQA Guidelines as set forth in CEQA Guidelines Appendix G, except for specific topics identified below as having no impact. Where potentially significant or significant impacts are identified, the EIR will discuss mitigation measures to address the impact. At this time, the City anticipates that EIR sections will be organized in the following topical areas:

- **Aesthetics** – The Draft EIR will describe the aesthetic implications of project implementation, including visual relationships to the surrounding vicinity and potential impacts on scenic vistas and resources, potential to conflict with regulations governing scenic quality, and light or glare impacts.
- **Agricultural Resources** – The Draft EIR will describe the character of the region's agricultural lands, including maps of prime farmlands, other important farmland classifications, and protected farmland (including Williamson Act contracts). This section will provide an analysis including the methodology, thresholds of significance, project impact analysis, cumulative impact analysis, and a discussion of feasible mitigation measures that should be implemented to offset the loss of agricultural lands and Williamson Act cancellations as a result of project implementation.
- **Air Quality** – The Draft EIR will describe the potential short- and long-term impacts of project implementation on local and regional air quality and air quality plans based on methodologies issued by the Yolo-Solano Air Quality Management District (YSAQMD).
- **Biological Resources** – The Draft EIR will identify any potential impacts of project implementation on biological resources, including special-status plant and animal species, riparian habitats, wetlands, other sensitive natural communities, migratory movement, and protected trees.

Notice of Preparation The Campus Draft Environmental Impact Report



- **Cultural and Tribal Cultural Resources** – The Draft EIR will describe project implementation impacts and mitigation associated with cultural, historic, archaeological, and tribal cultural resources.
- **Energy** – The Draft EIR will provide an analysis to determine whether the proposed project would result in a significant impact on energy use if it would result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or conflict with or obstruct a state or local plan for renewable energy or energy efficiency.
- **Geology, Soils, and Seismicity** – The Draft EIR will describe the potential geotechnical implications of project implementation, including adverse effects associated with seismic activity, substantial soil erosion or loss of topsoil, stable, potentially unstable geologic units, and destruction of unique paleontologic resources or unique geological features.
- **Greenhouse Gases and Climate Change** – The Draft EIR will include a greenhouse gas emissions analysis using the YSAQMD’s methodology and guidance for evaluating a project’s greenhouse gas emissions and will address the potential for the project to conflict with an adopted plan or other regulations adopted for the purpose of reducing greenhouse gases.
- **Hazards and Hazardous Materials** – The Draft EIR will describe any existing and anticipated hazardous material activities and releases and any associated impacts of project implementation. Potential hazards impacts resulting from future construction will also be described.
- **Hydrology and Water Quality** – The Draft EIR will describe the effects of project implementation on storm drainage, water quality, groundwater resources, and the potential for flooding.
- **Land Use and Planning** – The Draft EIR will describe the potential impacts of project implementation related to land use and planning, including impacts due to conflict with land use plans, policies, or regulations adopted to avoid or mitigate an environmental effect.
- **Noise** – The Draft EIR will describe noise impacts and related mitigation needs associated with short-term construction and long-term operation (i.e., traffic, mechanical systems, etc.) associated with the project.
- **Population and Housing** – The Draft EIR will describe the anticipated effects of project implementation inducing unplanned population growth or displacing existing people or housing.
- **Public Services and Recreation** – The Draft EIR will describe the potential for project implementation to result in substantial adverse physical impacts on public services, including police, fire and emergency medical services, schools, parks and recreation facilities, and other public facilities.
- **Transportation** – The Draft EIR will describe the transportation and circulation implications of project implementation, including impacts on the circulation system including transit, roadways, pedestrian and bicycle facilities, potential effects related to vehicle miles traveled, design or incompatible use hazards, and adequate emergency access.
- **Utilities and Service Systems** – The Draft EIR will describe project implementation effects related to new or expanded water supply, sewer and wastewater treatment, storm drainage, solid waste and recycling, electric, natural gas, and telecommunication infrastructure.



Notice of Preparation The Campus Draft Environmental Impact Report

- **Wildfire** – The Draft EIR will describe project impacts related to emergency response/emergency evacuation plans, potential to exacerbate wildfire risks, and exposure to significant wildfire-related risks.

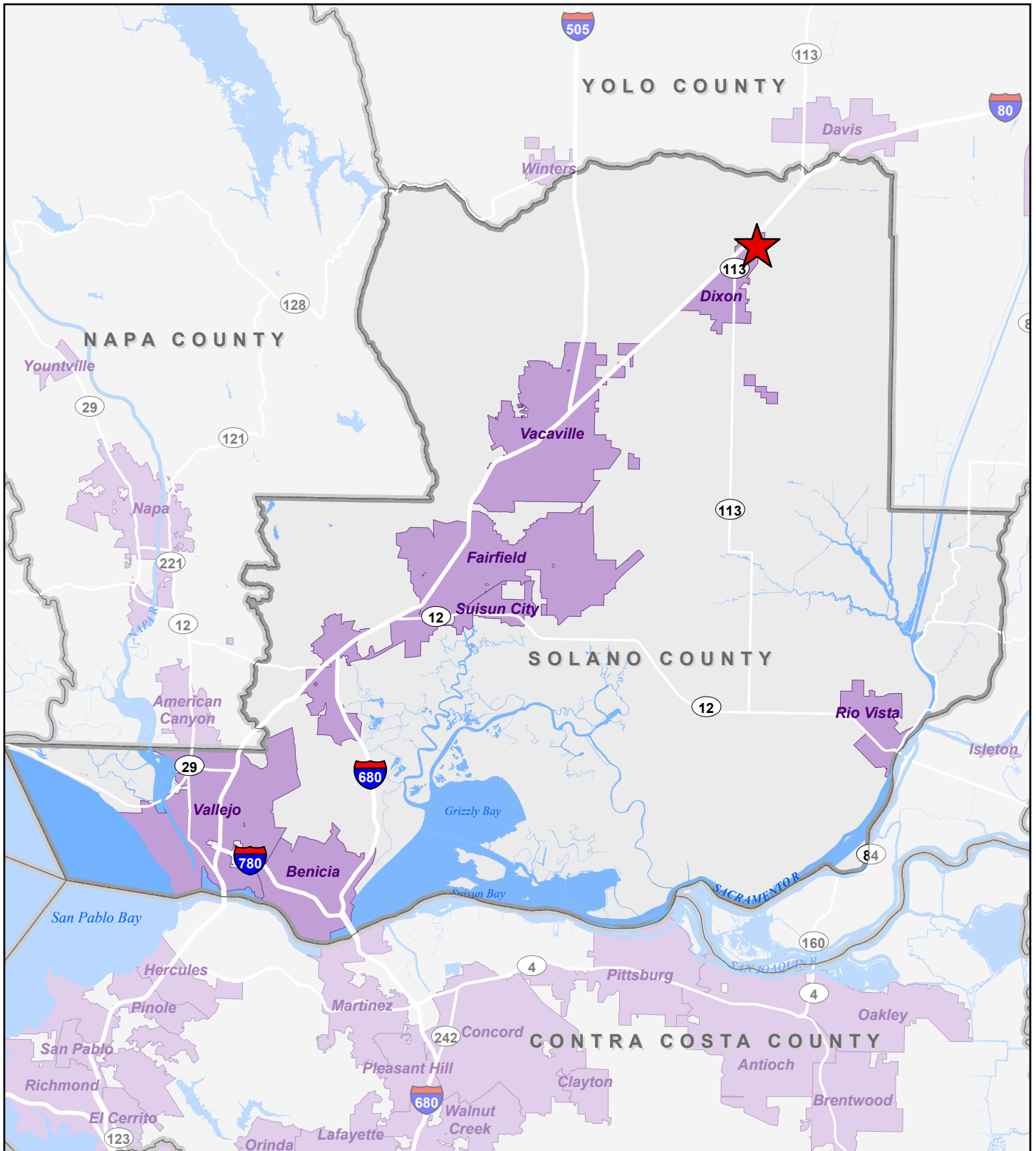
In addition to the potential environmental impacts noted above, the Draft EIR will evaluate potential cumulative impacts and potential growth-inducing effects associated with project implementation. The Draft EIR will also compare the impacts of the project to a range of reasonable alternatives, including a No Project alternative, and will identify an environmentally superior alternative.

Environmental Topics Scoped from Further Analysis Forestry Resources




The EIR certified for the Dixon General Plan 2040 in 2021 concluded there would be no impacts to forestry resources. No land zoned or used as forestry resources or timberland are in the city. Therefore, no forestry impacts would occur as a result of implementing the project and this issue will not be discussed in the EIR.

Mineral Resources

The EIR certified for the Dixon General Plan 2040 in 2021 concluded that there would be no impacts to mineral resources. Other than a few existing idle oil wells, there are no mineral resources identified in the city and, therefore, no potential impacts on this type of resource. Therefore, there would be no impact on mineral resources, and this impact will not be discussed in the EIR.

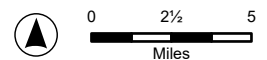


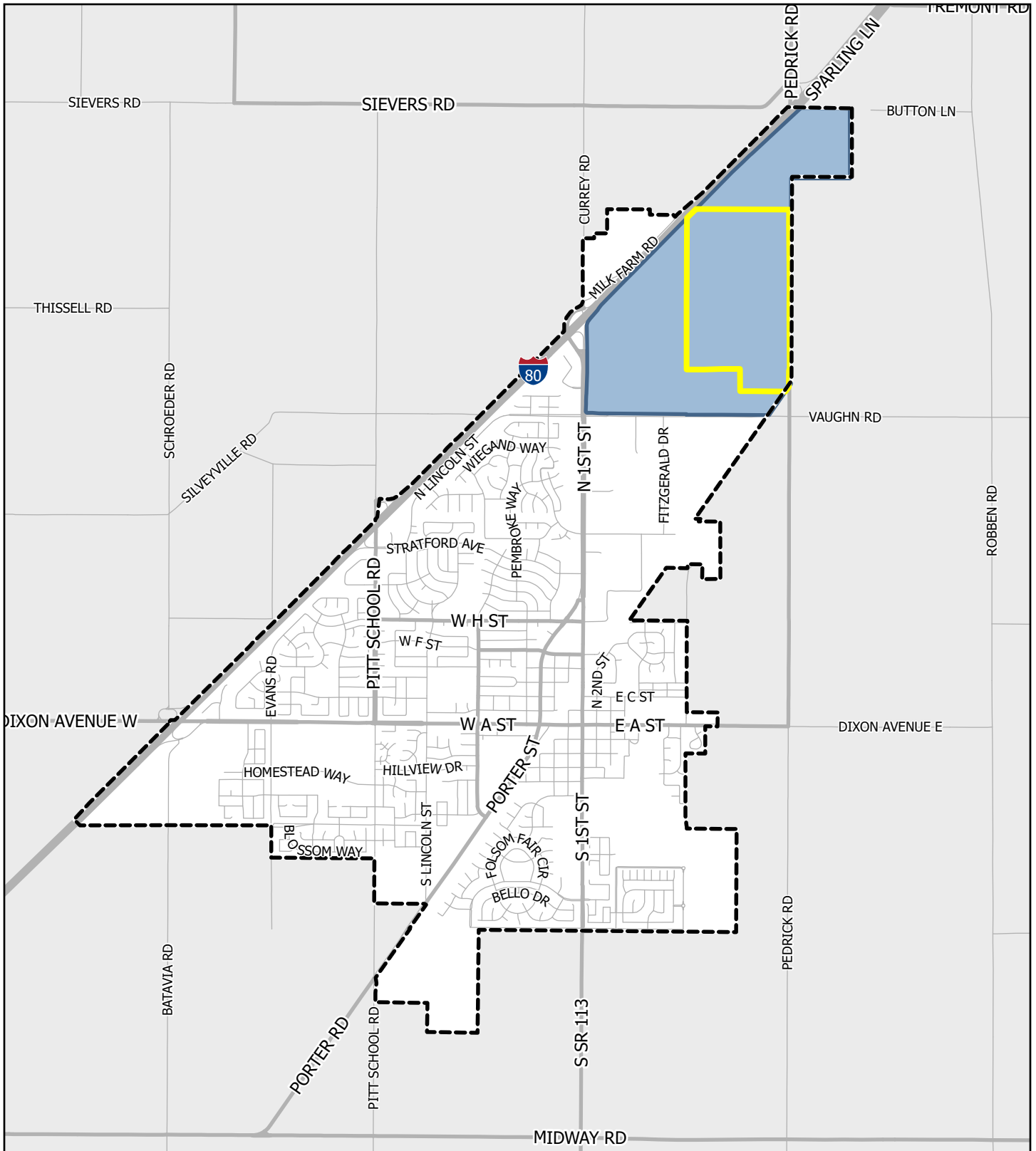
LEGEND

-  Project Location
-  Incorporated Area
-  County Boundary




THE CAMPUS

Figure 1. Regional Location Map



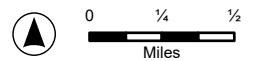


LEGEND

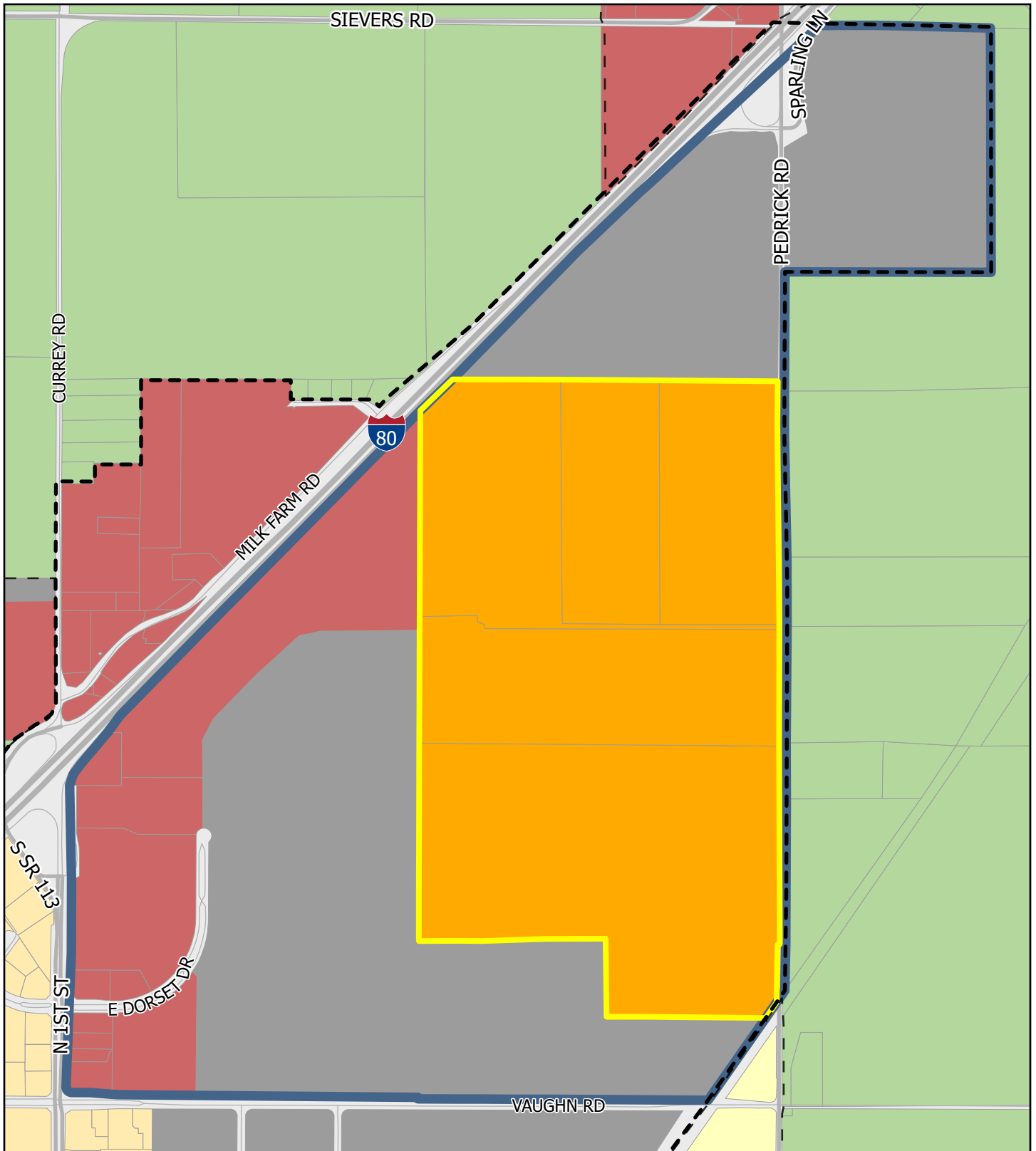
-  City of Dixon
-  Northeast Quadrant Specific Plan Area
-  The Campus Project Site

THE CAMPUS

Figure 2. Proposed Project Site



Sources: Solano County GIS; Dixon General Plan 2040.
Map date: July 31, 2023.

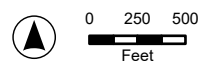


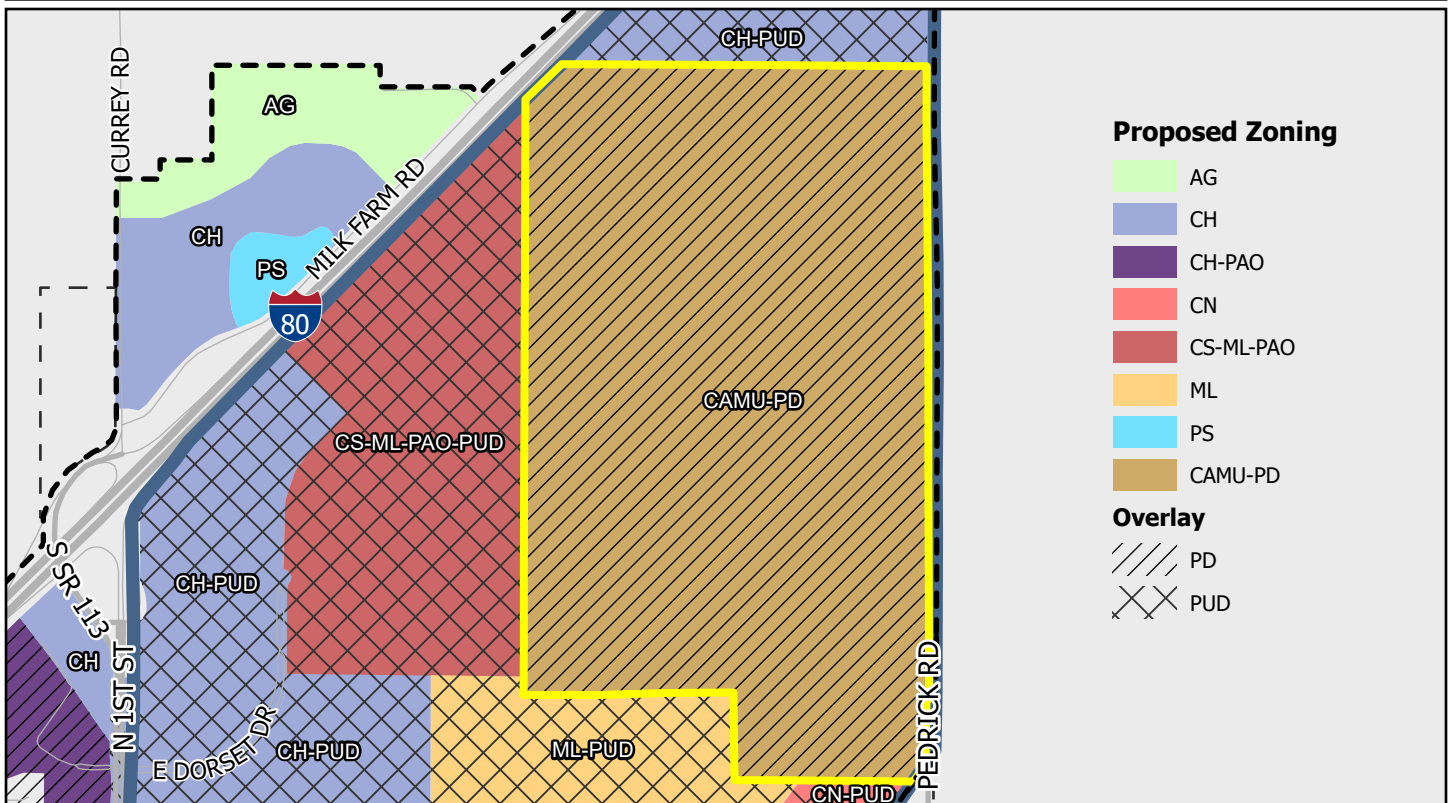
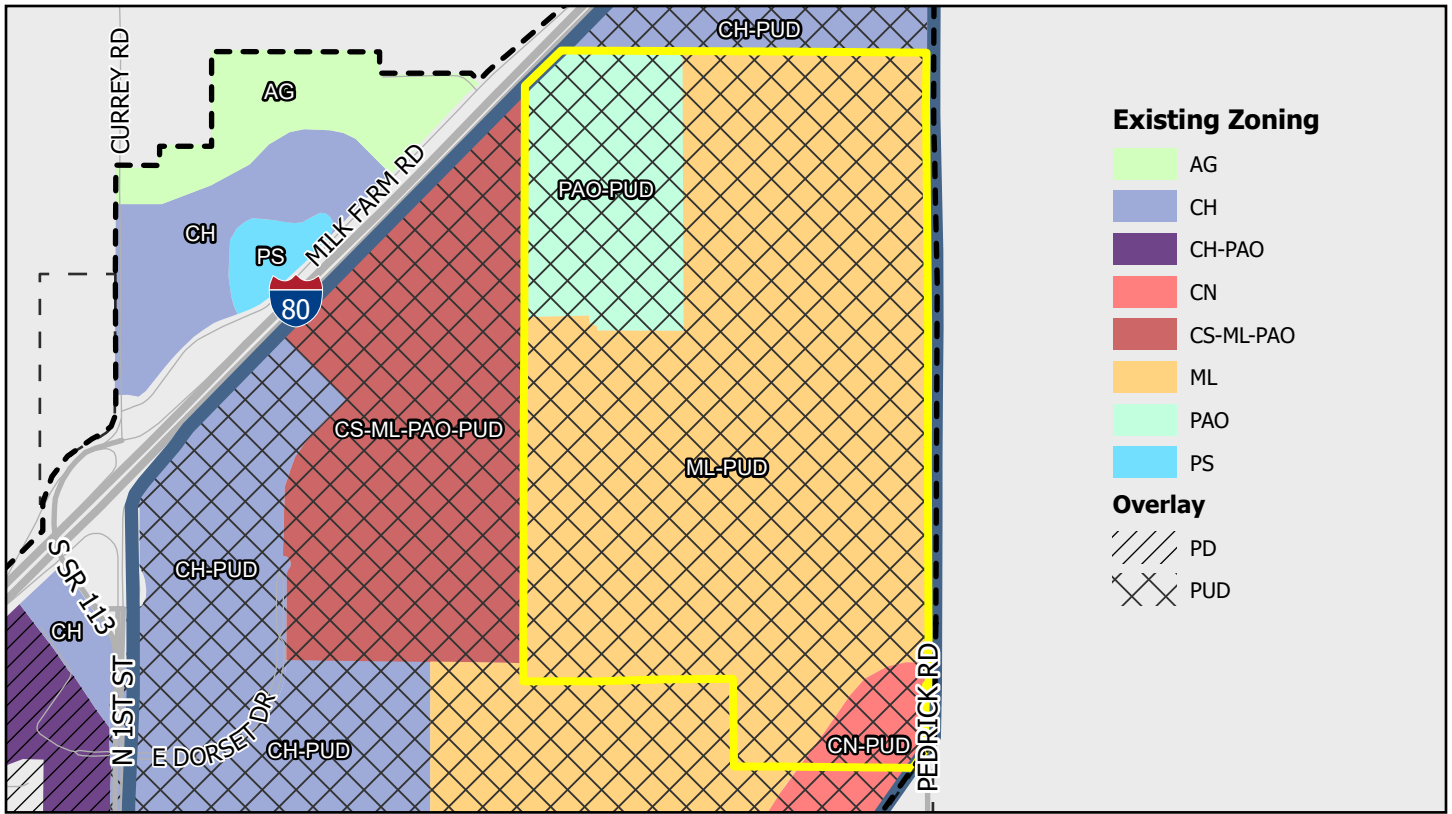
LEGEND

-  City of Dixon
-  Sphere of Influence
-  Northeast Quadrant Specific Plan Area
-  The Campus Project Site
-  Campus Mixed Use
-  Corridor Mixed Use
-  Regional Commercial
-  Industrial
-  Low Density Residential
-  Medium Density Residential
-  Agricultural (County Designation)

THE CAMPUS

Figure 3. Land Use Designations



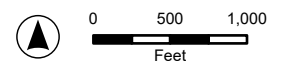


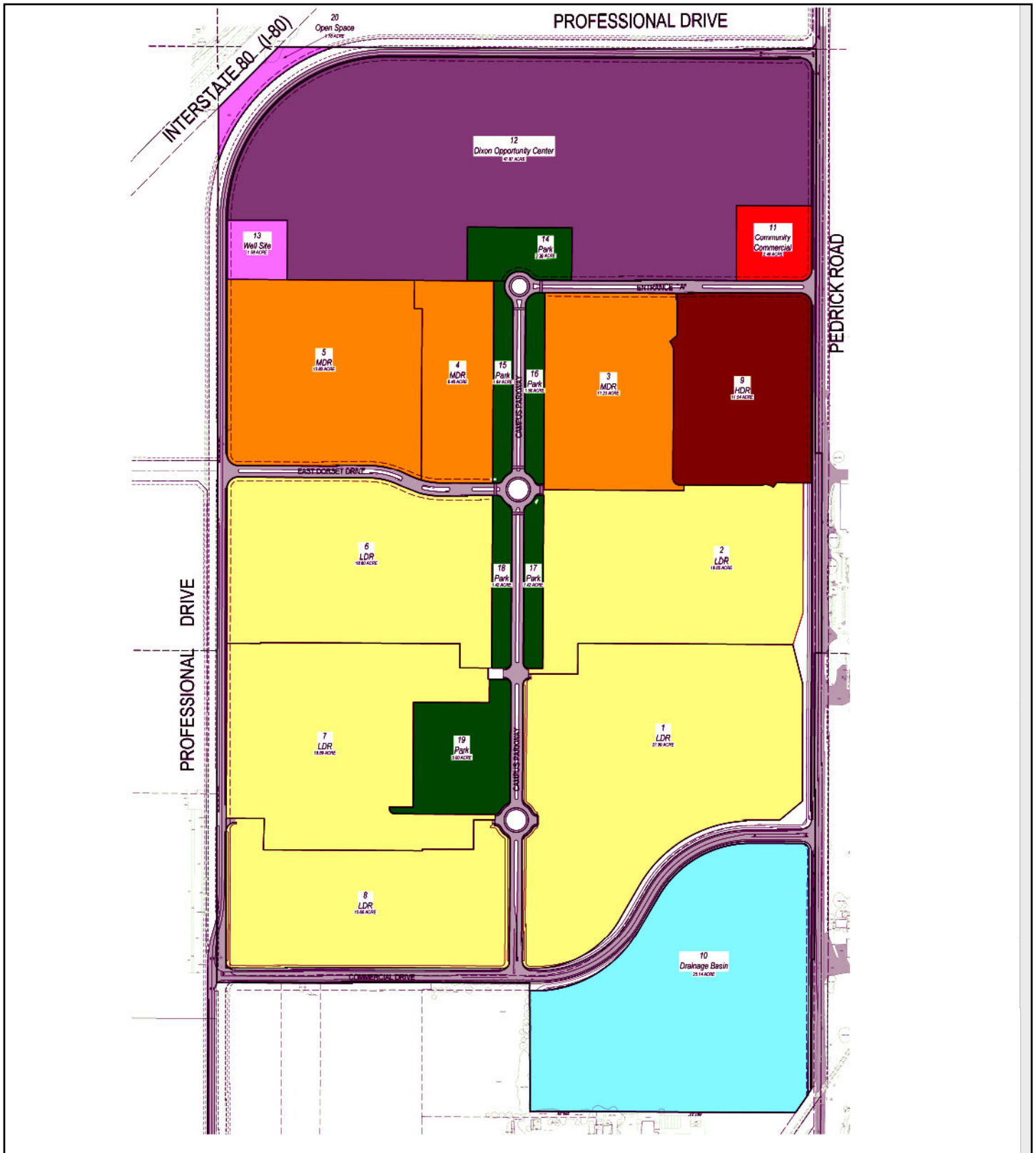
LEGEND

- City of Dixon
- Sphere of Influence
- Northeast Quadrant Specific Plan Area
- The Campus Project Site

THE CAMPUS

Figure 4. Existing and Proposed Zoning



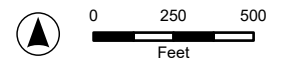


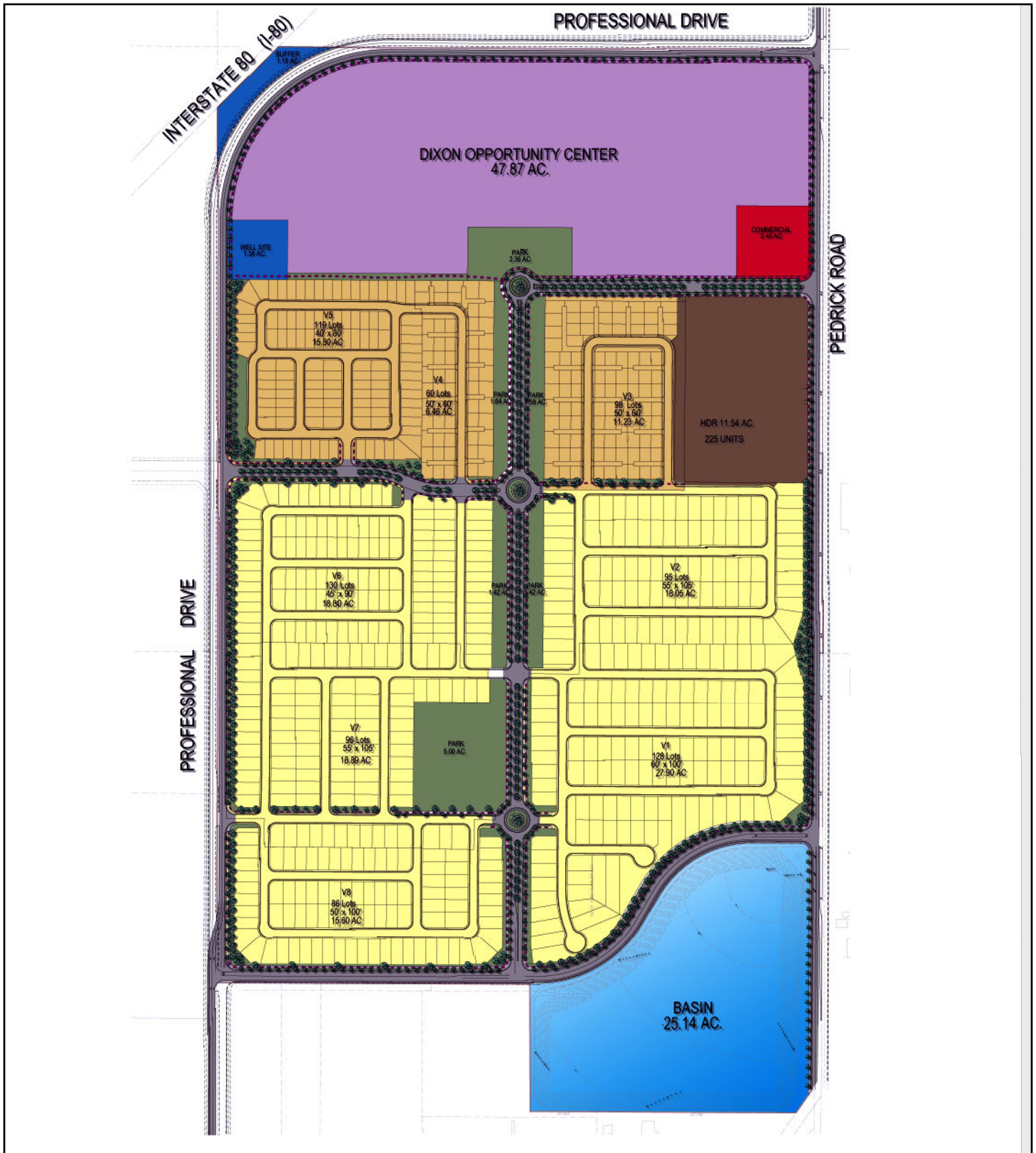
LEGEND

- Low Density Residential
- Medium Density Residential
- High Density Residential
- Community Commercial
- Dixon Opportunity Center
- Park
- Drainage Basin
- Other









THE CAMPUS

Figure 5. Proposed Site Plan





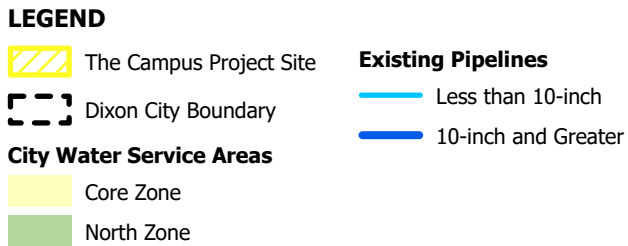
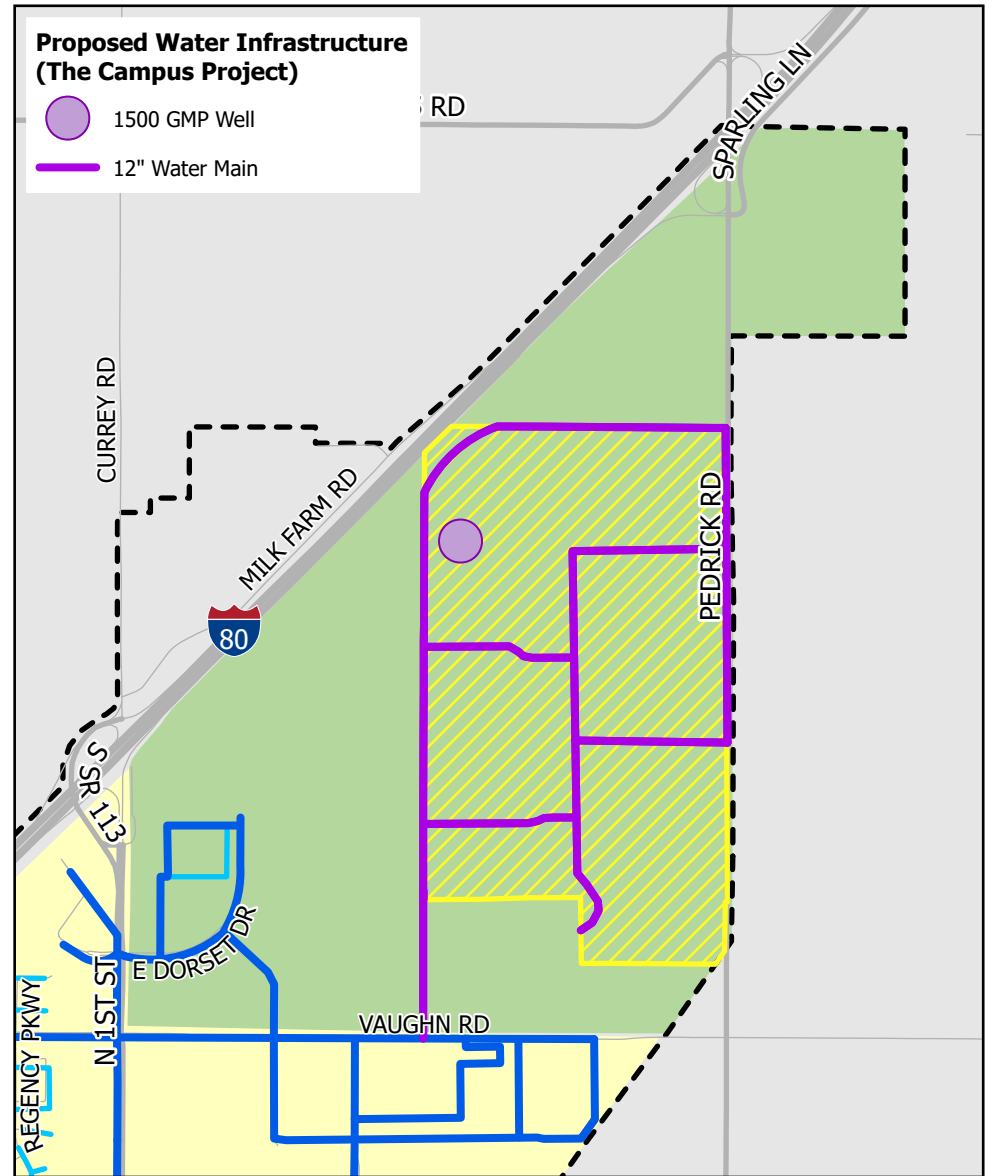
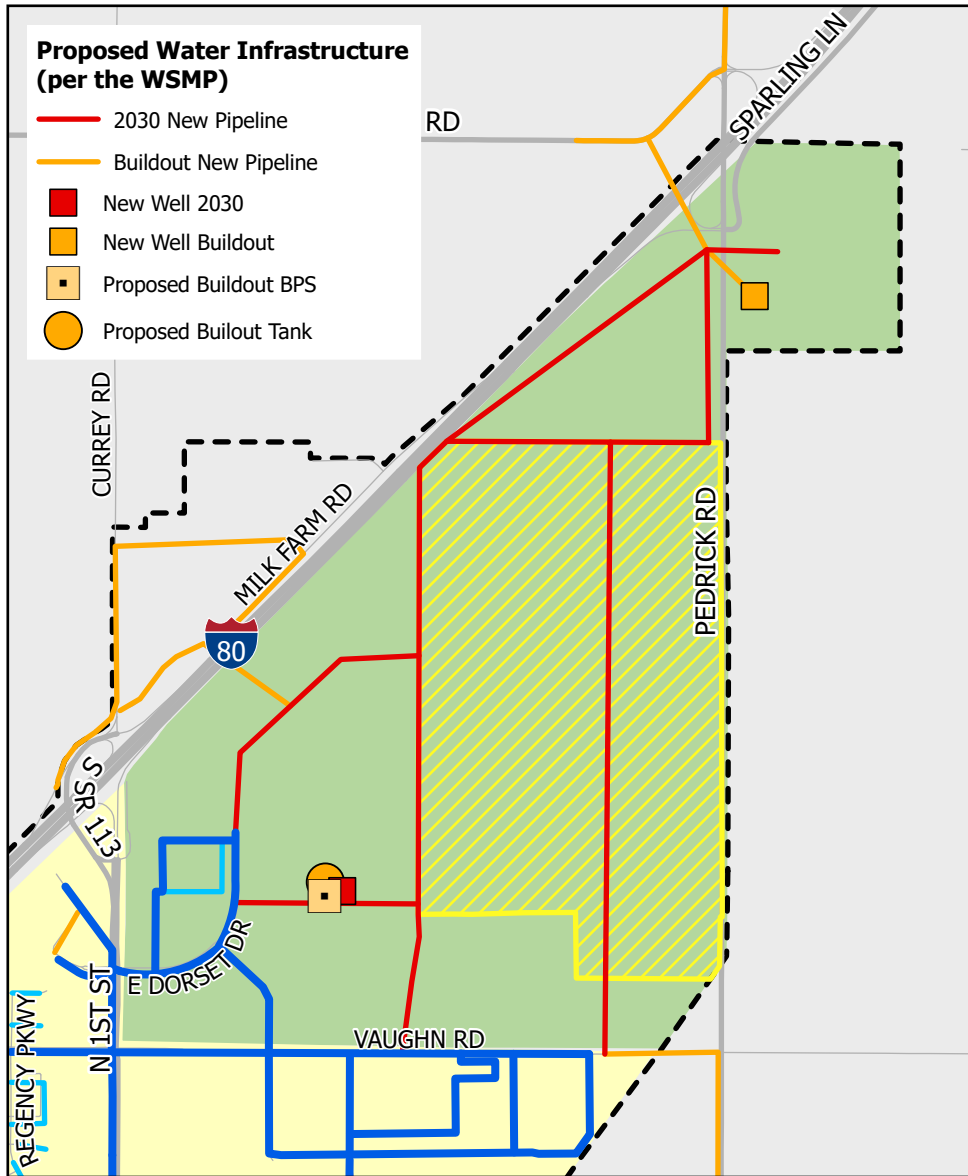
LEGEND

- | | |
|---|--|
|  Low Density Residential |  Dixon Opportunity Center |
|  Medium Density Residential |  Park |
|  High Density Residential |  Drainage Basin |
|  Community Commercial |  Other |

THE CAMPUS

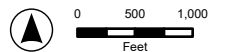
Figure 6. Illustrative Land Use Plan



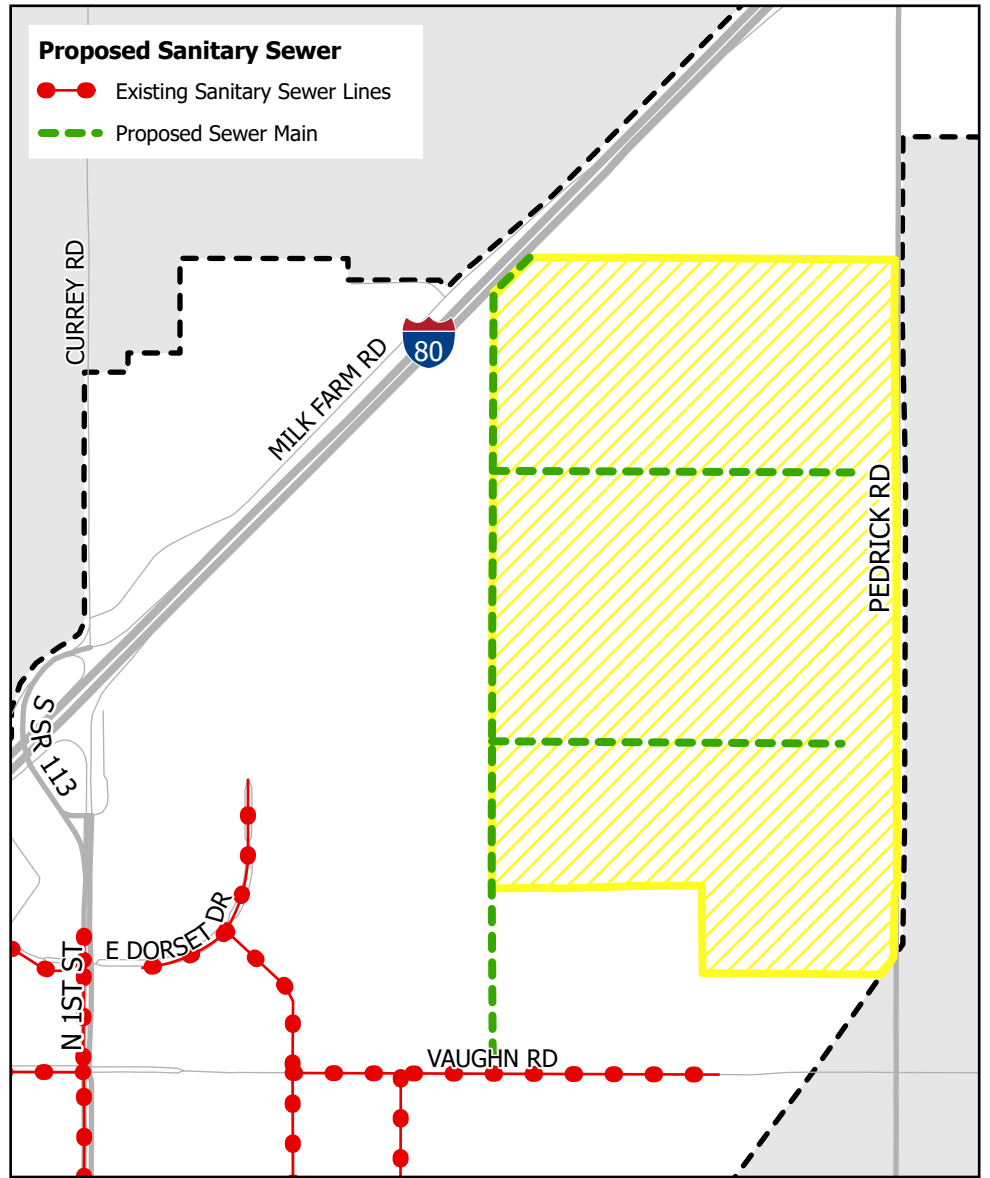
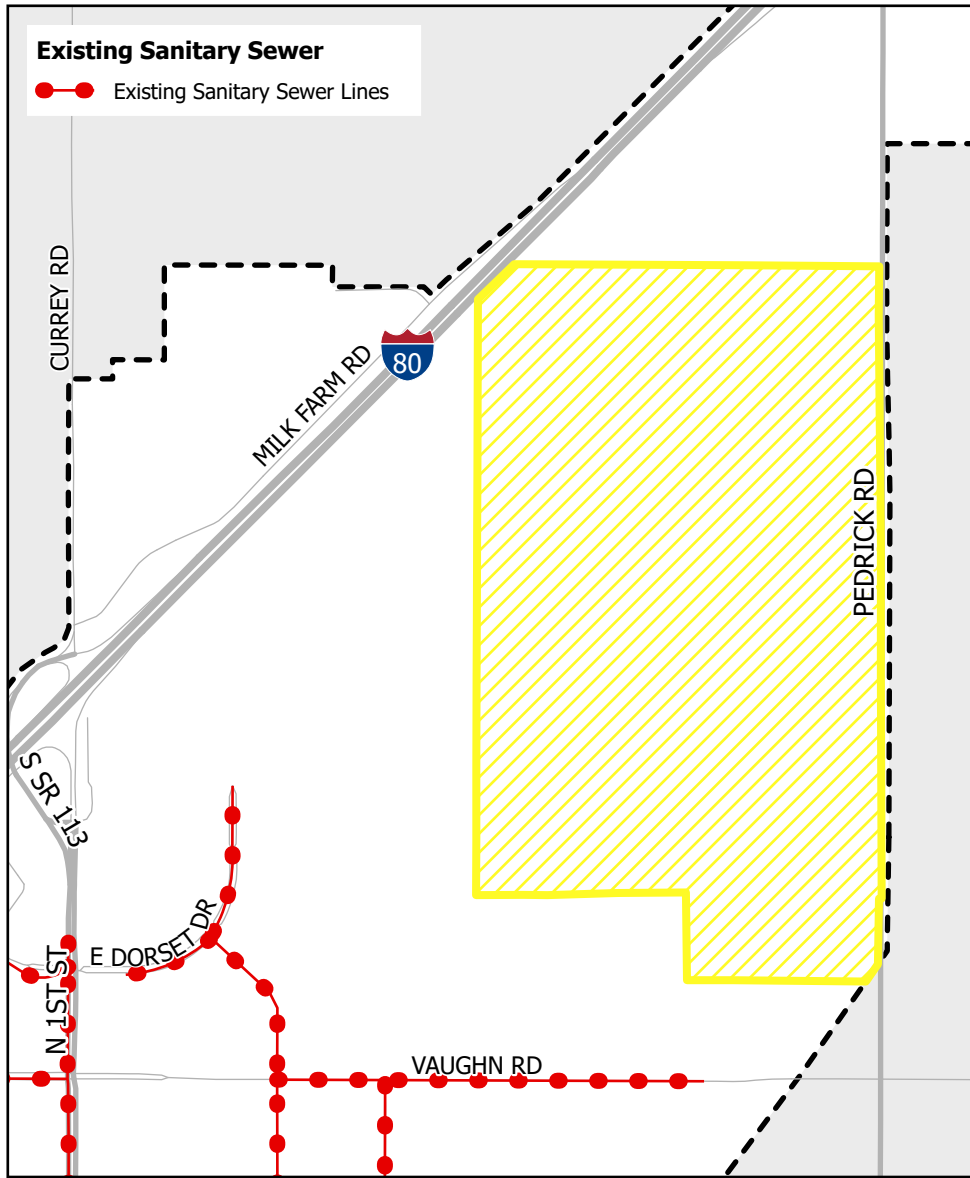


THE CAMPUS

Figure 7. Water Distribution System



Sources: City of Dixon, California, Dixon 257 Draft Water Study, July 2023, prepared by Morton & Pitalo. Map date: August 1, 2023.

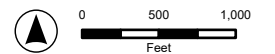


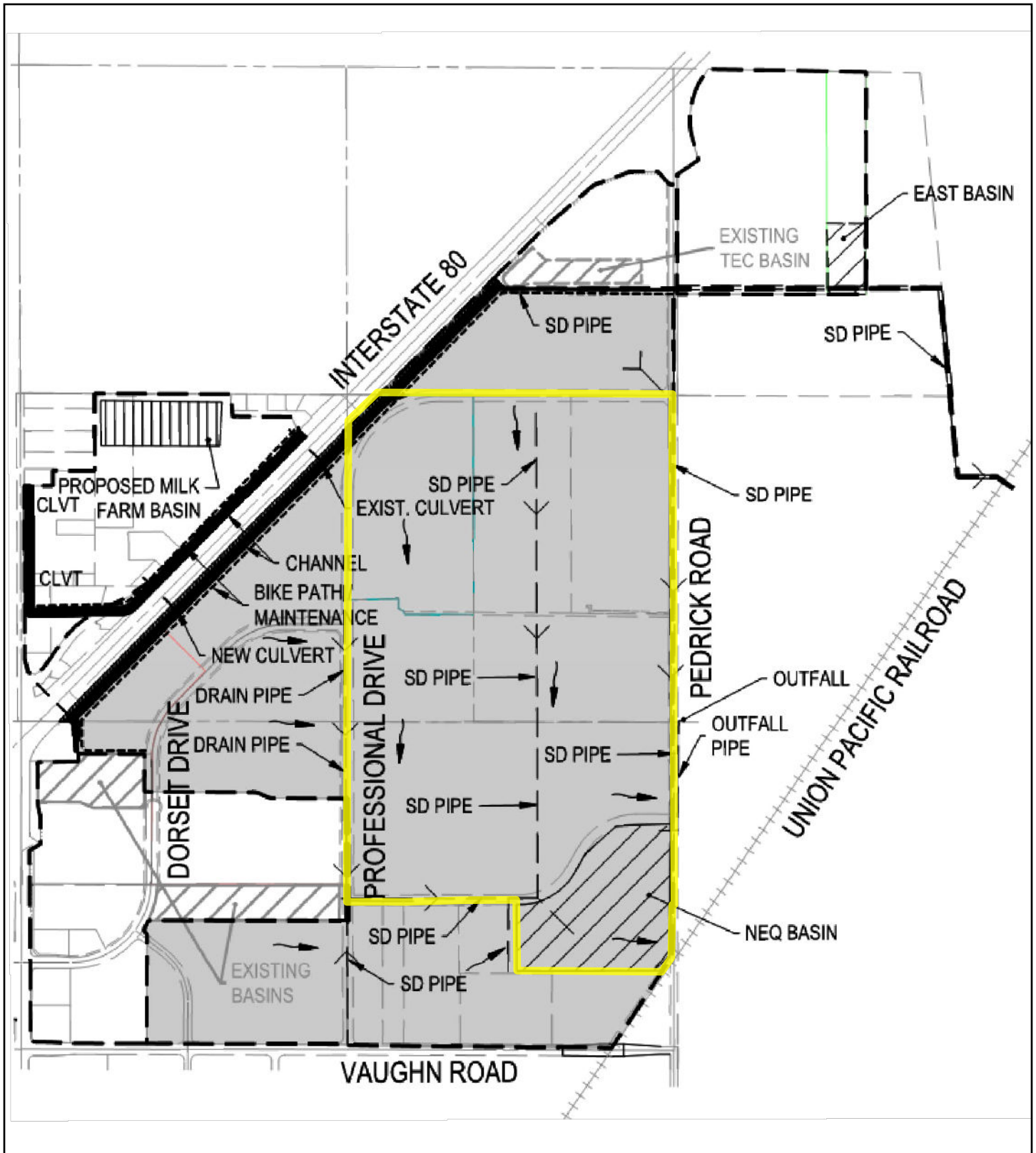
LEGEND

- The Campus Project Site
- Dixon City Boundary




THE CAMPUS

Figure 8. Wastewater System



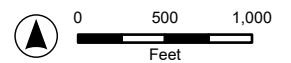


LEGEND

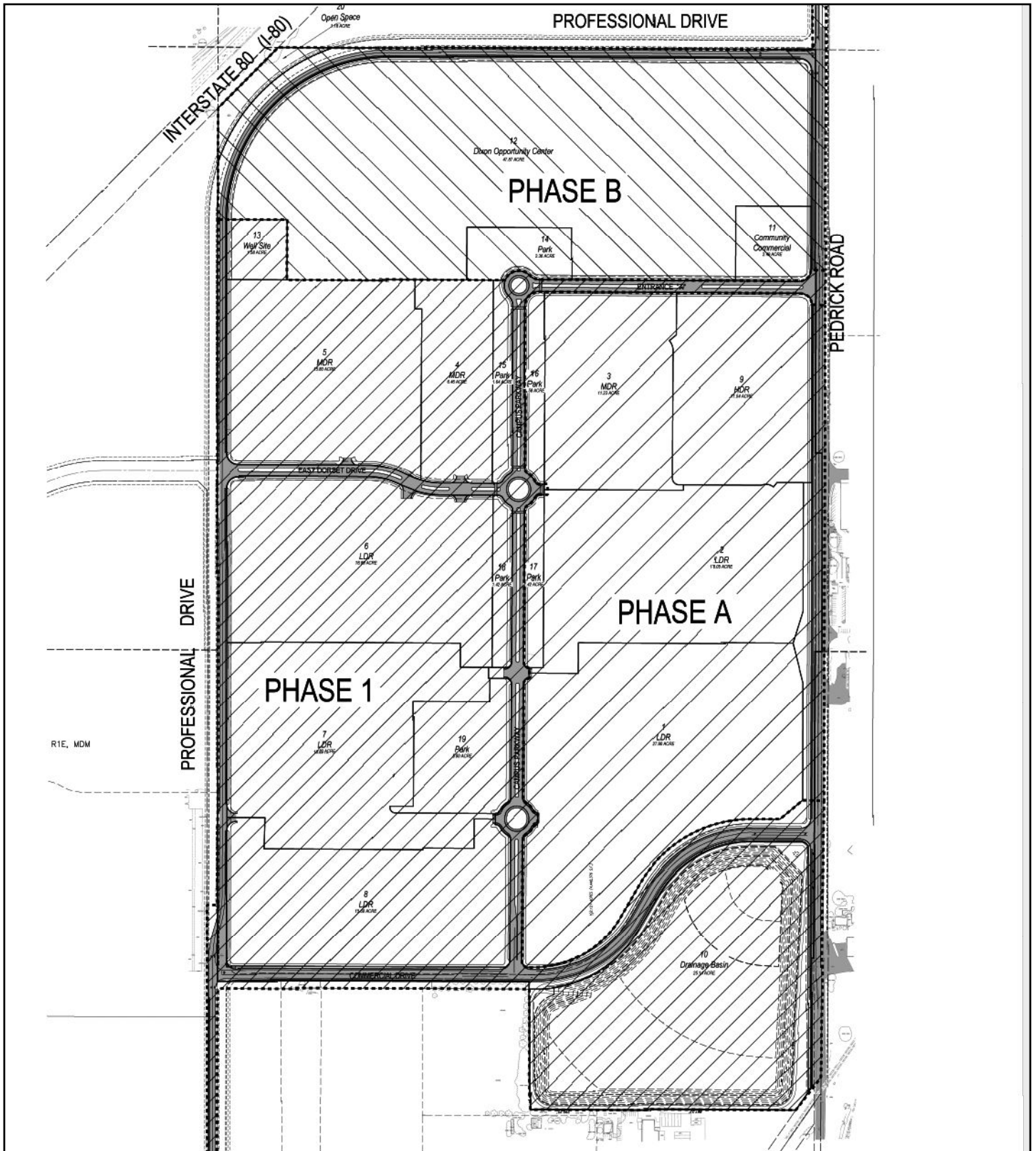
-  The Campus Project Site
-  Drainage Pipe (size is schematic)
-  Site Flow Direction
- SD Storm Drain

THE CAMPUS




Figure 9. Proposed NEQSP Drainage System



Sources: City of Dixon Northeast Quadrant Specific Plan, Figure 6-4 Conceptual Drainage Schematic, Revised 5-5-2023. Map date: July 31, 2023.

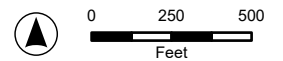


LEGEND

-  Phase 1
-  Phase A
-  Phase B

THE CAMPUS

Figure 10. Proposed Phasing Plan





NATIVE AMERICAN HERITAGE COMMISSION

August 30, 2023

Raffi Boloyan
City of Dixon
600 East A. St.
Dixon, CA 95620

Re: 2023080739, The Campus Project, Solano County

CHAIRPERSON
Reginald Pagaling
Chumash

VICE-CHAIRPERSON
Buffy McQuillen
Yokayo Pomo, Yuki,
Nomlaki

SECRETARY
Sara Dutschke
Miwok

PARLIAMENTARIAN
Wayne Nelson
Luiseño

COMMISSIONER
Isaac Bojorquez
Ohlone-Costanoan

COMMISSIONER
Stanley Rodriguez
Kumeyaay

COMMISSIONER
Vacant

COMMISSIONER
Vacant

COMMISSIONER
Vacant

EXECUTIVE SECRETARY
**Raymond C.
Hitchcock**
Miwok, Nisenan

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

Dear Mr. Boloyan:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 {d}; Cal. Code Regs., tit. 14, § 5064 subd.(a){1} (CEQA Guidelines §15064 (a){1})). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

- 1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

 - a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
 - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
- 2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).

 - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
- 3. Mandatory Topics of Consultation if Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).
- 4. Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:

 - a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
- 5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
- 6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

 - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:

- a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
- b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

- a.** Avoidance and preservation of the resources in place, including, but not limited to:
 - i.** Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
- b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i.** Protecting the cultural character and integrity of the resource.
 - ii.** Protecting the traditional use of the resource.
 - iii.** Protecting the confidentiality of the resource.
- c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
- d.** Protecting the resource. (Pub. Resource Code §21084.3 (b)).
- e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
- f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

- a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
- b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
- c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (https://ohp.parks.ca.gov/?page_id=30331) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: Pricilla.Torres-Fuentes@nahc.ca.gov.

Sincerely,

Pricilla Torres-Fuentes

Pricilla Torres-Fuentes
Cultural Resources Analyst

cc: State Clearinghouse

The Campus/NOP Comments

Sherri Metzker <SMetzker@cityofdavis.org>

Tue 9/12/2023 11:38 AM

To: Raffi Boloyan <rboloyan@cityofdixon.us>

Raffi,

Thank you for this opportunity to comment on your proposed project. I see in the project description that part of the project is designed to attract new businesses to Dixon. I presume that many of those businesses will be in the research and development field because of the relative access to the UC Davis campus. Therefore, I would like to request that your traffic analysis study the impact of the proposed project on the Pedrick Road to Hutchinson Drive / Russell Road access as well as the impacts to eastbound Interstate 80.

Thank you for your consideration.

SHERRI A. METZKER

Community Development Director

MAIN: [530-757-5610](tel:530-757-5610), ext. 7239

MOBILE: [530-302-6372](tel:530-302-6372)

smetzker@cityofdavis.org

Community Development & Sustainability
23 Russell Blvd.
Davis, CA 95616

CITYOFDAVIS.ORG    





State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Bay Delta Region
2825 Cordelia Road, Suite 100
Fairfield, CA 94534
(707) 428-2002
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



September 21, 2023

Raffi Boloyan
City of Dixon
600 East A Street
Dixon, CA 95620
RBoloyan@cityofdixon.us

Subject: The Campus, Notice of Preparation of a Draft Environmental Impact Report,
SCH No. 2023080739, City of Dixon, Solano County

Dear Mr. Boloyan:

The California Department of Fish and Wildlife (CDFW) received a Notice of Preparation (NOP) of a draft Environmental Impact Report (EIR) from the City of Dixon (City) for The Campus (Project).

CDFW is providing the City, as the Lead Agency, with specific detail about the scope and content of the environmental information related to CDFW's area of statutory responsibility that must be included in the EIR (Cal. Code Regs., tit. 14, § 15082, subd. (b)).

CDFW ROLE

CDFW is a **Trustee Agency** with responsibility under the California Environmental Quality Act (CEQA) for commenting on projects that could impact fish, plant, and wildlife resources (Pub. Resources Code, § 21000 et seq.; Cal. Code Regs., tit. 14, § 15386). CDFW is also considered a **Responsible Agency** if a project would require discretionary approval, such as a permit pursuant to the California Endangered Species Act (CESA) or Native Plant Protection Act (NPPA), the Lake and Streambed Alteration (LSA) Program, and other provisions of the Fish and Game Code that afford protection to the state's fish and wildlife trust resources. Pursuant to our authority, CDFW has the following concerns, comments, and recommendations regarding the Project.

PROJECT DESCRIPTION AND LOCATION

The Project would develop a phased, mixed-use development on approximately 260 acres of farmland. The development would consist of 47.87 acres of light industrial business park/tech campus (the Dixon Opportunity Center), 2.49 acres of light commercial use, 11.54 acres of high-density residential use, 33.49 acres of medium-density residential use, 99.24 acres of low-density residential use, 8.42 acres of recreational parks and open space, 27.90 acres of water and drainage infrastructure,

Raffi Boloyan
City of Dixon
September 21, 2023
Page 2

and 23.66 acres of road and road right-of-way. The Project would include development of water, sewage, drainage and stormwater control facilities.

The Project would also rezone the site, currently zoned as Professional & Admin Office (PAO-PUD), Neighborhood Commercial (CN-PUD), and Light Industrial (ML-PUD), to Campus Mixed Use Planned Development (CAMU-PD).

The Project is located in northeast Dixon, with a center point of approximately 38.477517 °N, -122.807619 °W. The Project site is comprised of Assessor Parcel Numbers 0111-040-010, 0111-040-020, 0111-040-030, 0111-040-040, and 0111-080-050.

The CEQA Guidelines (Cal. Code Regs., tit. 14, § 15000 et seq.) require that the EIR incorporate a full Project description, including reasonably foreseeable future phases of the Project, that contains sufficient information to evaluate and review the Project's environmental impact (CEQA Guidelines, §§ 15124 & 15378). Please include a complete description of the following Project components in the Project description:

- Land use changes resulting from, for example, rezoning certain areas;
- Footprints of permanent Project features and temporarily impacted areas, such as staging areas and access routes;
- Area and plans for any proposed buildings/structures, ground disturbing activities, fencing, paving, stationary machinery, landscaping, and stormwater systems;
- Operational features of the Project, including level of anticipated human presence (describe seasonal or daily peaks in activity, if relevant), artificial lighting/light reflection, noise, traffic generation, and other features; and
- Construction schedule, activities, equipment, and crew sizes.

REGULATORY REQUIREMENTS

California Endangered Species Act

Please be advised that a CESA Incidental Take Permit (ITP) must be obtained if the Project has the potential to result in "take" of plants or animals listed under CESA, either during construction or over the life of the Project. Under CESA, "take" means "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." (Fish & G. Code, § 86). If the Project will impact CESA listed species, such as those identified in **Attachment 1**, early consultation is encouraged, as significant modification to the Project and mitigation measures may be required in order to obtain CESA ITP. CDFW's

Raffi Boloyan
City of Dixon
September 21, 2023
Page 3

issuance of an ITP is subject to CEQA and to facilitate permit issuance, any such project modifications and mitigation measures must be incorporated into the EIR's analysis, discussion, and mitigation monitoring and reporting program.

CEQA requires a Mandatory Finding of Significance if a project is likely to substantially restrict the range or reduce the population of a threatened or endangered species (Pub. Resources Code, §§ 21001, subd. (c) & 21083; CEQA Guidelines, §§ 15380, 15064, & 15065). In addition, pursuant to CEQA, the Lead Agency cannot approve a project unless all impacts to the environment are avoided or mitigated to less-than-significant levels, or the Lead Agency makes and supports Findings of Overriding Consideration (FOC) for impacts that remain significant despite the implementation of all feasible mitigation. FOC under CEQA, however, do not eliminate the Project proponent's obligation to comply with the Fish and Game Code.

Lake and Streambed Alteration

An LSA Notification, pursuant to Fish and Game Code sections 1600 et. seq., is required for Project activities affecting lakes or streams and associated riparian habitat. Notification is required for any activity that will substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank including associated riparian or wetland habitat; or deposit or dispose of material where it may pass into a river, lake or stream. Work within ephemeral streams, washes, watercourses with a subsurface flow, and floodplains are subject to notification requirements. CDFW may not execute the final LSA Agreement until it has considered the final EIR and complied with its responsibilities as a responsible agency under CEQA.

ENVIRONMENTAL SETTING

The EIR should provide sufficient information regarding the environmental setting ("baseline") to understand the Project's, and its alternative's (if applicable), potentially significant impacts on the environment (CEQA Guidelines, §§ 15125 & 15360).

CDFW recommends that the CEQA document prepared for the Project provide baseline habitat assessments for special-status plant, fish and wildlife species located and potentially located within the Project area and surrounding lands, including, but not limited to, all rare, threatened, or endangered species (CEQA Guidelines, § 15380). The EIR should describe aquatic habitats, such as wetlands or waters of the U.S. or State, and any sensitive natural communities or riparian habitat occurring on or adjacent to the Project site (for sensitive natural communities see: <https://wildlife.ca.gov/Data/VegCAMP/NaturalCommunities#sensitive%20natural%20communities>), and any stream or wetland set back distances the City may require. Fully protected, threatened or endangered, candidate, and other special-status species that are known to occur, or have the potential to occur in or near the Project site, include, but are not limited to, those listed in **Attachment 1**.

Raffi Boloyan
City of Dixon
September 21, 2023
Page 4

Habitat descriptions and the potential for species occurrence included in the EIR should include robust information from multiple sources: aerial imagery, historical and recent survey data, field reconnaissance, scientific literature and reports, draft Solano Multispecies Habitat Conservation Plan (HCP), U.S. Fish and Wildlife Service's (USFWS) Information, Planning, and Consultation System, California Aquatic Resources Inventory, and findings from "positive occurrence" databases such as California Natural Diversity Database (CNDDDB). Only with sufficient data and information from the habitat assessment, can the City adequately assess which special-status species are likely to occur on or near the Project site, and whether they could be impacted by the Project.

CDFW recommends that prior to Project implementation, surveys be conducted for special-status species with potential to occur, following recommended survey protocols if available. Survey and monitoring protocols and guidelines are available at: <https://www.wildlife.ca.gov/Conservation/Survey-Protocol>.

Botanical surveys for special-status plant species, including those with a California Rare Plant Rank (<http://www.cnps.org/cnps/rareplants/inventory/>)¹, must be conducted during the blooming period within the Project area and adjacent habitats that may be indirectly impacted by, for example, changes to hydrological conditions, and require the identification of reference populations. More than one year of surveys may be necessary based on environmental conditions. Please refer to CDFW protocols for surveying and evaluating impacts to special-status plants available at: <https://www.wildlife.ca.gov/Conservation/Plants>.

Surveys for special-status species should consider the potential for impacting species outside of the Project area. For example, the Project may cause auditory or visual disturbances above ambient levels that may result in nest abandonment and loss of eggs, even if the nest is outside of the Project footprint.

IMPACT ANALYSIS AND MITIGATION MEASURES

The EIR should discuss all direct and indirect impacts (temporary and permanent) that may occur with implementation of the Project (CEQA Guidelines, § 15126.2). This includes evaluating and describing impacts such as:

- Land use changes that would reduce open space or agricultural land uses and increase residential or other land use involving increased development;

¹ California Rare Plant Rank (CRPR) 1B plants are considered rare, threatened, or endangered in California and elsewhere. Further information on CRPR ranks is available in CDFW's *Special Vascular Plants, Bryophytes, and Lichens List* (<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109383&inline>) and on the California Native Plant Society website (<https://www.cnps.org/rare-plants/cnps-rare-plant-ranks>).

Raffi Boloyan
City of Dixon
September 21, 2023
Page 5

- Encroachments into riparian habitats, wetlands or other sensitive areas;
- Potential for impacts to special-status species;
- Loss or modification of breeding, nesting, dispersal and foraging habitat, including vegetation removal, alternation of soils and hydrology, and removal of habitat structural features (e.g., snags, roosts, vegetation overhanging banks); including foraging, wintering, or breeding habitat for Swainson's hawk (*Buteo swainsoni*) and burrowing owl (*Athene cunicularia*);
- Permanent and temporary habitat disturbances associated with ground disturbance, noise, lighting, reflection, air pollution, traffic or human presence; including impacts to migratory birds caused by lighting and reflective building surfaces; and
- Obstruction of movement corridors, fish passage, or access to water sources and other core habitat features.

Please note that the Project site is within the draft Solano HCP Irrigated Agriculture Conservation Area, and according to the draft Solano HCP Mitigation Measure SH 1 for Swainson's hawk, Irrigated Agriculture Foraging habitat should be mitigated at a ratio of 1:1 (see Section 6.4.8 and Figure 4-21 of the draft Solano HCP at: <https://www.scwa2.com/solano-multispecies-habitat-conservation-plan/>).

The EIR should also identify existing and reasonably foreseeable future projects in the Project vicinity, disclose any cumulative impacts associated with these Projects, determine the significance of each cumulative impact, and assess the significance of the Project's contribution to each impact (CEQA Guidelines, §15355). Although a project's impacts may be insignificant individually, its contributions to a cumulative impact may be considerable; a contribution to a significant cumulative impact – e.g., reduction of available habitat for a special-status species – should be considered cumulatively considerable without mitigation to minimize or avoid the impact.

The CEQA Guidelines direct the City, as the Lead Agency, to consider and describe in the EIR all feasible mitigation measures to avoid and/or mitigate potentially significant impacts of the Project on the environment based on comprehensive analysis of the direct, indirect, and cumulative impacts of the Project (CEQA Guidelines, §§ 15021, 15063, 15071, 15126.2, 15126.4 & 15370). This should include a discussion of impact avoidance and minimization measures for special-status species, which are recommended to be developed in early consultation with CDFW, USFWS, and the National Marine Fisheries Service. These measures can then be incorporated as enforceable Project conditions to reduce potential impacts to biological resources to less-than-significant levels.

Raffi Boloyan
City of Dixon
September 21, 2023
Page 6

ENVIRONMENTAL DATA

CEQA requires that information developed in EIRs and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special-status species and natural communities detected during Project surveys to CNDDDB. The CNDDDB online field survey form and other methods for submitting data can be found at the following link:

<https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link:


<https://wildlife.ca.gov/Data/CNDDDB/Plantsand-Animals>.

FILING FEES

CDFW anticipates that the proposed Project will have an impact on fish and/or wildlife, and assessment of filing fees is necessary to defray the costs of CDFW's review under CEQA (Fish & G. Code, § 711.4; Pub. Resources Code, § 21089). Fees are payable upon filing of the Notice of Determination by the Lead Agency.

If you have any questions, please contact Alexander Single, Environmental Scientist, at (707) 980-5154 or Alexander.Single@wildlife.ca.gov; or Melanie Day, Senior Environmental Scientist (Supervisory), at (707) 210-4415 or Melanie.Day@wildlife.ca.gov.

Sincerely,

DocuSigned by:

Erin Chappell
Regional Manager
Bay Delta Region

Attachment 1: Special-Status Species

ec: Office of Planning and Research, State Clearinghouse (SCH No. 2023080739)

Raffi Boloyan
 City of Dixon
 September 21, 2023
 Page 7

ATTACHMENT 1: Special-Status Species

Species Name	Common Name	Status
<i>Thamnophis gigas</i>	giant garter snake	FT, ST
<i>Buteo swainsoni</i>	Swainson's hawk	ST
<i>Agelaius tricolor</i>	tricolored blackbird	ST
<i>Bombus crotchii</i>	Crotch's bumble bee	CE
<i>Elanus leucurus</i>	white-tailed kite	FP
<i>Athene cunicularia</i>	burrowing owl	SSC
<i>Taxidea taxus</i>	American badger	SSC
<i>Ammodramus savannarum</i>	grasshopper sparrow	SSC
<i>Lanius ludovicianus</i>	loggerhead shrike	SSC
<i>Circus hudsonius</i>	northern harrier	SSC
<i>Antrozous pallidus</i>	pallid bat	SSC
<i>Astragalus tener var. ferrisiae</i>	Ferris' milk-vetch	CRPR 1B.1
<i>Astragalus tener var. tener</i>	alkali milk-vetch	CRPR 1B.2
<i>Puccinellia simplex</i>	California alkali grass	CRPR 1B.2
<i>Fritillaria pluriflora</i>	adobe-lily	CRPR 1B.2

FT = federally listed as threatened under the Endangered Species Act (ESA); ST = state listed as threatened under the California Endangered Species Act (CESA); CE = state candidate for listing as endangered under CESA; FP = state fully protected under Fish and Game Code; SSC = state Species of Special Concern; CRPR = California Rare Plant Rank

September 22, 2023

Raffi Boloyan, Community Development Director
City of Dixon Community Development Department
600 East A. St.
Dixon, CA 95620
rboloyan@cityofdixon.us

Re: The Campus/NOP comments

Dear Raffi:

Thank you for the opportunity to comment on the City of Dixon's (City) Intent to Prepare an Environmental Impact Report (EIR) for the "Campus project", formerly the "Dixon 257 Project". Please also refer to the comments provided by Dixon RCD in our June 2, 2023 Letter (enclosed).

We believe this project could have potentially significant impacts to hydrology and water quality, transportation and agricultural resources including, but not limited to:

- Alteration of the existing drainage patterns that could exacerbate flooding problems
- Contribution of runoff water, which would exceed the capacity of existing storm water drainage systems
- Exposure of life and property to increased flood hazards (including public roads)

Dixon Resource Conservation District (DRCD) and Reclamation District 2068 (RD2068) maintain drainage facilities downstream of the City's Northeast Quadrant (NEQ). Land in the NEQ, including this project, as well as the lands to the north and west of the NEQ that drain through the NEQ are not currently in the DRCD or RD2068 service areas, did not pay for facilities to be constructed, nor do they pay for ongoing maintenance or operations. More importantly, the downstream facilities (including DRCD, Reclamation District 2068) were not designed to accept runoff from the NEQ or the lands north and west of the NEQ. This is the basis of discharge limits established between DRCD and RD2068 as well as between the City, RD2068, DRCD and Maine Prairie Water District in the 2004 Dixon Regional Watershed Joint Powers Authority (JPA) Agreement (NEQ excerpts enclosed).

We request that potential impacts to all downstream facilities, including DRCD and RD2068, are fully evaluated and mitigated consistent with the terms in the JPA Agreement. The JPA Agreement terms center around the mutual understanding that, prior to development, most rainfall was impounded within the NEQ due to natural variability in topography. Our primary concerns and recommendations are as follows:

- If the Campus project proposes to provide 100% retention as an interim step will the flows that currently drain through the site also be retained? If not, how will the water that currently flows from land north and west of the NEQ and through the Campus project be managed?
- The hydrologic analysis for the Campus project needs to account for displaced existing conditions floodplain storage as well as mitigate for any concentration, acceleration and/or alteration to existing flow patterns that currently drain through the project site.
- If the project is proposing to move forward before the City’s Interim Drainage Plan for the NEQ (see below), there will need to be a separate analysis of impacts from any water discharged offsite. In order to evaluate impacts to downstream systems, all proposed discharge amounts, frequencies and durations should be quantified for 5, 10, 15 and 100-year storm events and impacts to downstream facilities and landowners modeled and mitigated accordingly.
- Plans should also be provided on how water would be managed and landowner agreements secured in the 2.5 miles of private ditches between the Campus project and the start of DRCD facilities.

With the recognition that the City and JPA member agencies have continued over the last 15+ years to actively pursue solutions to this drainage situation, DRCD and RD2068 have been willing to consider City proposals for interim projects, with the understanding that all potential impacts would be mitigated, the current flooding issues would be improved, and that all parties would be committed to the full regional solution in the long-term. West Yost Associates recently began work that will evaluate potential drainage solutions in the entire Tremont 3 Watershed. The scope and timeline of this work was agreed to and cost-shared by Solano County Water Agency, the City and JPA members in June and July 2023. Early tasks are focused on City’s Interim Drainage Plan for the NEQ, acknowledging that developers from the NEQ are ready to move forward on a faster timeline than the larger regional drainage solution.

West Yost Associates Schedule of Completion Dates

Tasks	Schedule Completion Date
Task 1. Document Base Case Conditions	September 8, 2023
Task 2. Evaluate the No City Conditions (NCC) and the Buildout Land Uses Condition (BLUC)	September 8, 2023
Task 3. Evaluate BLUC with the City NEQ Facilities	October 13, 2023
Task 4. Evaluate BLUC with the City NEQ	November 10, 2023
Task 5. Evaluate the Putah Creek Diversion Channel (PCDC) Regional Drainage Project (RDP)	February 23, 2024
Task 6. Evaluate the Upper Watershed Detention Basin(s) UWDB RDP	March 29, 2024
Task 7. Evaluate a Yet to be Determined RDP	May 24, 2024
Task 8. Presentations	June, 2024

The information from Tasks 1 through 4 are due to be considered by JPA members this winter. It is unclear how the Campus project will relate to this work. It appears that the Campus project is



proposing to move forward before there is agreement from the JPA member agencies on even the City's Interim Drainage Plan for the NEQ. If the project is proposing another phase of the City's Interim Drainage Plan for the NEQ, please ensure that each phase is evaluated separately and completely in the EIR. We would also appreciate if modeling of downstream impacts would be provided to Dixon RCD and RD 2068 with adequate time for us to review the potential impacts and consider whether the mitigations are sufficient.

Thank you for your time and consideration in the review of our questions and concerns. Over the last four years we have worked with more than four primary engineering contacts from the City regarding drainage from the NEQ. Currently, we are unclear on who our primary engineering contact at the City is. Please identify at least one City engineering representative that we should be communicating with on NEQ drainage. We look forward to continuing to work cooperatively toward solutions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kelly Huff".

Kelly Huff, District Manager
Dixon Resource Conservation District

Encl: DRCD Dixon 257 Comment Letter 060223
Pages 15-16 from 2004 JPA Agreement

Cc: City of Dixon Engineering Department
Jim Lindley, City Manager
Douglas White, White Brenner
Justin Noutary, Reclamation District 2068
Don Holdener and Meda Benefield, Maine Prairie Water District
Alex Rabidoux & Gustavo Cruz, Solano County Water Agency
Doug Moore, West Yost Associates
Greg Bardini, Morton and Pitalo, Inc.
Rich Seithel, Solano County LAFCO

June 2, 2023

Brian Millar, Project Planner
City of Dixon
171 S 5th St
Dixon, CA 95620

Re: Dixon 257 Project Application Referral dated May 17, 2023 – Drainage Study

Dear Brian:

Thank you for sending the Referral seeking initial input regarding the proposed Dixon 257 development project in the City of Dixon's Northeast Quadrant (NEQ). Due to the short turn around for the initial comments, neither the Dixon RCD Board of Directors nor the Dixon Regional Watershed Joint Powers Authority Board have been able to formally consider this information. You may receive additional comments after those agencies hold their June Board Meetings.

As you and the project proponent are hopefully aware, Dixon RCD owns and operates the drainage facilities (Dixon RCD Tremont 3 Ditch) that are downstream of the project which in turn drain to Reclamation District 2068's facilities. The lands north and west of the railroad tracks (including the NEQ) are not within the Tremont 3 service area, but they impact it. The JPA Agreement signed in 2004 by Dixon RCD, City of Dixon, Maine Prairie Water District and Reclamation District 2068 contains the conditions agreed to by these parties in order for Dixon RCD and Reclamation District 2068 to accept drainage from the NEQ, including drainage originating outside of the NEQ. In order for Dixon RCD, as well as the other JPA member agencies, to consider this project and its impacts, it is critical to understand the changes in flow being proposed at Highway 80 and at the railroad tracks and how those compare to the JPA Agreement. Below is a list of initial questions and concerns regarding the Drainage Study and the proposed changes to the NEQ Specific Plan included in the application.

Drainage Study

1. Our understanding is that the City's conceptual plans will be proposed as an interim project that would later tie into potential options for a future regional drainage project. The preferred future regional project has not yet been selected or committed to by JPA member agencies, Solano County, Solano County Water Agency, landowners and developers within the City's Northeast Quadrant and the County's Ag Industrial Support Area (AISA). In the absence a regional project, the City's final designs for an interim project must be formally agreed to by all JPA member agencies. The

information provided in the Dixon 257 Drainage Study is insufficient to determine the project's potential impacts on Dixon RCD and RD 2068.

2. New culverts under Highway 80: It is unclear whether new culverts under Highway 80 are being proposed by the Dixon 257 Project or the Milk Farm Project? Dixon RCD is very concerned with any proposed increases in flows or capacity across Highway 80 without information on how that increase in flow will be mitigated prior to leaving the NEQ. In addition, the City and NEQ / Milk Farm Developers must ensure that any new drainage infrastructure will not facilitate more impacts to downstream facilities from potential future landuse changes in the 2700+ acre upper watershed. The City's interim plan should include information on how the project will avoid the potential for future impacts from increased capacity under Highway 80 if further build out in the upper watershed occurs.

3. Lands between NEQ and Dixon RCD Facilities: There are 4-5 landowners (including Campbell's Soup Supply Company and Union Pacific Railroad) between the NEQ and the start of Dixon RCD's Tremont 3 Facility. It is unclear how impacts to these lands and connection to the Tremont 3 Facility will be addressed.

4. Operation and Maintenance Costs: Depending on which regional drainage option is ultimately chosen, it must account for payment of ongoing maintenance and operation of either the Dixon RCD and RD2068 facilities and/or future regional drainage facilities.

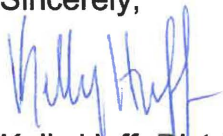
Proposed Changes to NEQ Specific Plan

Dixon RCD has the following questions/recommendations regarding proposed changes to the NEQ Specific Plan.

- On Page 2-1, why is the City proposing to strike the following language? *"Integrate proposed drainage areas, landscape frontage treatments and agricultural buffers as parts of a plan-wide open space system."*
- The language in Section 6-3 Drainage will need updating to reflect the current plans for drainage projects instead of the "Eastside Drain Plan".

We look forward to working through these questions and issues with you.

Sincerely,



Kelly Huff, District Manger
Dixon Resource Conservation District

Cc: Deborah Barr, City of Dixon Engineer
Justin Noutary, Reclamation District 2068
Don Holdener and Meda Benefield, Maine Prairie Water District

currently 77.5 cfs. Nothing in this Agreement modifies the rights of lands formerly owned by Sork *et al.* to drain into the DRCD drainage system, which lands are more particularly shown by the map attached as Exhibit J.

- (k) With regard to drainage from the Northeast Quadrant of the City, the Parties agree that the City is entitled to drain into the DRCD drainage system the present natural runoff from the Northeast Quadrant, without concentration or acceleration, recognizing that, prior to development, most rainfall was impounded within the Northeast Quadrant due to natural variability in topography. The Parties agree that, pursuant to this Agreement and for the purpose of settling potential disputes, the baseline present storm flows from the Northeast Quadrant shall be set at 23.1 cfs for a 5-year storm, 27.2 cfs for a 10-year storm, and 37.2 cfs for a 100-year storm measured at the 30-inch CMP in the railroad embankment as set forth in a letter from West Yost & Associates to the City dated June 16, 2004 and attached hereto as Exhibit K.
- (i) All storm flows shall be released from the Northeast Quadrant at the greatest rate consistent with the terms of paragraph 10(f)(3)(a).
 - (ii) The City will address, in a manner fully consistent with applicable law, any storm flows in excess of the baseline flows as part of its review of development projects in the Northeast Quadrant and will cause there to be sufficient mitigation for the effects, if any, of such excess storm flows.
 - (iii) The City shall address, in a manner fully consistent with applicable law, the question of whether development in the Northeast Quadrant may be required to pay for downstream improvements needed to convey the baseline storm flows from the Northeast Quadrant to Haas Slough without damage.
- (l) With regard to drainage originating outside the Northeast Quadrant of the City but draining into the Northeast Quadrant, the Parties acknowledge that they must accept the natural runoff from such lands, without concentration or acceleration. The Parties further acknowledge that such drainage has been concentrated and accelerated by virtue of the construction of Interstate 80 and other improvements.

The Parties agree that, pursuant to this Agreement, the City may release flows originating outside the Northeast Quadrant of the City but draining into the Northeast Quadrant at the greatest rate consistent with the terms of paragraph 10(f)(3)(a). Such flows shall be included within the drainage rate established by paragraph 10(f)(3)(k).

- (4) *Operation of Facilities.* The Authority shall prepare an "Operation and Maintenance Manual" for every Phase or project constructed which shall include agreed upon standards of maintenance for each project. The Board shall approve a final operation and maintenance manual for Phase I not later than the date of the Notice of Completion for Phase I or one year from the date of this Agreement, whichever date is later. With respect to all other phases or projects within a phase, the Board shall approve a final operation and maintenance manual not later than the date on which the Authority, or any Party authorized to construct a project on behalf of the Authority, approves a call for bids to construct a project.

The Authority may operate its facilities by means of its own employees or contractors or a combination thereof. The Authority may also contract with one or more Parties for the operation and maintenance of facilities owned by the Authority. Immediately upon execution of this Agreement, the Authority may enter into a separate Operation and Maintenance Agreement with each of DRCD, MPWD and RD 2068, as applicable, in substantially the form attached as Exhibit "L".

- (5) *Conveyance of Recorded Real Property Interests.* Within sixty (60) days of the date on which the Board decides to construct any project identified in this Agreement, each Party shall convey to the Authority, by means of appropriate instrument(s), all of its existing rights, title, and interest in real estate and existing facilities needed for the construction or operation of the approved project. Title to the real property rights associated with Lateral 1 shall be conveyed to the Authority within sixty (60) days of the formation of the Authority. Each Party may reserve an easement over such real estate sufficient to permit it to operate and maintain its then pre-existing facilities to design standards in the event that the Authority fails to operate and maintain those facilities to that Party's design standards.
- (6) *Conveyance of Prescriptive Rights.* The Parties recognize that prescriptive easements underlie many of the existing facilities owned by them that provide drainage to one or more of the Parties. Each Party shall make good faith efforts to obtain recorded



September 26, 2023

Raffi Boloyan
City of Dixon
600 East A Street
Dixon, CA 95620

Re: The Campus/Dixon 257

Dear Raffi Boyolan,

Thank you for providing PG&E the opportunity to review the proposed plans for The Campus project dated 8/30/2023. Our review indicates the proposed improvements do not appear to directly interfere with existing PG&E facilities or impact our easement rights.

Please note this is our preliminary review and PG&E reserves the right for additional future review as needed. This letter shall not in any way alter, modify, or terminate any provision of any existing easement rights. If there are subsequent modifications made to the design, we ask that you resubmit the plans to the email address listed below.

If the project requires PG&E gas or electrical service in the future, please continue to work with PG&E's Service Planning department: <https://www.pge.com/cco/>.

As a reminder, before any digging or excavation occurs, please contact Underground Service Alert (USA) by dialing 811 a minimum of 2 working days prior to commencing any work. This free and independent service will ensure that all existing underground utilities are identified and marked on-site.

If you have any questions regarding our response, please contact the PG&E Plan Review Team at pgeplanreview@pge.com.

Sincerely,

PG&E Plan Review Team
Land Management

California Department of Transportation

DISTRICT 4
OFFICE OF REGIONAL AND COMMUNITY PLANNING
P.O. BOX 23660, MS-10D | OAKLAND, CA 94623-0660
www.dot.ca.gov



September 28, 2023

SCH #:2023080739
GTS #:04-SOL-2023-00291
GTS ID:30698
Co/Rt/Pm: SOL/80/39.751

Raffi Boloyan, Community Development Manager
City of Dixon
600 East A St.
Dixon, CA, 95620

Re: The Campus – Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR)

Dear Raffi Boloyan:

Thank you for including the California Department of Transportation (Caltrans) in the NOP environmental review process for The Campus project. We are committed to ensuring that impacts to the State's multimodal transportation system and to our natural environment are identified and mitigated to support a safe, sustainable, integrated and efficient transportation system.

The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities. The following comments are based on our review of the August 2023 NOP.

Project Understanding

The proposed project would consist of a phased, mixed-use development that includes a 48-acre Dixon Opportunity Center (DOC), approximately 1,041 residential units, and approximately 2.5 acres of commercial uses. This 260-acre project site is located directly adjacent to State Route (SR)-80.

Travel Demand Analysis

With the enactment of Senate Bill (SB) 743, Caltrans is focused on maximizing efficient development patterns, innovative travel demand reduction strategies, and multimodal improvements. For more information on how Caltrans assesses Transportation Impact Studies, please review Caltrans' Transportation Impact Study Guide ([link](#)).

If the project meets the screening criteria established in the City's adopted Vehicle Miles Traveled (VMT) policy to be presumed to have a less-than-significant VMT impact and exempt from detailed VMT analysis, please provide justification to support the exempt status in alignment with the City's VMT policy. Projects that do not meet the screening criteria should include a detailed VMT analysis in the DEIR, which should include the following:

- VMT analysis pursuant to the City's guidelines. Projects that result in automobile VMT per capita above the threshold of significance for existing (i.e. baseline) city-wide or regional values for similar land use types may indicate a significant impact. If necessary, mitigation for increasing VMT should be identified. Mitigation should support the use of transit and active transportation modes. Potential mitigation measures that include the requirements of other agencies such as Caltrans are fully enforceable through permit conditions, agreements, or other legally-binding instruments under the control of the City.
- A schematic illustration of walking, biking and auto conditions at the project site and study area roadways. Potential traffic safety issues to the State Transportation Network (STN) may be assessed by Caltrans via the Interim Safety Guidance ([link](#)).
- The project's primary and secondary effects on pedestrians, bicycles, travelers with disabilities and transit performance should be evaluated, including countermeasures and trade-offs resulting from mitigating VMT increases. Access to pedestrians, bicycle, and transit facilities must be maintained.

Hydrology

Stormwater runoff from I-80 corridor drains southeast through an existing drainage system of cross-culverts and ditches as an upstream flow for the project. This project is altering the existing drainage with new storm drains and basin structures. Please submit drainage plans and reports to the Office of Hydraulics to review and evaluate if there are any adverse impacts to the I-80 drainage system.

Construction-Related Impacts

Potential impacts to the State Right-of-Way (ROW) from project-related temporary access points should be analyzed. Mitigation for significant impacts due to construction and noise should be identified. Project work that requires movement of oversized or excessive load vehicles on State roadways requires a transportation permit that is issued by Caltrans. To apply, please visit Caltrans Transportation Permits ([link](#)).

Prior to construction, coordination may be required with Caltrans to develop a Transportation Management Plan (TMP) to reduce construction traffic impacts to the State Transportation Network (STN).

Lead Agency

As the Lead Agency, the City of Dixon is responsible for all project mitigation, including any needed improvements to the STN. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

Equitable Access

If any Caltrans facilities are impacted by the project, those facilities must meet American Disabilities Act (ADA) Standards after project completion. As well, the project must maintain bicycle and pedestrian access during construction. These access considerations support Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users.

Encroachment Permit

Please be advised that any permanent work or temporary traffic control that encroaches onto Caltrans' ROW requires a Caltrans-issued encroachment permit. As part of the encroachment permit submittal process, you may be asked by the Office of Encroachment Permits to submit a completed encroachment permit application package, digital set of plans clearly delineating Caltrans' ROW, digital copy of signed, dated and stamped (include stamp expiration date) traffic control plans, this comment letter, your response to the comment letter, and where applicable, the following items: new or amended Maintenance Agreement (MA), approved Design Standard Decision Document (DSDD), approved encroachment exception request, and/or airspace lease agreement. Your application package may be emailed to D4Permits@dot.ca.gov.

To obtain information about the most current encroachment permit process and to download the permit application, please visit Caltrans Encroachment Permits ([link](#)).

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact John McKenzie, Associate Transportation Planner via LDR-D4@dot.ca.gov. For future early coordination opportunities or project referrals, please contact LDR-D4@dot.ca.gov.

Raffi Boloyan, Community Development Director
September 28, 2023
Page 4

Sincerely,

A handwritten signature in black ink, appearing to read "Luo Yunsheng". The signature is fluid and cursive, with the first name "Luo" written in a larger, more prominent style than the last name "Yunsheng".

YUNSHENG LUO
Branch Chief, Local Development Review
Office of Regional and Community Planning

c: State Clearinghouse

Central Valley Regional Water Quality Control Board

29 September 2023

Raffi Boloyan
City of Dixon
600 East A Street
Dixon, CA 95620
rboloyan@cityofdixon.us

COMMENTS TO REQUEST FOR REVIEW FOR THE NOTICE OF PREPARATION FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT, THE CAMPUS PROJECT, SCH#2023080739, SOLANO COUNTY

Pursuant to the State Clearinghouse's 30 August 2023 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Notice of Preparation for the Draft Environmental Impact Report* for The Campus Project, located in Solano County.

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

I. Regulatory Setting

Basin Plan

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

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

Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues. For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:

http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/

Antidegradation Considerations

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Implementation Policy is available on page 74 at:

https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_2018_05.pdf

In part it states:

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

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

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

II. Permitting Requirements

Construction Storm Water General Permit

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit), Construction General Permit Order No. 2009-0009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). For more information on the Construction General Permit, visit the State Water Resources Control Board website at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml

Phase I and II Municipal Separate Storm Sewer System (MS4) Permits¹

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

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

http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/

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

http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml

Clean Water Act Section 404 Permit

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACE). If a Section 404 permit is required by the USACE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements. If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACE at (916) 557-5250.

Clean Water Act Section 401 Permit – Water Quality Certification

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

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

https://www.waterboards.ca.gov/centralvalley/water_issues/water_quality_certification/

Waste Discharge Requirements – Discharges to Waters of the State

If USACE determines that only non-jurisdictional waters of the State (i.e., “non-federal” waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation. For more information on the Waste Discharges to Surface Water NPDES Program and WDR processes, visit the Central Valley Water Board website at: [https://www.waterboards.ca.gov/centralvalley/water_issues/waste to surface water/](https://www.waterboards.ca.gov/centralvalley/water_issues/waste_to_surface_water/)

Projects involving excavation or fill activities impacting less than 0.2 acre or 400 linear feet of non-jurisdictional waters of the state and projects involving dredging activities impacting less than 50 cubic yards of non-jurisdictional waters of the state may be eligible for coverage under the State Water Resources Control Board Water Quality Order No. 2004-0004-DWQ (General Order 2004-0004). For more information on the General Order 2004-0004, visit the State Water Resources Control Board website at:

https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf

Dewatering Permit

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Threat General Order) 2003-0003 or the Central Valley Water Board’s Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Threat Waiver) R5-2018-0085. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

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

http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf

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

https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2018-0085.pdf

Limited Threat General NPDES Permit

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will

require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Limited Threat Discharges to Surface Water* (Limited Threat General Order). A complete Notice of Intent must be submitted to the Central Valley Water Board to obtain coverage under the Limited Threat General Order. For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:

https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01.pdf

NPDES Permit

If the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit. For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at: <https://www.waterboards.ca.gov/centralvalley/help/permit/>

If you have questions regarding these comments, please contact me at (916) 464-4684 or Peter.Minkel2@waterboards.ca.gov.

Peter Minkel

Peter Minkel
Engineering Geologist

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

TERRY SCHMIDTBAUER
Director
tschmidtbauer@solanocounty.com

JAMES BEZEK
Assistant Director
jmbezek@solanocounty.com

DEPARTMENT OF RESOURCE MANAGEMENT



**SOLANO
COUNTY**

675 Texas Street, Suite 5500
Fairfield, CA 94533-6342
(707) 784-6765
Fax (707) 784-4805

www.solanocounty.com

October 1, 2023

Mr. Raffi Boloyan
Community Development Director
City of Dixon Community Development Department
600 East A. Street
Dixon, CA 95620

rboloyan@cityofdixon.us

RE: Notice of Availability and Intent to Prepare an Environmental Impact Report for the Campus Project

Dear Mr. Boloyan:

We appreciate the opportunity to provide the following comments on the Notice of Preparation (NOP) for the Environmental Impact Report for The Campus Project (Project). Based on the NOP, the Campus Project site comprises approximately 260 acres, or 40%, of the City's Northeast Quadrant Specific Plan area and is proposed to include the following:

- A mixed-use development, including a 48-acre Dixon Opportunity Center (DOC) comprised of Light industrial uses, a Tech-Campus, and a business park; and
- Approximately 144 acres of residential uses to include 1,041 units of varying densities; and
- Approximately 2.5 acres of commercial uses.

The Project is located entirely within the City of Dixon and its Municipal Service Area (MSA) boundaries, immediately west of the unincorporated area designated as Limited Industrial by the 2008 Solano County General Plan (GP Figure LU-7). Uses within the Dixon Limited Industrial area are intended to be agriculturally related and permitted uses include agricultural services such as the storage or sales of product for commercial agriculture, agricultural processing, and corporation yards for the storage and maintenance of agricultural equipment. County Zoning identifies this area as Industrial-Agricultural Service "I-AS".

Solano County previously provided comments on the Dixon 257 project application proposed in the Northeast Quadrant Specific Plan area in a letter dated June 2, 2023, which is attached. Many of the comments in the June 2nd letter pertain to this Project in terms of the plan for the area. Specifically, the County is concerned with the proposed location of commercial, office/business space and residential development, including high-density residential units, in proximity to existing agricultural and associated agricultural supported businesses along Pedrick Road and in the adjacent Industrial-Agricultural Services Area. This includes placing residences across from the Campbell's Soup Supply Company facility (Campbell's), an agricultural processing facility. The County recommends reconfiguration of the Project's land plan and consideration of a more substantive spatial buffer within City limits to mitigate potential conflict between the Project and the County's Industrial-Agricultural Service Area and other nearby agricultural businesses and uses. Other concerns regarding noise, traffic, water, sewer, and drainage remain relevant in the preparation of CEQA document. These

SAEED IRAVANI
Building Official
Building & Safety

ALLAN CALDER
Program Manager
Planning Services

EDMOND STRICKLAND
Manager
Environmental Health

SARAH PAPPAKOSTAS
Administrative
Services
Manager

MATT TUGGLE
Engineering Manager
Public Works
Engineering

CHARLES BOWERS
Operations Manager
Public Works
Operations

CHRIS DRAKE
Parks Services
Manager
Parks

MISTY KALTREIDER
Water & Natural
Resources Program
Manager

fundamental suggestions and others are highlighted below and emphasize the need for specific environmental resources to be analyzed in the DEIR for potentially significant impacts associated with the implementation of the Project.

Impacts to Agricultural Operations and Economy

As identified in the June 2, 2023 letter, prime Agricultural areas and critical agricultural supported businesses, including agricultural processors and trucking facilities, are located adjacent to the proposed Project site. This includes the Industrial-Agricultural Service (I-AS) zoning area located east and north of the Project. Campbell's, located on Pedrick Road, employs 200 people during tomato season and processes approximately 450,000 tons of tomatoes / year as it supports our local and regional tomato farmers. The tomato crop is typically one of the highest economic drivers in agricultural processing in the County, yielding approximately \$46 million dollars in 2022. Its continuing operation in the County is of the highest priority. Any project that would cause Campbell's and other ag-supported industries to relocate is of serious concern to the County.

Residential development is proposed to be located directly along Pedrick Road across from the Campbell's and other critical ag-supported industry facilities. The proposed proximity of residences to an existing agricultural processing facility and support businesses creates a potential conflict. The Illustrative Land Use Plan (Figure 6) provided in the NOP does not provide an adequate ag-urban buffer, aside from landscaping, between the various uses contemplated in the Project and the agricultural production and agriculturally supporting land uses adjacent to the Project along Pedrick Road. The increased congestion from the Project at the intersections along Pedrick Road will substantially impact Campbell's and the other ag-supported industry utilizing Pedrick Road accesses.

Incorporating a buffer along the Project's Pedrick Road frontage to mitigate potential noise, traffic, and aesthetic impacts between the existing and proposed opposing land uses should be considered. Clearly define the ag-urban buffer components which may include the width, proposed uses or landscaping. The Draft EIR should also evaluate alternative configurations on the geographic locations of the residential and commercial units within the Project site, ingress and egress points, and buffer space between the residence units and the surrounding agricultural-industrial facilities to mitigate potential conflicts in traffic congestion, noise / nuisance, and other environmental issues at this ag-industrial / Project interface.

Regional Traffic Impacts

As identified in the June 2, 2023 letter, high density residential usage proposed in the Project will create significant traffic and congestion impacts to the county roads and connectors. The Project needs to thoroughly examine and mitigate the potential local and regional traffic and road impacts. Please refer to the June 2, 2023 letter for specific concerns.

Redesign of ingress and egress points to minimize impact on existing agricultural support facilities and processing plants should be considered and evaluated. The DEIR should analyze impacts associated with the Pedrick Road / I-80 intersection and the potential traffic conflicts of the proposed urban development and the commercial agricultural and industrial operations on Pedrick Road and other County roads (refer to the June 2, 2023 letter).

Water Facilities & Groundwater Quality & Quantity

The Project is proposing to serve domestic water through a new water infrastructure and municipal well. The new well is proposed on the north side of the Project site, adjacent to Professional Drive. As identified in our letter dated June 2, 2023, the former Dixon Consultation Zone/Dixon Business Park is a contaminated site within the Project area due to its groundwater nitrate plume. Operations from a new municipal well may cause the residual contaminant plume from this and other known or unknown sites in the region to spread and create impacts to the new well or surrounding wells. Additionally, the NOP does not discuss the potential for off-site impacts.

To continue to protect the health and safety of the Project residents, a groundwater quality monitoring network should be proposed in coordination with the Solano Subbasin Groundwater Sustainability Agency (GSA) to track any movement and migration of contaminant plumes that may have accelerated due to the pumping of the proposed nearby well. The City of Dixon (City) should coordinate with the Regional Water Quality Control Board and County regarding the well permitting process and requirements for the siting and construction of the new well.

The City is a member of the Solano Subbasin Groundwater Sustainability Agency (Solano GSA). Any changes in the City's groundwater supply and quality will need to be documented in the Groundwater Sustainability Plan (GSP) including annual groundwater reporting to monitor any unintended consequences. The proposed well is located east of the Northwest Focus Area, which is identified in the GSP as an area of declining groundwater levels over the last twenty years. Due to the high capacity of the proposed well (1,500 gallons per minute) and its vicinity to this area of declining water table, it is prudent to understand the well's hydro-geological impacts on surrounding wells and the sustainability of the aquifer. The City will need to keep the Solano GSA informed and updated for any future changes in its water supply and quality and coordinate with the Solano GSA in any future groundwater development.

A water well drilling permit will also need to be obtained from Solano County Environmental Health to drill the proposed water well supplying the development. Approval for the well location from the Division of Drinking Water (DDW) may also be required to approve and issue a water well drilling permit at this location, and will be required to operate a public water system

An analysis of impacts on Hydrology and Water Quality, specifically on the Project's impact on groundwater supplies and drainage within the area, including the impact potential on the Dixon Limited Agricultural Service area adjacent to the Project site should be provided. This would include evaluation of impacts to groundwater supplies and the GSP, along with any impact related to movement of contaminants.

Closed Landfill

The Dixon Downs/Mistler Farm closed landfill is within the Project site and adjacent to proposed residential units. The Solano County Local Enforcement Agency's (LEA) concerns were included in the June 2, 2023 letter. The LEA continues to have concerns about how the area of the closed landfill will be handled during development of the Project. The closed landfill did undergo excavation, though

post excavation soil gas analytical data shows various chemical constituents (including the Volatile Organic Compounds of concern) remain from 4 ft to 14 ft below ground. The LEA understands that the restricted area will be developed into roadways, a sidewalk with tree and shrub landscape and will be dedicated to the City with no intention of splitting the restricted area into several parcels. Public use is not intended for the restricted area and no buildings will be built within the restricted area.

Development for the Project will include earthwork and trenching throughout the restricted area to a depth of at least 7 feet. This requires that the hazardous soil be handled properly to protect workers from exposure and the environment during development. Maintenance of the restricted area after development is completed is also a concern. If further trenching or excavation work is needed, worker and public safety needs to be addressed. Additionally, mitigation to address the long-term safety of the public and residents in nearby dwellings (such as those directly across the street from the restricted area) is necessary. The DEIR will need to address these issues and how the Project meets the post closure land use regulations to ensure that the public will not be exposed to hazards.

Drainage/Stormwater Control Basin location & Consider Groundwater Recharge

The County recommends coordinating with the Solano GSA agencies and other local agencies to identify prime location(s) for drainage and other facilities to augment stormwater capture and groundwater recharge to enhance additional groundwater supply. The County is concerned that utilizing the existing culvert at Pedrick Road may not be of sufficient size and capacity for additional flows and may cause downstream impacts and increased flooding potential outside the NEQSP area. We therefore request the City consider other means to reduce drainage off site from the Project as much as possible through the use of recharge and infiltration areas. Any additional flows from the Project must not add to the downstream flows without adequate mitigation including accounting for effects of climate changes.

The planning of drainage, water supply, and sewer system within the Project should also consider multi-use approaches to address beneficial regional solutions. Water flows across jurisdictional boundaries as noted in the proposed Project description where drainage water temporarily stored in the detention basin will eventually be discharged into the Tremont 3 drainage system, which is in the unincorporated area. We encourage the City and GSA, and surrounding drainage agencies including Solano County Water Agency, Dixon Resource Conservation District, and others to coordinate and collaborate in their efforts of finding integrated solutions to drainage, sewer, and water supply challenges by maximizing benefits in this Project development such as developing nature-based drainage and basin designs to maximize groundwater recharge or other potential reuse, a much-needed resource for the local area.

Integrated "One Water" Multi-benefit Opportunities and Alternatives

The Project proposes sewer, water, and drainage improvements in areas immediately adjacent to the County's existing I-AS area that contains existing agricultural support facilities, including Campbell's. These existing ag-service industries utilize individual wastewater collection and disposal systems, water supply wells, and on-site drainage facilities. The County Board of Supervisors held a priority setting session on April 18, 2023 that identified the need for a countywide One Water master utility study to help support economic development and agricultural development and preservation. Provision of community sewer, water, and drainage services could be beneficial for existing

businesses and allow further development of agricultural support industry in this zoning district. Opportunity exists for the City and County to evaluate potential partnerships that may be beneficial to both entities to determine and provide the infrastructure needs more efficiently throughout the area to further promote economic development and agricultural preservation/development with a One Water mindset. It is recommended that various alternatives should be explored and considered in the DEIR in relation to water and wastewater infrastructure planning and design with a regional and integrated One Water approach.

Aesthetics

It is unclear from the materials supplied in the NOP on the design and architecture of the proposed Project, in particular the commercial and industrial land uses within the Dixon Opportunity Center. Architectural drawings and photo simulations of the Project are necessary to assess potential Aesthetic impacts in the DEIR.

Airport Land Use Commission Review required

The property is located outside of the Bird Strike Zone but within Compatibility Zone E, which does not restrict land uses or hazards to flight; however, ALUC review is required for consistency with the Travis AFB LUCP due to the legislative actions required.

We appreciate the opportunity to provide comments on the proposed Project. Please do not hesitate to contact me (TSchmidtbauer@solanocounty.com) if you have any questions or require additional information.

Sincerely,



Terry Schmidtbauer,
Solano County Director of Resource Management

Cc: Bill Emlen, CAO

Attachment: June 2, 2023 Solano County Department of Resource Management comment letter
(incorporated by reference)

TERRY SCHMIDTBAUER
Director
tschmidtbauer@solanocounty.com

JAMES BEZEK
Assistant Director
jmbezek@solanocounty.com

DEPARTMENT OF RESOURCE MANAGEMENT



**SOLANO
COUNTY**

675 Texas Street, Suite 5500
Fairfield, CA 94533-6342
(707) 784-6765
Fax (707) 784-4805
www.solanocounty.com

June 2, 2023

Brian Millar
bmillar@cityofdixon.us
530.902.9218

RE: Project Application Referral for a 257-acre parcel in the Northeast Quadrant Specific Plan Area, referred to as Dixon 257 (City Planning Application (PA23-16) - Rezoning (RZ23-01), Specific Plan Amendment (SP23-01), Tentative Map (TM23-01).

Mr. Millar,

Thank you for the opportunity to provide early comments pertaining to the Dixon 257 project application and for providing access to the documents "*Agency Referral Dixon 257 Formal Application*" and "*23.0314 The Campus NEQSP Amendment – Project Description*" for county staff review. This project involves amendment to the City's Northeast Quadrant Specific Plan and Municipal Code to support a proposed mixed-use development of approximately 257 acres that will include:

- 47-acre technical campus with approximately 660,000 sq. ft. of building space
- Within the technical campus would be 2 acres of commercial uses
- 10 acres of high-density residential housing, with up to 250 residential units
- 142 acres of low-density residential housing, with 800-850 residential units
- Parks and paseos
- Storm drainage detention basin
- Well/tank site
- Related improvements and infrastructure.

The site is bounded by Pedrick Road to the east; commercial and industrial uses and Vaughn Road to the south, commercial and industrial uses and Interstate 80 to the west; and agricultural and industrial uses to the north. The project is expected to be developed pursuant to a phasing plan, with project build-out occurring over many years.

The proposed plan for the 257 project features an ambitious mixed-use layout that is housing centric. Based on the current housing shortage that exists region wide, the plan has potential to meet identified needs. The mix of housing units seems tilted towards low density residential dwellings, which may not fully meet regional needs for workforce type housing. As the plan evolves, hopefully there will be consideration for a range of housing types accessible to all income levels. In terms of the overall plan, the County has some specific issues with the juxtaposition of certain residential uses and adjacent agricultural uses and activities, and requests possible reconfiguration of the land plan and consideration of more substantive buffers, especially to the existing and potential agricultural support industries located in the adjacent Industrial-Agricultural Services Area. These fundamental suggestions and other more detailed recommendations are highlighted as follows.

SAEED IRAVANI
Building Official
Building & Safety

ALLAN CALDER
Program Manager
Planning Services

EDMOND STRICKLAND
Manager
Environmental Health

SARAH PAPPAKOSTAS
Administrative
Services
Manager

MATT TUGGLE
Engineering Manager
Public Works
Engineering

CHARLES BOWERS
Operations Manager
Public Works
Operations

CHRIS DRAKE
Parks Services
Manager
Parks

MISTY KALTREIDER
Water & Natural
Resources Program
Manager

The Project's Current Development Plan May Impact the Sustainability of the Region's Agricultural Operations and Economy

Campbell's Soup Supply Company (Campbell's), located on Pedrick Road, employs 200 people during tomato season and processes approximately 450,000 tons of tomatoes / year as it supports our local and regional tomato farmers. The 2022 tomato crop yielded approximately \$46 million dollars and is projected to be well over \$60 million for the 2023 season. It is of the highest priority to retain Campbell's at their current location. Any project that would cause Campbell's to relocate is of serious concern to the County. Campbell's would likely cause an unpredictable landscape shift in local agriculture, forcing growers to move to less valuable crops and would have a substantial impact on local jobs, trucking companies, fuel suppliers, other ag support services and more, due to the loss of a regional tomato processing facility that supports their farming operations. Hence, this vital agricultural support facility must be supported and protected from impact.

In the project's current configuration, the Preliminary Land Plan creates the potential for negative impacts to Campbell's. Conflict is especially likely during the mid-July to Mid-October harvest season when Campbell's operates 24 hours a day and receives an average of 240-250 trucks per day. As portrayed in the information reviewed by the Department, the project places housing directly across from the Campbell's and includes several intersections along Pedrick Road, one of which is directly across from their facility. This intersection, and Pedrick Road in general, could be expected then to have a substantial increase in residential and commercial traffic associated with construction and from the on-going occupancy of the project's residential and commercial/technical development. The increase traffic at these intersections, and along Pedrick Road, is anticipated to have a significant impact on Campbell's, and agricultural trucking in general, that utilizes Pedrick Road.

Recommendations:

- With a site plan alteration and relocation of the proposed "Tech Park" adjacent to Campbell's and relocation of residential units away from Campbell's may provide improved buffering between the proposed residences and the existing agricultural-industrial operations.
- If the site plan is not altered as suggested above, significant agricultural/landscape buffers (landscape berms and mixed height plantings) should be incorporated along the west side of Pedrick Road to reduce noise issues the residents may perceive from Campbell's and other industrial uses and potential residents should be notified of county right-to-farm policies. Additionally, the 225 proposed high-density units could be relocated to the west, closer to Professional Drive to further mitigate the potential for noise disturbances from agricultural operations at Campbell's.
- Project should be designed such that its roads and intersections would not significantly impact existing agricultural support facilities and trucking routes associated with Campbell's.

Creation of Nuisances

The Preliminary Land Plan creates residential neighborhoods that are in proximity to the County's Industrial-Agricultural Service Area that supports around the clock agricultural operations, including processing operations during harvest season. This design ignores current activity and creates a condition where the City is placing its future residents and existing agricultural support operations in direct conflict with each other. It is highly anticipated that conflicts related to noise, light, odors, and traffic will occur from implementation of this design.

Recommendations:

The project should be redesigned to minimize creation of nuisance from Urban-Agriculture interface, including Industrial-Agricultural operations that support the County's agricultural activity.

Regional traffic impacts

The higher density housing in the Mixed-Use zoning area will create significant traffic impacts to the County's unincorporated roads from local traffic. This includes increased traffic on:

- a. Pedrick Road, from the railroad tracks south to Midway Road
- b. Vaughn Road, from Pedrick Road to Dixon city limit
- c. Dixon Avenue East, from Pedrick Road to Dixon city limit

The project will also create significant impacts to the County's unincorporated roads from regional traffic (from Dixon to outside Dixon). The traffic congestion hours on Interstate 80 create off-route trip impacts along the County's unincorporated roads which provide travel time relief. The regional service trip generation from residents of the new development will generate increased traffic on:

- a. Currey Road
- b. Mace Boulevard
- c. Midway Road
- d. Pedrick Road
- e. Pitt School Road
- f. Robben Road
- g. Sievers Road
- h. Sparling Lane
- i. Tremont Road
- j. Vaughn Road

The development needs to specify adequate mitigation for the vehicle miles traveled from trips generated to reach the services needed to support the residential development. This could include improved bicycle and sidewalk connectors, improved transit, realignment of roads, and/or more commercial opportunities within the development to reduce the number and length of vehicle trips from the project. Also, the project needs to account for impacts to Pedrick Road and other unincorporated County roads when I-80 is impacted.

Concerns Regarding the Project's Protection of Public Health and Safety and Comments on Infrastructure (Water, Sewer, Drainage)

Development is proposed in Close Proximity to a Closed Landfill:

On page 34 of the document "347-001 Pedrick Road Property Phase 1 ESA" the former Mistler Farm Facility identifies an abandoned landfill area. A portion of the parcel was used as a landfill and is under regulation by the Solano County Local Enforcement Agency (LEA). The LEA has worked with the City and its consultants over the last several years, including reviewing the waste removal that recently occurred. At no time did the City share with the LEA its immediate plans to rezone and develop the area surrounding the parcel. As the City's documents indicate, a deed restriction is located along a portion of the western boundary of parcels 0111-040-010 and 0111-040-040. The deed restriction defines the

former closed landfill mitigation area and prohibits not only any residential structure but also any building whatsoever to be built there. Post waste extraction gas testing revealed that the mitigation area contains Volatile Organic Chemicals, in the form of soil gas, which are a known hazard to the public health and safety. A cursory review of the Preliminary Land Plan shows that at least two, maybe three lots are placed over this prior landfill area.

The LEA has concerns with how this restricted area will be handled during the development of the project, especially during earthwork of the project area and then once the project is occupied by the public and businesses. Questions include:

- How is this restricted area going to be managed and who is responsible?
- Is the restricted area going to be dug out, trenched, etc. and if trenching or digging is done, what will happen with the contaminated soil? How will the owner ensure that the soil is handled properly?
- Will the restricted area be roped off from the earthwork? How will the restricted area be used during the development of the project (e.g.- staging, parking, etc.)?
- How will the restricted area be identified and kept separate during re-zoning and parcel development?
- What will be the ultimate use of the restricted area be after the development is complete?

Recommendation:

- The LEA requests a detailed plan of the proposed work in the restricted area. The plan should include and identify current parcels, proposed parcels, work proposed, project use of the area, soil handling, and disposal. The LEA needs this information to determine if the project meets the post closure land use regulations and ensures that the public will not be exposed to these chemicals.
- Identify the measure and test results (hydrology and soil and groundwater testing) demonstrating the water supply is safe from contamination.

Groundwater and Water Supply:

The Draft Water Study, dated January 2023, prepared by Morton & Pitalo (“Water Study”) includes a proposed Public Water System (PWS) water well location within the boundaries of parcel 0111-040-010. This lies in proximity (450-700 ft.) to the historic Dixon Downs / Mistler Farms landfill site, which is listed under the California State Calrecycle Solid Waste Information System (SWIS) #48-CR-0024 as described above. What measures will be taken to protect residents from residual contaminants associated with the former site usage and landfill?

Also, the Dixon Consultation Zone, which is the Dixon Business Park, is an open remediation site due to nitrate contamination of groundwater from a former stockyard, Monfort meat processing facility, which had unlined wastewater disposal ponds. One of the proposed water supply wells for the development is less than one mile north of this Dixon Consultation Zone (Zone). The Regional Water Quality Control Board (RWQCB) requires that Solano County coordinate and consult with them during the permitting process on the location and design of any new potable water supply wells proposed within the Zone.

The applicant will need to secure a water well drilling permit from Solano County Environmental Health to drill the proposed water well supplying the development. Due to the proposed location’s proximity to the closed landfill and Zone, Environmental Health will require approval for the well location from the Division of Drinking Water (DDW) to approve and issue a water well drilling permit at this location. Environmental Health encourages the applicant to contact the Division of Drinking Water: Marco Pacheco, P.E., Senior Water Resource Control Engineer, San Francisco District, Division of Drinking

Water, State Water Resources Control Board, 850 Marina Bay Parkway, Bldg. P-2nd Fl., Richmond, CA 94804; Phone: (510) 620-3454; E-mail: marco.pacheco@waterboards.ca.gov.

The provided application materials do not contain approval of a Preliminary Technical Report (PTR), or any documentation from DDW, which indicates that they have approved the siting of a PWS water well in this location, nor expansion of the existing City of Dixon Public Water System CA4810009.

Additionally, the Water Study proposes a single 12-inch diameter point of connection from the existing Dixon water infrastructure, on Vaughn Road, to the project area. The Water Study acknowledges that this contrasts with the four points of connection proposed under the existing City of Dixon Water System Master Plan (WSMP). SCEH highly recommends multiple points of connection between the existing water infrastructure and the proposed development water infrastructure to allow for easier repair and maintenance and provides system redundancy in case of an emergency or damage to the system.

Environmental Health is not familiar with the 2016 City of Dixon Water System Master Plan (WSMP) but would encourage the City of Dixon to ensure the WSMP Demand Value calculations used in the Water Study have taken the State's recent (circa 2021-2023) lessening of restrictions on the construction of Accessory Dwelling Units (ADUs). While not every residential lot within the proposed development will seek to construct an ADU, a significant percentage may, and this additional water demand may need to be factored into the 2016 WSMP.

Since the City of Dixon is a member of the Solano Subbasin Groundwater Sustainability Agency (GSA) and overlies the Solano Subbasin, any changes in the City's groundwater supply will need to be documented in the Groundwater Sustainability Plan (GSP) Annual Groundwater Reporting to monitor any unintended consequences. One of the proposed wells is located east of the Northwest Focus Area identified in the Solano Subbasin GSP where consistent decline in groundwater levels have been documented over the last twenty years. Due to the capacity of the proposed well (1,500 gpm) and its vicinity to this area of declining water table, it is prudent to have a better understanding of the wells hydro-geological impacts on surrounding wells and the aquifer.

Recommendation:

- The city and developer(s) should coordinate with the Regional Water Quality Control Board and County regarding any new well siting and requirements for municipal purposes due to onsite and surrounding past and existing land uses even though it is not exactly within the Dixon Consultation Zone. Evaluation should be done to ensure that a municipal well in this area would not substantially change hydrology and lead to expansion of impacted areas.
- The City shall keep the Solano GSA informed and updated for any future changes in its water supply and coordinate with the Solano GSA in any future groundwater development.

Sewer

The Draft Sewer Study, dated February 16, 2023, prepared by Morton & Pitalo ("Sewer Study") includes Table 4: Sewer Capacity Analysis Summary, which appears to propose that some sewer mains (21-inch diameter) are installed with as little as a 0.0009 (0.09%) slope. The study also appears to propose that sewer lines (6-inch diameter) can be installed with as little as a 0.0011 (0.11%) slope. Environmental Health is concerned that these slopes may not provide adequate sewage velocity and encourages the applicant to provide justification for these slopes.

Additionally, the Sewer Study proposes a single point of connection between the existing City of Dixon sewer infrastructure and the project area. SCEH highly recommends multiple points of connection between the existing sewer infrastructure and the proposed development sewer infrastructure – this may allow for easier repair and maintenance and provides system redundancy in case of an emergency or damage to the system.

Recommendation:

- Work with permitting agencies (Regional Water Quality Control Board; Public Works) to ensure that the design of the sewer system provides proper slopes and redundancy reduce public health hazards from blockages.

Drainage

Solano County is currently working on a One Water Framework to facilitate an integrated approach to water resource planning and management. The planning of drainage, water supply, and sewer system within the Dixon 257 project should consider approaches to address drainage, groundwater protection, and other beneficial regional solutions. Water flows across jurisdictional boundaries as noted in the draft Drainage Study that the drainage water temporarily stored in the detention basin will eventually be discharged into the Tremont 3 drainage system, which is in the unincorporated area. We encourage the City and project proponents to consider drainage and basin designs to maximize groundwater recharge or other potential reuse, a much-needed resource for the local area through multi-benefits.

Recommendation:

- The city, developer, GSA, and the surrounding drainage agencies (i.e., SID, RCDs, RD 2068) should coordinate and collaborate in their efforts of finding integrated solutions to drainage, sewer, and water supply challenges by maximizing benefits in their project development.

Note: The project proposes sewer, water, and drainage improvements in areas immediately adjacent to the County's existing Industrial-Agricultural Service Area that contains existing agricultural support facilities, including Campbell's. These ag-service industries utilize individual wastewater collection and disposal systems, water supply wells and on-site drainage facilities. The County Board of Supervisors held a priority setting session on April 18, 2023 that identified the need for a countywide master utility study to help support economic development and agricultural development and preservation. Provision of community sewer, water, and drainage could be beneficial for existing businesses and allow further development of agricultural support industry in this zoning district. Opportunity exists for the City and County to evaluate potential partnerships that may be beneficial to both entities to determine and provide the infrastructure needs throughout the area to further promote economic development and agricultural preservation/development.

Again, thank you for the opportunity to comment. Please contact me with any questions at 707-784-3157 or tschmidtbauer@solanocounty.com.

Sincerely,



Terry Schmidtbauer

Director of Resource Management