RESOLUTION NO. 2025-003

A RESOLUTION OF THE DIXON PLANNING COMMISSION RECOMMENDING TO THE DIXON CITY COUNCIL CERTIFICATION OF THE CAMPUS PROJECT ENVIRONMENTAL IMPACT REPORT (STATE CLEARINGHOUSE #2023080739); AND ADOPTION OF ENVIRONMENTAL FINDINGS AND ADOPTION OF A MITIGATION MONITORING AND REPORTING PROGRAM PURSUANT TO THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

WHEREAS, The Campus Project ("Project") proposes development of low, medium, and high density housing, employment opportunities through commercial uses and the Dixon Opportunity Center, parks and open space areas, a new groundwater well, and a stormwater retention basin, roadways and both on and off site improvements in the Northwest Quadrant Specific Plan area; and

WHEREAS, the City identified potential impacts of the Project that could have a direct or indirect reasonably foreseeable physical environmental effect at the time the Project is implemented; and

WHEREAS, implementation of the Project will further the City's goals of developing within the City's existing City boundaries, growing within the specified growth area of the Northeast Quadrant Specific Plan area, providing much needed infrastructure to the Northeast Specific Plan area, creating an economically diversified housing stock with various product types for its residents, and creating an employment center that will bring high quality jobs to the City; and

WHEREAS, implementation of the Project will result in amending the Northeast Quadrant Specific Plan, approving a Large-Lot Vesting Tentative Subdivision Map, approving a Small-Lot Tentative Subdivision Map, approving a Planned Development Rezoning and standards, approving Design Review for approval of Design Guidelines and site improvements, and adopting a Development Agreement; and

WHEREAS, the adoption and implementation of the Project is subject to review under the California Environmental Quality Act (CEQA); and

WHEREAS, pursuant to Public Resources Code section 21067 of the California Environmental Quality Act (Pub. Resources Code, § 21000 *et seq.*) ("CEQA"), Section 15367 of the State CEQA Guidelines (Cal. Code Regs., tit. 14, § 15000 *et seq.*), the City is the lead agency for the Project; and

WHEREAS, pursuant to CEQA and the State CEQA Guidelines, the City determined that an Environmental Impact Report ("EIR") should be prepared to analyze all potential adverse environmental impacts of the Project; and

WHEREAS. Senate Bill 18 (SB18) requires local governments to consult with California Native American Tribes about local land use planning decisions for the purpose of protecting traditional tribal cultural places and sacred sites. This project proposes an Amendment to the City of Dixon's Northeast Quadrant Specific Plan (NEQSP) and therefore is subject to the requirements of SB 18. Furthermore, Assembly Bill 52 (AB52) requires projects that prepare an EIR to consult with the local tribe. On May 20, 2023, the City initiated requests to all potentially affected tribes for SB18/AB52 tribal consultations, and, as a result, the City received a response from the Yoche Dehe Tribe (YD-09132022-02) and conducted it's consultation. Based on the consultation, the City received a letter dated August 3, 2023, citing their requests for mitigation measures to be included as part of the project EIR. These measures have been incorporated into the EIR.

WHEREAS, the City issued a Notice of Preparation ("NOP") for the Draft EIR on August 20, 2023, which was sent to each responsible agency, trustee agency, the Office of Planning and Research ("OPR"), and interested parties, including members of the public who had requested such notice; and

WHEREAS, the City held a public scoping meeting on September 20, 2023 to further solicit comments on the scope of the Draft EIR; and

WHEREAS, on May 24, 2024, the City initiated a 45-day public review and comment period of the Draft EIR for the Project and released the Draft EIR for public review and comment; and

WHEREAS, pursuant to State CEQA Guidelines section 15086, the City consulted with and requested comments from all responsible and trustee agencies, other regulatory agencies, and others during the 45-day public review and comment period; and

WHEREAS, the City received 11 comments (or letters) during the 45-day public review and comment period; and

WHEREAS, the Planning Commission held a publicly noticed meeting to receive comments on the adequacy of the Draft EIR on July 9, 2024, and oral testimony from the public was received and noted and the Planning Commission provided their comments on the DEIR, and

WHEREAS, the City has prepared a Final EIR, which includes the written comments received on the Draft EIR, the oral testimony from the Planning Commission public meeting, and the City's response to the comments. In addition, the Final EIR analyzed changes made to the Land Plan since the Draft EIR hearing to address public and staff comments by moving the location of the retention basin and the high density areas. For the purposes of this Resolution, the "EIR" shall refer to the Draft EIR, as revised by the Final EIR, together with the other sections of the Final EIR; and

WHEREAS, the purpose of the changes to the Land Plan were to place the retention basin across from Campbell's, instead of housing, to address comments raised about concerns with residents across the street from their facility. The revision does not change overall intensity or scope of project, just location of the retention basin. This change was evaluated, and corresponding analysis is included in FEIR. The revision to the project and the changes to the DEIR as a result of comments, did not create new impacts or change level of significance of any impact, therefore recirculation of the DEIR is not required

WHEREAS, pursuant to California Code of Regulations, title 14 ("CEQA Guidelines") section 15090, the lead agency's decision-making bodies shall review the Final EIR and certify that the Final EIR was prepared in compliance with CEQA; and

WHEREAS, the entire Draft EIR And Final EIR were made available for public review for the statutory periods of time and copies were also provided to the Commission and Council. The Draft EIR and Draft EIR and Final EIR are referenced and identified in **Exhibit A**.

WHEREAS, pursuant to CEQA Guidelines section 15091, the City has prepared certain findings of fact, as set forth in **Exhibit B** to this Resolution, attached hereto and incorporated herein, based upon the oral and written evidence presented to it as a whole and the entirety of the administrative record for the Project, which are incorporated herein by this reference; and

WHEREAS, environmental impacts that are identified in the EIR as less than significant and do not require mitigation are described in **Section 2** of **Exhibit B**; and

WHEREAS, environmental impacts that are identified in the EIR that are less than significant with incorporation of feasible mitigation measures are described in **Section 3** of **Exhibit B**; and

WHEREAS, environmental impacts identified in the EIR as significant and unavoidable even with the implementation of feasible mitigation are described in **Section 4** of **Exhibit B**; and

WHEREAS, the cumulative impacts of the Project, identified in the EIR and set forth herein, are described in **Section 5** of **Exhibit B**; and

WHEREAS, the project will not result in any significant growth-inducing impacts as set forth in the EIR and further discussed in **Section 6** of **Exhibit B**; and

WHEREAS, an analysis of alternatives to the Project as set forth in the EIR is further discussed in **Section 7** of **Exhibit B**; and

WHEREAS, pursuant to CEQA Guidelines sections 15091 and 15097, all the mitigation measures identified in the EIR to substantially lessen the potentially significant impacts of the Project are set forth in the Mitigation Monitoring and Reporting Program (MMRP) included as **Exhibit C** to this Resolution, attached hereto and incorporated herein; and

WHEREAS, prior to taking action, the City Council has heard, been presented with, reviewed and considered all of the information and data in the administrative record, including the EIR, and all oral and written evidence presented to it during all meetings and hearings relating to the Project; and

WHEREAS, the EIR reflects the independent judgment of the City Council and is deemed adequate for purposes of making decisions on the merits of the Project; and

WHEREAS, the City has not received any comments or additional information that constituted substantial new information requiring recirculation of the EIR under Public Resources Code section 21092.1 or State CEQA Guidelines section 15088.5; and

WHEREAS, all the requirements of CEQA and the State CEQA Guidelines have been satisfied by the City in the EIR, which is sufficiently detailed so that all of the potentially significant environmental effects of the Project have been adequately evaluated; and

WHEREAS, the Final EIR was published and noticed for public review for 18 days ahead of the Planning Commission meeting, to provide additional time since the Final EIR incorporated and evaluated modifications changes to the project in the location of the retention basin and high density residential housing sites on the land plan to address City and public comments; and

WHEREAS, following notice duly provided as required by the law, the Planning Commission held a public hearing on March 5, 2025, which all interested parties were given an opportunity to comment on the Final EIR, CEQA Findings, and MMRP prior to the Planning Commission's recommendation to the Dixon City Council ("City Council"), and

WHEREAS, on March 5, 2025, by separate Resolutions, the Dixon Planning Commission has considered and provided their recommendation on the planning applications, including the Development Agreement, Specific Plan Amendment, Planned Development Rezoning, Large Lot Vesting Tentative Map, and Small Lot Vesting Tentative Map and Design Review; and

WHEREAS, on March 5, 2025, by separate Resolution, the Dixon Planning Commission has considered the remaining potentially significant impacts and provided their recommendation to adopt a Statement of Overriding Considerations; and

WHEREAS, all other legal prerequisites to the adoption of this Resolution have occurred,

THE PLANNING COMMISSION OF THE CITY OF DIXON DOES HEREBY RESOLVE AS FOLLOWS:

SECTION 1. The above recitals are true and correct and incorporated herein by reference.

SECTION 2 The Planning Commission was presented with the Draft EIR and the Final EIR, as identified in **Exhibit A.**

SECTION 3. The Planning Commission hereby finds and recommends to the Dixon City Council that it has been presented with the EIR, which it has reviewed and considered, and further finds that the EIR is an accurate and objective statement that has been completed in full compliance with CEQA and the State CEQA Guidelines. The Planning Commission finds and recommends that the EIR reflects the independent judgment and analysis of the City. The Planning Commission declares that no evidence of new significant impacts or any new information of "substantial importance" as defined by State CEQA Guidelines section 15088.5, has been received by the City after circulation of the Draft EIR that would require recirculation. Therefore, the Planning Commission hereby recommends that the City Council certify the EIR based on the entirety of the record of proceedings.

SECTION 4 The Final EIR addresses minor changes to the project land use plan that were made following the review of the DEIR. Based on comments raised during the DEIR process and in response to feedback from City staff and decision makers, the applicant has revised the land plan to relocate the retention basin from the south end (along Pedrick Rd) to the center of the eastern side (along Pedrick Rd) and relocate single-family homes from its previous location in the center of the Project and move them to the former site of the retention basin, and also relocate the multi-family housing westward and away from Pedrick Road and moving Dixon Opportunity Center uses to the former multi-family housing site. The purpose of the changes were to place the retention basin across from Campbell's Processing facility, instead of housing, to address comments raised about concerns with residents across the street from their facility, and to move the multi-family housing farther from Campbell's facility. The revision does not change overall intensity or scope of project, just location of the retention basin and multi-family housing. Thes changes were evaluated, and corresponding analysis is included in FEIR. The revision to the project and the changes to the DEIR did not create new impacts or change level of significance of any impact, and some revisions to mitigation measures may further reduce impacts, therefore recirculation of the DEIR is not required.

SECTION 5. The Dixon Planning Commission considers and recommends to the City Council adoption of the CEQA Findings of Fact pursuant to State CEQA Guidelines section 15091, which is attached hereto as **Exhibit B** and incorporated herein by this reference.

SECTION 6. Pursuant to Public Resources Code section 21081.6, the Planning Commission recommends that the City Council adopt the Mitigation Monitoring and Reporting Program attached hereto as **Exhibit B** and incorporated herein by this reference, and make implementation of the Mitigation Measures contained in the Mitigation Monitoring and Reporting Program a condition of approval of the Project. In the event of any inconsistencies between the Mitigation

Measures set forth in the EIR or the Findings of Fact and the Mitigation Monitoring and Reporting Program, the Mitigation Monitoring and Reporting Program shall control.

SECTION 6. The location and custodian of the documents and any other material that constitute the record of proceedings on which this Resolution has been based are located at 600 East A Street, Dixon, CA 95620. The custodian for these records is the City of Dixon City Clerk. This information is provided pursuant to Public Resources Code section 21081.6.

SECTION 7 Planning Commission recommends that the City Council direct City staff to cause a Notice of Determination to be filed and posted with the County Clerk and the State Clearinghouse within five working days of approval of the Project.

ADOPTED, AT A SPECIAL MEETING OF THE PLANNING COMMISSION OF THE CITY OF DIXON, STATE OF CALIFORNIA, ON THE 5TH DAY OF MARCH, 2025.

AYES: Allard, Cooley, Davis, Drayton, Hernandez-Covello, Chair Caldwell
NOES: None
ABSENT: Diaz
ABSTAIN: None

JACK CALDWELL, CHAIR
DIXON PLANNING COMMISSION

Attest:

BRANDI ALEXANDER
DEPUTY CLERK/SECRETARY

Exhibit A: Findings of Fact

Exhibit B: Mitigation Monitoring and Reporting Program

Exhibit C: Draft EIR and Final EIR

EXHIBIT "A"
FINDINGS OF FACT

The California Environmental Quality Act (Pub. Resources Code, § 21000 et seq.) ("CEQA") provides that public agencies shall not approve or carry out a project for which an environmental impact report ("EIR") has been certified that identifies one or more significant adverse environmental effects of a project unless the public agency makes one or more written Findings for each of those significant effects, accompanied by a brief explanation of the rationale for each Finding (State CEQA Guidelines [Cal. Code Regs., tit. 14, § 15000 et seq.], § 15091). This document presents the CEQA Findings of Fact made by the City of Dixon, in its capacity as the CEQA lead agency, regarding The Campus project ("Project"), evaluated in the Draft Environmental Impact Report ("Draft EIR") and Final Environmental Impact Report ("Final EIR") for the Project.

SECTION 1: INTRODUCTION

Pursuant to Section 15091 of the State CEQA Guidelines, where an EIR for a project determines that the project will have one or more significant environmental impacts, a public agency may only approve or carry out the project if the agency makes one or more of the following written finding(s) for each of those significant effects, accompanied by a brief explanation of the rationale for each finding:

1. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.

2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the final EIR.

While CEQA requires that lead agencies adopt feasible mitigation measures or alternatives to substantially lessen or avoid significant environmental impacts, an agency need not adopt infeasible mitigation measures or alternatives. (Pub. Resources Code, § 21002.1(c) [if "economic, social, or other conditions make it infeasible to mitigate one or more significant effects on the environment of a project, the project may nonetheless be carried out or approved at the discretion of a public agency"]; see also State CEQA Guidelines, § 15126.6(a) [an "EIR is not required to consider alternatives which are infeasible"].) CEQA defines "feasible" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors." (Pub. Resources Code, § 21061.1.) The State CEQA Guidelines add "legal" considerations as another indicia of feasibility. (State CEQA Guidelines, § 15364.) Project objectives also inform the determination of "feasibility." (*Jones v. U.C. Regents* (2010) 183 Cal. App. 4th 818, 828-829.) "'[F]easibility' under CEQA encompasses 'desirability' to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors." (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 401, 417; see also *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 715.) "Broader considerations of policy thus come into play when the decision making body is considering actual feasibility." (*Cal. Native Plant Soc'y v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 1000; see also Pub. Resources Code, § 21081(a)(3) ["economic, legal, social, technological, or other considerations" may justify rejecting mitigation and alternatives as infeasible].)

Environmental impacts that are less than significant do not require the imposition of mitigation measures. (*Leonoff v. Monterey County Board of Supervisors* (1990) 222 Cal.App.3d 1337, 1347.)

The California Supreme Court has stated, "[t]he wisdom of approving . . . any development project,

a delicate task which requires a balancing of interests, is necessarily left to the sound discretion of the local officials and their constituents who are responsible for such decisions. The law as we interpret and apply it simply requires that those decisions be informed, and therefore balanced." (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 576.)

SECTION 2. FINDINGS REGARDING LESS-THAN-SIGNIFICANT IMPACTS NOT REQUIRING MITIGATION

Consistent with Public Resources Code section 21002.1 and State CEQA Guidelines section 15128, the EIR focused its analysis on potentially significant impacts, and limited discussion of other impacts for which it can be seen with certainty that there is no potential for significant adverse environmental impacts. State CEQA Guidelines section 15091 does not require specific findings to address environmental effects that an EIR identifies as "no impact" or a "less than significant" impact. Nevertheless, the City hereby finds that the Project would have either no impact or a less-than-significant impact to the following resource areas:

A. AESTHETICS

1. Scenic Vistas

Threshold: Would the Project have a substantial adverse effect on a scenic vista?

Findings: Less-than-significant impact. (Draft EIR, pp. 3.1-12 through 3.1-13.)

Explanation: Development of the Project would convert the site from its existing use as undeveloped land previously used for agricultural uses to developed residential housing, mixed-use development, commercial uses, and park and trail areas. Implementation of the Project would result in the construction of new single- and multi-story residential units, commercial buildings with outdoor signage, industrial or business-park-like buildings in the DOC, parks and paseos, and a 25-acre retention basin. These new structures and uses could impede existing vista views in the area.

The Project site is not designated as a scenic vista by the City of Dixon General Plan, nor does it contain any unique or distinguishing features that would qualify the site for designation as a scenic vista. Development of the NEQSP area was contemplated in the City's General Plan EIR, and would be governed by the NEQSP General Design Guidelines. In compliance with the NEQSP General Design Guidelines, the Project would incorporate adjacent open space as a visual amenity, include landscaped building setbacks, and preserve view corridors through the site. As mentioned previously, existing panoramic views across the Project site include slight, varied views of the Sierra Nevada to the east and the Coastal Mountain Range to the distant west. Views immediately surrounding the Project site are either dominated by urban, light industrial, or manufacturing uses or agricultural open fields.

Building design would be governed by a variety of guidelines including the broad objectives identified in the NEQSP General Design Guidelines such as siting buildings with regard to the physical features of each Project parcel and adjacent parcels. More specific design guidance is found in the City Municipal Code Section 18.23 which recognizes the interdependence of land values and aesthetics and to provide methods to promote sound land use development and assist in the development of architectural standards and guidelines for residential, office, commercial, retail business, and industrial structures. Chapter 18.23 establishes the height limitations, screening and landscaping, setbacks, and design review requirements for new development. As established in Chapter 18.23, the City Design Review Commission is responsible for reviewing the location, design, and intensity of all exterior lighting of new development. The City of Dixon Planning Commission serves as the City Design Review Commission.

Various temporary visual impacts could occur as a result of construction activities as the Project develops, including grading, equipment and material storage, and staging. Though temporary, some of these impacts could last for several weeks or months during any single construction phase. However, these construction-related impacts would be temporary and viewer sensitivity in the majority of cases would be slight to moderate.

Although the Project site would be converted from an open area to urban uses, compliance with established design guidelines and the creation of view corridors through the Project site would result in a less-than-significant impact to scenic vistas. (Draft EIR, pp. 3.1-12 through 3.1-13.)

2. Existing Visual Character or Quality of Public Views in Non-Urbanized Areas

Threshold: Would the Project result substantially degrade the existing visual character or quality of public views of the site and its surroundings or conflict with applicable zoning and other regulations governing scenic quality?

Findings: Less-than-significant impact. (Draft EIR, pp. 3.1-13 through 3.1-15.)

Explanation: The Project site is highly visible from I-80, Vaughn Road, and Pedrick Road. Implementation of the Project would change the existing visual character of the site from an undeveloped site to an urbanized site. The Project would result in an incremental increase in new residential and mixed use development that would alter the existing visual character, scenic resources, and natural features within the urbanized portions of the City of Dixon, thereby incrementally altering the quality of public views from publicly accessible vantage points within the urbanized portions of the City.

The Project would result in the conversion of undeveloped land to urban uses, which would contribute to changes in the regional landscape and visual character of the area. Development of the DOC and the commercial area in the northern portion of the Project site would be consistent visually with existing commercial uses to the north and west of the Project site, such as the TEC Equipment facility to the north and the Walmart Supercenter and GE Dixon Distribution Center to the west. Proposed commercial building heights, colors, and architecture would be similar in nature to surrounding uses, and commercial buildings would be set back a sufficient distance and designed to minimize visual impacts on adjacent uses to the extent practicable. Primary building and Project entries would be well-defined by accent treatments including, but not limited to, special textures, forms, materials, colors, and landscaping in order to provide a sense of entry and facilitate orientation for users and residents. The proposed commercial buildings would be oriented toward the street.

Proposed residential uses could be up to three stories for high density residential units and up to two stories for medium and low density residential units. Proposed architectural styles for residential units would be complementary in style, colors, and materials without being monotonous.

The proposed retention basin would be approximately 20 feet deep and cover 25.14 acres. The basin would be visually screened by trees and decorative/security fencing along Commercial Drive, along with a landscaped buffer around the east, west, and south edges.

The Project Site would include three parks: North Park, a Neighborhood Park, and a Linear Park. All three parks would be extensively landscaped with trees, shrubbery, and turf, and include amenities such as covered picnic areas, play areas, pickleball and basketball courts, a softball field/soccer field, a disc golf course, outdoor benches, multi-use paths, and pedestrian and bicycle connections to the DOC, adjacent

residential areas, and other park features. The parks would be located in the middle of the Project site, and would serve as a north-south visual break across the site.

Further, streetscapes would be planted with trees and shrubbery to create a consistent feel throughout the Project site. Proposed soundwalls along Pedrick Road, Commercial Drive, and Professional Drive would be visually screened by trees and landscaping.

Development within the Project site is required to be consistent with the General Plan and the Dixon Zoning Ordinance which include design standards in order to ensure quality and cohesive design of the Project site. Zoning Ordinance requirements associated with site planning and development regulations include height limitations, screening and landscaping, setbacks, and design review requirements established in Section 18.23. These standards include specifications for building height, massing, and orientation; exterior lighting standards and specifications; and landscaping standards. This includes the requirement that no multi-family residential structure exceed 38 feet in height, 30 feet in height for single-family residential structures, 35 feet in height for community commercial structures, and that the maximum height of structures for public services be the same as the adjacent zoning districts. Furthermore, as established in Section 18.23 Screening and Landscaping of the City's municipal code, all commercial and industrial districts are required to provide screening and landscaping along all zone boundaries, other than streets, where the building site abuts residential zoning districts. Chapter 18.33 of the City's municipal code also requires that single family residential uses provide at least one street tree for each 50 feet of street frontage. Non-residential and multi-family structures require two street trees are required for each 50 feet of street frontage. According to the Project vesting tentative map, setbacks along public frontages of the Project boundaries are setback varying between 10 feet to 20 feet. The Project would include visual components that would assist in enhancing the appearance of the site following site development. These improvements would include landscaping improvements such as new street trees and other vegetation landscaping and multi-use trails. Implementation of the design standards would ensure quality design throughout the Project site, and result in a Project that would be internally cohesive while maintaining aesthetics similar to surrounding uses.

As described in Article 18.23.010 of the Dixon Municipal Code, the purpose of design review is to promote sound land use development; assist in the development of architectural standards and guidelines for residential, office, commercial, retail business, and industrial structures. Under Article 40.31.020 of the Dixon Municipal Code, the functions of design review are to review the following:

a) Siting of all structures;

b) Landscaping, fencing, and other screening as designed on a landscape or irrigation plan featuring all existing trees and shrubs and proposed plantings;

c) Design of all circulation and parking and loading facilities for automobiles and bicycles;

d) Location, design and screening of garbage/recycling facilities;

e) Details of fencing, public works items such as curb cuts, curbs, gutters, sidewalks, sidewalk design, drainage, and fire hydrants;

f) Location, design and intensity of all exterior lighting;

g) Location and design of addressing system or graphics and mail delivery system;

h) Location and design of all required open space areas;

i) Exterior elevations or perspective drawings of structures including but not limited to building height, description of all building materials, building colors, screening of utility meters and mechanical equipment;

j) Design, placement, dimension, colors of all proposed signs and exterior graphics as required by this title;

k) Design and placement of facilities for disabled persons; and

l) Design of facilities for compliance with Attachment 4 of California State Water Resources Control Board's Water Quality Order No. 2003-005-DWQ, as may be amended, supplemented or superseded.

Design guidelines, City Code, and site plan and design review processes would ensure that Project development and design would be guided in a cohesive manner, and the impact on the visual character of the site would be less than significant. (Draft EIR, pp. 3.1-13 through 3.1-15.)

B. AGRICULTURE RESOURCES

1. Other Changes

Thresholds: Would the implementation of the Project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

Findings: Less-than-significant impact. (Draft EIR, pp. 3.2-10 through 3.2-11.)

Explanation: Lands to the east of the Project site are designated by Solano County as Agricultural, and would continue to be in agricultural production. A portion of those lands are designated as Prime Farmland, Urban and Build-Up Land (Campbell Soup Supply Company), and Other Land. Areas to the east of the Project site are outside of the Dixon city limits and are governed by the Solano County General Plan.

West of the Project site are lands that are within the NEQSP area and are planned for development under the City's General Plan and the NEQSP. However, there are portions of currently undeveloped land west of the Project site, north of the Walmart store, and south of I-80 that are identified as Prime Farmland by the FMMP. Other areas to the southwest, but within the NEQSP area, include Grazing Land and Urban and Built-Up Land (Walmart and GE Dixon Distribution Center). The Project includes features and requirements that provide buffers between it and adjacent farmlands, such as widened roadways with bike lanes and/or multi-use paths, fencing, landscaping and trees, etc. (Draft EIR, e.g., pp. 2-6 through 2-7, 3.1-14 through 3.1-15, 3.11-15, 3.15-3.)

Although development of the Project would require the connection of essential infrastructure, including roadways, water, sewer, storm drainage connections, between existing facilities to the west and the Project site, these infrastructure expansions would occur in areas already anticipated for development in the NEQSP area. Infrastructure would be placed within existing roadways or within roadways proposed by the Project.

General Plan policy LCC-1.1 states that the City will recognize and maintain the city as a community surrounded by productive agricultural land and greenbelts. Policy NE-1.1 states that the City will preserve the natural open space and agricultural lands that surround Dixon through continued leadership in cross-jurisdictional conservation initiatives. Compliance with City policies would preserve agricultural lands beyond the Project site.

Development of the Project would not result in the conversion of, or other changes to, the environment that could result in the conversion of Important Farmland to non-agricultural use. Therefore, the impact would be less than significant. (Draft EIR, pp. 3.2-10 through 3.2-11.)

C. AIR QUALITY

1. CO Hot Spot

Threshold: Would the Project increase the concentrations or number of CO hot spots?

Findings: Less-than-significant impact. (Draft EIR, pp. 3.3-28 through 3.3-29.)

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

The CO screening approach outlined in the YSAQMD's Handbook for Assessing and Mitigating Air Quality Impacts (2007) was used to estimate whether or not the Project's traffic impact would cause a potential CO hotspot. The CO screening approach uses the following screening criteria:

- Does the peak-hour Level of Service (LOS) on one or more streets or at one or more intersections in the Project vicinity reduce to an unacceptable LOS (typically LOS E or F)? or
- Will the Project substantially worsen an already existing peak-hour LOS F on one or more streets or at one or more intersections in the Project vicinity? (Note: This includes situations where the average delay would increase by 10 seconds or more when Project-generated traffic is included.)

If the answer to the screening criteria is "yes," then the Project can be said to have the potential to create a violation of the CO standard and further modeling may be warranted. If the answer to the screening criteria is "no," then further modeling is not warranted and the Project would not create a violation of the CO standard.

The traffic impact analysis contained in Section 3.15 examined Level of Service (LOS) for intersections and road segments affected by the Project. As shown in Section 3.15 of this EIR, all intersections except the I-80 Eastbound Ramps – Sparling Lane / Pedrick Road intersection would continue to operate above the minimum City of Dixon LOS D standard. The I-80 Eastbound Ramps – Sparling Lane / Pedrick Road intersection would decline to LOS E (43.6 seconds per vehicle [spv]) during the p.m. peak hour. However, this overall intersection LOS would result in the intersection operating at LOS C conditions (34.3 spv) with the installation of the proposed traffic signal (see Section 3.15 for details). Therefore, the Project would not reduce peak-hour LOS on any streets or intersections to an unacceptable LOS, or substantially worsen an already existing peak-hour LOS F on any streets or intersections, during the non-cumulative scenarios, after installation of the proposed traffic signal.

However, under the cumulative scenario, three intersections will operate below the City LOS D threshold under 2040 plus Project conditions. These include the Pedrick Road / I-80 Westbound Ramps – Sievers Road intersection, Pedrick Road at I-80 Eastbound Ramps – Sparling Lane and the Pedrick Road at Professional Drive intersection. All are projected to operate at LOS E or F conditions. In addition, the

westbound queues in the left and right turn lanes along Dorset Drive at N. First Street will exceed the available storage. See Appendix G of this EIR for further detail.

However, the cumulative conditions scenario is speculative (in that it is unclear that all of these Projects would be built by the buildout timeframe, if at all). Moreover, traffic volumes for the intersections and streets, as identified by the traffic analysis (see Section 3.15 of this EIR), do not rise to a level sufficient to feasibly cause a CO Hotspot impact. The potential for the creation of a CO hotspot would require a roadway segment or intersection with peak hour traffic volumes in the tens of thousands. However, there are no traffic intersections or roadways that would be affected the Project that would reach this level of traffic volume; therefore, there is no potential for the creation of a CO hotspot that would result in violations of applicable ambient air quality standards, and further modeling is not warranted.

Since the Project is within an attainment area for carbon monoxide (ambient air quality standards are currently attained) and in an area with low background concentrations, and since it is not expected that a CO hotspot would be generated by the Project under cumulative and non-cumulative scenarios, changes in carbon monoxide levels resulting from the Project would not result in violations of the ambient air quality standards, and would represent a less than significant impact. (Draft EIR, pp. 3.3-28 through 3.3-29.)

2. Odors

Threshold: Would the Project expose sensitive receptors to odors?

Findings: Less-than-significant impact. (Draft EIR, pp. 3.3-32 through 3.3-34.)

Explanation: While offensive odors rarely cause any physical harm, they can be unpleasant, leading to distress among the public and often generating citizen complaints to local governments and the YSAQMD. The general nuisance rule (Health and Safety Code §41700 and YSAQMD District Rule 2.5) is the basis for the YSAQMD threshold. A project may reasonably be expected to have a significant adverse odor impact where it "generates odorous emissions in such quantities as to cause detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which may endanger the comfort, repose, health, or safety of any such person or the public, or which may cause, or have a natural tendency to cause, injury or damage to business or property."

As discussed under Impact 3.3-4, implementation of the Project would not place sensitive receptors adjacent to known toxic air contaminants above the applicable standards and thresholds.

Although the Dixon Downs/Mistler Farm closed landfill is within the Project site, the landfill has undergone a clean closure process, as provided in more detail in Section 3.9, Hazards and Hazardous Materials of this EIR. Specifically, a Clean Closure Plan for the landfill that described the planned excavation and removal of all landfilled wastes was prepared in February 2021 and approved by the Solano County Department of Resource Management, the lead enforcement agency for oversight of landfills within Solano County, in August 2021. The wastes contained in the former abandoned landfill at the Project site were completely excavated in November 2021 and subsequently removed from the site for proper offsite disposal in accordance with the provisions of the approved Clean Closure Plan. The resulting excavation was subsequently backfilled with clean soils. Observations and verification testing performed during the waste excavation work confirmed that all landfilled wastes were removed and that no soil contaminants remained.

Separately, as also described in Section 3.9, Hazards and Hazardous Materials of this EIR, a subsurface investigation conducted in 2005 in the area of a former 10,000-gallon diesel AST (associated with the former Mistler Farm facility, located within the northwestern portion of the Project site) identified

diesel impact to soil and groundwater. Subsequently, remedial soil excavation was performed in this area in 2006 extending to a depth of about 20 feet. Additionally, groundwater monitoring wells were installed in the area of the AST and were sampled/tested over a period of time. Following the remedial and monitoring activities, it was concluded that the limited remaining residual petroleum hydrocarbons in the subsurface attributable to historical releases from the AST did not represent a significant threat to human health or the environment, and would not generate noticeable odors.

Similarly, implementation of the Project would not directly create or generate objectionable odors to a significant degree. The Project would also not place sensitive receptors near objectionable odors. Trash in enclosed areas would be separated at a sufficient distance from nearby residences, and enclosed in industry-standard containers, such that odors from trash would not generally generate noticeable odors for nearby residential receptors. The two closest source of odors includes active agricultural operations located east, west, north, and south of the Project site. However, these sources of odors are transient and are not anticipated to cause substantial offensive odors on the residents or users of the Project. The Campbell's Soup Supply Company is located directly to the east of the Project site; odors from this location during certain times of the year, particularly the tomato harvesting season of June-October, have the potential to be noticed by residents of the Project. However, CEQA does not require analysis of existing sources of odors on new residents; therefore, further discussion of this potential source of odors on new Project receptors is not warranted (California Building Industry Association v. Bay Area Air Quality Management District (2015) 62 Cal. 4th 369). Separately, there are no other known sources of odors within the screening distance of one mile that is recommended by the YSAQMD. Therefore, there are no other known producers of odors within vicinity of the Project site.

The Project does not propose uses that would create new odors that would adversely affect a substantial number of people. Therefore, operation of the Project would not result in significant objectionable odors. Impacts associated with exposure to odors would be less than significant. (Draft EIR, pp. 3.3-32 through 3.3-34.)

D. BIOLOGICAL RESOURCES

1. Special-Status Invertebrate Species

Threshold: Would Implementation of the Project not result in direct or indirect effects on special-status invertebrate species?

Findings: Less-than-significant impact. (Draft EIR, pp. 3.4-26 through 3.4-27)

Explanation: Special-status invertebrates that occur within the 9-quad region for the Project site include: Conservancy fairy shrimp, vernal pool fairy shrimp, midvalley fairy shrimp, valley elderberry longhorn beetle, vernal pool tadpole shrimp, California linderiella, American bumble bee, Antioch multilid wasp, Blennosperma vernal pool andrenid bee, Crotch bumble bee, Delta green ground beetle, Ricksecker's water scavenger beetle, Sacramento Valley tiger beetle, and western bumble bee. Each of these is discussed below:

Vernal Pool Branchiopods: The record search lists several occurrences of the federally endangered vernal pool tadpole shrimp (Lepidurus packardi) and Conservancy fairy shrimp (Branchinecta conservatio), the threatened vernal pool fairy shrimp (Branchinecta lynchi), and the non-listed California linderiella (Linderiella occidentalis) and midvalley fairy shrimp (Branchinecta mesovallensis) as occurring within the nine-quad region for the Project site. These species exclusively inhabit vernal pools or other seasonally ponded wetlands that sustain inundation during the winter before drying in the late spring. The Project site does not provide suitable habitat for this species.

Valley Elderberry Longhorn Beetle: The valley elderberry longhorn beetle (Desmocerus californicus dimorphus) is a federally threatened insect that is dependent upon the elderberry plant (Sambucus sp.) as a primary host species. Elderberry shrubs are a common component of riparian areas throughout the Sacramento Valley region. As noted previously in Table 3.4-4, elderberry shrubs are not located on site. The Project site does not provide suitable habitat for this species.

Crotch Bumble Bee: The crotch bumble bee (Bombus crotchii) is a State Candidate Endangered species which occurs from coastal California east to the Sierra-Cascade crest and south into Mexico. Food plant genera for this species include Antirrhinum, Phacelia, Clarkia, Dendromecon, Eschscholzia, and Eriogonum.

Grassland or scrub habitat for this species is not present in the Project site. Plant species suitable for foraging may occur in the Project site but were not observed during the survey. The Project site has been managed for agriculture and has been subjected to use of herbicides and likely pesticides which are one of the leading causes for decline in bumble bees. Additionally, constant disturbance of soil from agricultural uses is not suitable for underground bee colonies and overwintering queens. This species has been documented in the vicinity of the Project site but is not expected to occur in the Project site based on the conditions described above. As such, this species is not expected to be present on-site.

Delta Green Ground Beetle: The Delta green ground beetle (Elaphrus viridis) is a Federally Threatened species. This species is currently thought to be restricted to the margins of vernal pools in the grassland area between Jepson Prairie and Travis AFB. This species appears to prefer sandy mud substrate where it slopes gently into water.

The Project site does not contain vernal pool or grassland habitat and is outside of the current known range of this species. This species will not occur on-site.

Western Bumble Bee: The western bumble bee (Bombus occidentalis) is a State Candidate Endangered species which occurs in meadows and grasslands with an abundance of floral resources. This species is a generalist forager and have been reported visiting a wide variety of flowering plants such as Melilotus spp., Cirsium spp., Trifolium spp., Centaurea spp., Eriogonum spp., and Chrysothamnus spp. The flight period for queens in California is from early February to late November, peaking in late June and late September. New queens hibernate over the winter and initiate a new colony the following spring. Rare throughout its range and in decline west of the Sierra Nevada crest. The most current known range of this species is limited to areas near the Klamath and northern Coast Range mountains as well as mountain areas in Shasta, Plumas, Sierra, Nevada, Placer, El Dorado, Lassen, Amador, Alpine, and Calaveras counties.

The Project site is outside of the current known range of this species. In addition, the Project site has been managed for agriculture and has been subjected to use of herbicides and likely pesticides which are one of the leading causes for decline in bumble bees. Additionally, constant disturbance of soil from agricultural uses is not suitable for underground bee colonies and overwintering queens. Although suitable foraging habitat may occur on-site, because this species is considered rare throughout its range, it is not expected to occur on the Project site.

Other Insects: There are three other insects that are not formally listed, special-status species, but are included in the CNDDB search results. These include American bumble bee, Antioch multilid wasp, Blennosperma vernal pool andrenid bee, Ricksecker's water scavenger beetle, and Sacramento Valley tiger beetle. While these species are documented within the nine-quad region for the Project site, they are not documented on the Project site. The habitat present on the Project site is not ideal natural habitat for these species and none are believed to be present.

As noted previously, the Project site is in an agricultural setting and is currently used to cultivate various row crops. Dirt access roads and ditches occur throughout the Project site along the perimeters of the fields, and aerial imagery also indicates the ditches are created, moved, and filled as crops are rotated and cultivated. According to the CNDDB records search, there are no documented or observed special-status invertebrate species on the Project site. Additionally, appropriate habitat for these special-status invertebrates were not observed within the Project site during the field survey and none are expected to be affected by the Project. Overall, the Project would have a less-than-significant impact on special-status invertebrate species. (Draft EIR, pp. 3.4-26 through 3.4-27)

2. Special-Status Reptile and Amphibian Species

Threshold: Would the implementation of the Project not result in direct or indirect effects on special-status reptile and amphibian species?

Findings: Less-than-significant impact. (Draft EIR, pp. 3.4-28 through 3.4-29.)

Explanation: Special-status reptiles and amphibians that occur within the nine-quad region for the Project site include: California tiger salamander, western pond turtle, foothill yellow-legged frog - north coast DPS, western spadefoot, and giant garter snake. Each of these is discussed below:

California Tiger Salamander: The California tiger salamander (Ambystoma californiense) is a federal and California threatened species. It typically breeds in fish-free seasonal or permanent ponds associated with grassland communities. California tiger salamander may also breed in deeper ponded vernal pools, seasonal wetlands and/or other seasonal pools within swales or channels. California tiger salamander spends the majority of its life cycle below ground in ground squirrel or pocket gopher burrows in grasslands situated adjacent to potential breeding sites.

Forty-seven units of critical habitat, or habitat that has been deemed as essential to the survival and recovery of the California tiger salamander, were by the USFWS on August 10, 2004. The 5,699-acre Unit 2 (Jepson Prairie Unit) is located approximately 17 miles southwest of the Project site.

Suitable habitat does not occur in the Project site. Aquatic habitats within the Project site are agricultural drainage ditches that appear to be altered regularly in associated with crop rotation and do not consistently hold water. Suitable upland habitat is also lacking from the Project site, and the Project site receives regular disturbance in association with farming activities. As such, this species will not occur on-site.

Western Pond Turtle: The western pond turtle (Emys marmorata) is a California species of special concern. Its favored habitats include streams, large rivers and canals with slow-moving water, aquatic vegetation, and open basking sites. Although the turtles must live near water, they can tolerate drought by burrowing into the muddy beds of dried drainages. This species feeds mainly on invertebrates such as insects and worms, but will also consume small fish, frogs, mammals and some plants. Western pond turtle predators include raccoons, coyotes, raptors, weasels, large fish, and bullfrogs. This species breeds from mid to late spring in adjacent open grasslands or sandy banks.

Agricultural ditches within the Project site appear to be regularly altered in association with crop rotation and do not consistently hold water. The ditches also lack essential habitat components for this species. Although not expected, this species may utilize the ditches within the Project site during dispersal to/from more suitable habitat outside of the Project site. As such, this species is not expected to occur on the Project site.

Foothill Yellow-Legged Frog - North Coast DPS: The foothill yellow-legged frog (Rana boylii pop. 1) is a State Species of Special Concern. This distinct population occurs in the northern coast ranges north of the San Francisco Bay Estuary, Klamath Mountains, and Cascade Range including watershed subbasins: Lower Pit, Battle Creek, Thomes Creek, and Big Chico Creek in Lassen, Shasta, Tehama, and Butte counties. This species occurs in rocky, perennial streams, creeks, and rivers, especially in areas with sunny banks and riffles. Rarely travels far from water. Typically found in forest, chaparral, and woodland habitats.

Suitable aquatic habitat does not occur in the Project site, and the Project site is outside of this species' known range. As such, this species will not occur on-site.

Western Spadefoot: The western spadefoot (Spea hammondii) is a State Species of Special Concern. This species occurs in a variety of open habitats including grasslands, coastal sage scrub, chaparral, sandy washes, and playas. Can also be found in valley-foothill woodlands. This species spends the majority of its life underground and typically emerges between October to May to breed. Breeding occurs in vernal pools, depressional wetlands, and sometimes puddles. Breeding sites must remain inundated for at least 30 days for larvae to mature.

Suitable habitat does not occur in the Project site. Aquatic habitats within the Project site are agricultural drainage ditches that appear to be altered regularly in associated with crop rotation and do not consistently hold water. Suitable upland habitat is also lacking from the Project site, and the Project site receives regular disturbance in association with farming activities. As such, this species will not occur on-site.

Giant Garter Snake: Giant garter snake (Thamnophis gigas) is designated as a federally threatened and state threatened species afforded special protection by USFWS and CDFW. The giant garter snake is generally associated with larger canals, irrigation ditches, and other semi-permanent to permanent aquatic sites with slow moving water and an abundance of emergent vegetation.

Suitable habitat is not present in the Project site. Agricultural ditches within the Project site appear to be regularly altered in association with crop rotation and do not consistently hold water. The ditches also lack essential habitat components for this species. The only occurrence within five miles of the Project site is from 1987 and occurs along Putah Creek which is not hydrologically connected to the Project site. As such, this species will not occur on-site.

Conclusion: Appropriate habitat for these special-status amphibians and reptiles were not observed within the Project site during the field survey and none are expected to be affected by the Project. Overall, the Project would have a less-than-significant impact on special-status amphibians and reptiles. (Draft EIR, pp. 3.4-28 through 3.4-29)

3. Special-Status Fish and Mollusk Species

Threshold: Would implementation of the Project not result in direct or indirect effects on special-status fish and mollusk species?

Findings: No Impact. (Draft EIR, pp. 3.4-29 through 3.4-30)

Explanation: Special-status fish that occur within the nine-quad region for the Project site include: longfin smelt, steelhead - Central Valley DPS, Delta smelt, green sturgeon - southern DPS, and western ridged mussel. These species require aquatic habitat, which is not present within the Project site.

Implementation of the Project would have no impact on special-status fish species. (Draft EIR, pp. 3.4-29 through 3.4-30)

4. Special-Status Mammal Species

Threshold: Would implementation of the Project not result in direct or indirect effects on special-status mammal species?

Findings: Less than Significant Impact. (Draft EIR, pp. 3.4-38 through 3.4-39)

Explanation: Special-status mammals that occur within the nine-quad region for the Project site include: pallid bat, silver-haired bat, hoary bat, western red bat, American badger, and Yuma myotis. These species are discussed below:

Pallid Bat: Pallid bat (Antrozous pallidus) is a listed CDFW species of special concern. It favors roosting sites in crevices in rock outcrops, caves, hollow trees, abandoned mines, and human-made structures such as barns, attics, and sheds. Though pallid bats are gregarious, they tend to group in small colonies of 10 to 100 individuals. It is a nocturnal hunter and captures prey in flight, but unlike most American bats, the species has been observed foraging for flightless insects, which it seizes after landing.

This species may pass through the Project site but because typical habitat types do not occur in the Project site and suitable roosts are also absent, it is not expected to occur.

Silver-Haired Bat: Silver-haired bat (Lasionycteris noctivagans) is a listed CDFW special animal. Primarily considered a coastal and montane forest species, the silver-haired bat roosts in abandoned woodpecker holes, under bark, and occasionally in rock crevices. This insectivore's favored foraging sites include open wooded areas near water features.

Suitable forest and riparian habitat do not occur on the Project site.

Hoary Bat: The hoary bat (Lasiurus cinereus) is a listed CDFW special animal. It is considered to be one of the most widespread of all American bats with a range extending from Canada to central Chile, Argentina, and Hawaii. Hoary bats prefer older large leaf species such as cottonwoods, willows, and fruit or nut trees for daytime roosts. The species is primarily crepuscular or nocturnal and requires open areas to hunt its main prey item, moths. The hoary bat is considered a forest/woodland species, and in California they are often associated with undisturbed riparian or stream corridors.

Suitable forest habitat does not occur on the Project site.

Western Red Bat: The western red bat (Lasiurus cinereus) is a listed CDFW species of special concern. This species typically prefers edges that have trees for roosting as well as open areas. This species on a multitude of insects and roosts primarily in trees and sometimes in shrubs, but less often.

This species may pass through the Project site but because typical habitat types do not occur in the Project site and suitable roosts are also absent, it is not expected to occur.

American Badger: American badger (Taxidea taxus) is a listed CDFW species of special concern. This burrowing carnivorous mammal is solitary and very territorial preferring to feed on small mammals, lizards, snakes, insects, and carrion. It has no known natural enemies and inhabits dry, open fields, grasslands, and pastures.

Suitable habitat does not occur in the Project site and the Project site is regularly cultivated and disturbed in association with farming activities.

Yuma Myotis: The Yuma myotis (Myotis yumanensis) is a listed CDFW special animal. This bat species ranges from juniper and riparian woodlands to the desert near open water sources.

This species may pass through the Project site but because typical habitat types do not occur in the Project site and suitable roosts are also absent, it is not expected to occur.

Conclusion: The Project site does not provide the necessary habitat to support these special-status mammals. This is a less-than-significant impact. (Draft EIR, pp. 3.4-38 through 3.4-39)

5. Riparian Habitat or a Sensitive Natural Community

Threshold: Would implementation of the Project not result in direct or indirect adverse effects on riparian habitat or a sensitive natural community?

Findings: No Impact. (Draft EIR, page 3.4-41.)

Explanation: The CNDDB record search revealed documented occurrences of three sensitive habitats, Northern Claypan Vernal Pool, Valley Needlegrass Grassland, and Coastal and Valley Freshwater Marsh, within the nine-quad region for the Project site. This sensitive habitat does not occur within the Project site. Implementation of the Project would have no impact on riparian habitats or natural communities. (Draft EIR, page 3.4-41)

6. Native Fish or Wildlife Species

Threshold: Would implementation of the Project not result in interference with the movement of native fish or wildlife species or with established wildlife corridors, or impede the use of native wildlife nursery sites?

Findings: No Impact. (Draft EIR, page 3.4-42.)

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

The CNDDB record search did not reveal any documented wildlife corridors or wildlife nursery sites on or adjacent to the Project site. The Project site is located within an agricultural area that is surrounded by agricultural fields, industrial areas, and streets/I-80. Although wildlife may disperse through the Project site on a local level, the Project site is not considered a wildlife migration or movement corridor. Implementation of the Project will have no impact relative to this issue. (Draft EIR, page 3.4-42)

7. Tree Preservation Policy

Threshold: Would implementation of the Project not result in conflicts with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Findings: Less than Significant Impact. (Draft EIR, pp. 3.4-42 through 3.4-45.)

Explanation: The City of Dixon does not have a tree preservation policy or ordinance, and the NEQSP does not specify thresholds for tree protection. The site does not contain any trees.

The Natural Environment Element of the General Plan establishes numerous policies related to biological resources as listed below:

NATURAL ENVIRONMENT ELEMENT POLICIES

Policy NE-1.1 Preserve the natural open space and agricultural lands that surround Dixon through continued leadership in cross-jurisdictional conservation initiatives such as the Vacaville-Dixon Greenbelt and the Davis-Dixon greenbelt.

- Consistent: As discussed previously, the Project site is in an agricultural setting and was used to cultivate various row crops. Aerial imagery of the Project site indicates row crops have been cultivated on the site for at least the past thirty-five years. The site was anticipated for development of Campus Mixed Use uses as part of the City's General Plan (adopted in 2021) as well as the NQESP (adopted in 1995). The project 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 General Plan EIR anticipated development of the Project site as part of the overall evaluation of the buildout of the City.

Policy NE-1.2 Support regional efforts to place additional land under permanent conservation easements and continue to use the Agricultural Land Mitigation Fund to collect development impact fees for the purpose of funding greenbelt expansion.

- Consistent: As discussed previously, the Project 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 Project would assist the City in achieving the intent of this policy.

Policy NE-1.3 Encourage open space preservation through easements, open space designation, or dedication of lands for the purpose of connecting conservation areas, protecting biodiversity, accommodating wildlife movement, and sustaining ecosystems.

- Consistent: As discussed previously, the Project 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 Project would assist the City in achieving the intent of this policy.

Policy NE-1.4 Prior to annexing land into the city or expanding the SOI, continue to require agricultural mitigation consistent with the Solano County Local Agency Formation Commission's Standards and Procedures when agricultural lands would be converted to nonagricultural purposes.

- Does Not Apply. The Project is already located within the City, and does not require expanding the SOI.

Policy NE-1.5 Continue to allow agriculture as an interim use on land within the City that is designated for future urban use.

- Consistent: As discussed previously, the Project site is in an agricultural setting and was used to cultivate various row crops. Aerial imagery of the Project site indicates row crops have been cultivated on the site for at least the past thirty-five years. The site was anticipated for development of Campus Mixed Use uses as part of the City's General Plan (adopted in 2021) as well as the NQESP (adopted in 1995). The project 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 General Plan EIR anticipated development of the Project site as part of the overall evaluation of the buildout of the City. The General Plan EIR determined that impacts associated with the conversion and loss of Important Farmland would be less than significant.

Policy NE-1.9 Facilitate groundwater recharge in Dixon by encouraging development projects to use Low Impact Development (LID) practices such as bioretention, porous paving, and green roofs, and by encouraging private property owners to design or retrofit landscaped or impervious areas to better capture storm water runoff.

- Consistent. This issue is addressed in Section 3.10 (Hydrology and Water Quality) of the Draft EIR. Impacts associated with groundwater depletion, interference with groundwater recharge, and conflicts with groundwater management plans were determined to be less than significant.

Policy NE-1.11 Support regional habitat conservation efforts, including implementation of the Solano Countywide Multispecies Habitat Conservation Plan.

- Consistent. This issue is addressed in Impact 3.4-11 of this section of the Draft EIR. As noted, the Solano HCP is currently in the draft stages and is not a final document or plan as of December 2023. If the Solano HCP becomes final prior to Project initiation, the Project proponent may apply for coverage under the Solano HCP. The Solano HCP establishes a framework for complying with State and Federal endangered species regulations while accommodating future urban growth, development of infrastructure, and ongoing operations and maintenance activities associated with flood control, irrigation facilities, and other public infrastructure undertaken by or under the permitting authority/control of the Plan Participants within Solano County. Implementation of Mitigation Measures 3.4-5 requires that, should the Solano HCP be adopted prior to initiation of any ground disturbing activities for any phase of development associated with the project, the Project shall be developed in accordance with the Solano HCP and the Programmatic Endangered Species Act Consultation issued by the U.S. Fish and Wildlife Service.

Policy NE-1.12 Ensure that adverse impacts on sensitive biological resources, including special-status species, sensitive natural communities, sensitive habitat, and wetlands are avoided or mitigate to the greatest extent feasible as development takes place.

- Consistent. Section 3.4, Biological Resources, analyzes impacts related to including special-status species, sensitive natural communities, sensitive habitat, and wetlands. This section includes mitigation measures to reduce the potential impacts to special-status birds and ditches which are considered potential jurisdictional aquatic resources ("waters of the United States") to a less-than-significant level. Although the Project would involve development of land currently used for agricultural purposes, the Project site is designated Campus Mixed Use uses by the General Plan and NEQSP, and development of the site with mixed uses has been anticipated by the General Plan and NEQSP.

Policy NE-1.13 In areas where development (including trails or other improvements) has the potential for adverse effects on special-status species, require project proponents to submit a study conducted by a qualified professional that identifies the presence or absence of special-status species at the proposed development site. If special-status species are determined by the City to be present, require incorporation of appropriate mitigation measures as part of the proposed development prior to final approval.

- Consistent. As noted previously, a Biological Resources Assessment (Helix Environmental Planning, 2023) (see Appendix D of this EIR) was completed for the project. The Assessment was conducted by a qualified professional and identifies the presence or absence of special-status species at the proposed development. The recommendations of the Assessment are included as mitigation measures in this section.

Policy NE-1.14 Protect the nests of raptors and other birds when in active use, as required by State and federal regulations. In new development, avoid disturbance to and loss of bird nests in active use by scheduling vegetation removal and new construction during the non-nesting season or by conducting a pre-construction survey by a qualified biologist to confirm nests are absent or to define appropriate buffers until any young have successfully fledged the nest.

- Consistent. Section 3.4, Biological Resources, includes mitigation measures to reduce the potential impacts to special-status birds (including raptors and other birds) to a less-than-significant level. The measures include avoidance and minimization measures as well as preconstruction surveys.

Policy NE-1.15 Recognize the importance of the urban forest to the natural environment in Dixon and expand the tree canopy on public and private property throughout the community.

- Does Not Apply. There are no trees located on-site. Future development of the site would include landscaping (street trees, etc.).
- Policy NE-1.17 Minimize removal of, and damage to, trees due to construction-related activities and continue to require replacement of trees, including street trees lost to new development.
- Does Not Apply. There are no trees located on-site.
- Policy NE-1.18 Require new development to provide and maintain street trees suitable to local climatic conditions.
- Consistent. As noted previously, there are no trees located on-site. Future development of the site would include landscaping (street trees, etc.).

The Project would not result in conflicts with local policies or ordinances protecting biological resources, and the impact would be less than significant. (Draft EIR, pp. 3.4-42 through 3.4-45)

E. ENERGY

1. Wasteful, Inefficient, or Unnecessary Consumption of Energy

Threshold: Would Project implementation not result in the inefficient, wasteful, or unnecessary use of energy resources?

Findings: Less-than-significant impact. (Draft EIR, pp. 3.6-12 through 3.6-15.)

Explanation: overall energy consumption, decreasing reliance on natural gas and oil, and increasing reliance on renewable energy sources. In particular, the Project would be considered "wasteful, inefficient, and unnecessary" if it were to violate State and federal energy standards and/or result in significant adverse impacts related to Project energy requirements, energy inefficiencies, energy intensiveness of materials, effects on local and regional energy supplies or on requirements for additional capacity, compliance with existing energy standards, effects on energy resources, or transportation energy use requirements. In addition, the project could have a significant energy impact if it would conflict or create an inconsistency with an applicable plan, policy, or regulation for renewable energy or energy efficiency.

The Project includes various characteristics that reduce the inefficient, wasteful, or unnecessary use of energy. Overall, a wide variety of additional Project features would be implemented that would substantially reduce energy emissions. For example, beyond simply complying with State requirements such as the energy efficiency requirements of the latest version of the California Title 24 Energy Efficiency Standards, the Project would exceed the Title 24 Building Envelope Energy Efficiency Standards by at least 1 percent and all appliances to be installed will meet or exceed Title 24 requirements. The Project is also anticipated to produce approximately solar photovoltaic (PV) for on-site use, consistent with the requirements of Title 24.

Moreover, it should be noted that, over time, electrification of the vehicles will increase due to state requirements, and state and national trends. Electric charging infrastructure would be installed on the property to facilitate the conversion of the truck fleet to zero-emission electric trucks as they become available in the market and used for truck deliveries to and from the facility.

The amount of energy used by the Project during operation would include the amount of energy used by Project buildings and outdoor lighting, and the fuel used by vehicle trips generated during Project construction and operation, fuel used by off-road construction vehicles during construction activities, and fuel used by project maintenance activities during project operation. The following discussion provides a detailed calculation of energy usage expected for the Project, as provided by applicable modelling software (i.e., CalEEMod v2022.1) and the CARB EMFAC2021). Additional assumptions and calculations are provided within Appendix B of this EIR.

Electricity and natural gas used by the Project would be used primarily to generate energy for project buildings, as well as for outdoor parking lot lighting. As shown in further detail in the CalEEMod modeling outputs provided in Appendix B, "Energy" is one of the categories that was modeled for GHG emissions. As also shown in the CalEEMod modeling outputs as provided in Appendix B, the Project is anticipated to consume approximately 22,497,084 kWh of electricity per year and approximately 29,498,638 kBTU per of natural gas per year. Moreover, this is likely a conservative estimate, given that the CalEEMod model does not account for the latest version of Title 24. Furthermore, this also does not

account for the vast majority of the project's energy efficiency commitments, which would likely drive down the energy usage much further than identified herein.

The Project would generate vehicle trips (i.e., passenger vehicles for employees and heavy-duty trucks for hauling) during its operational phase. Compliance with applicable State laws and regulations would limit idling and a part of a comprehensive regulatory framework that is implemented by the CARB. A description of project operational on-road mobile energy usage is provided below.

According to the Traffic Impact Analysis for the Campus 257 NEQSP prepared for the Project (2023), and as described in more detail in Section 3.15 of this EIR, the Project would increase total vehicle trips by approximately 17,083 net new daily trips. In order to calculate operational on-road vehicle energy usage, De Novo Planning Group used fleet mix data from the CalEEMod (v.2022.1.1.21) output for the Project, and Year 2027 gasoline and diesel MPG (miles per gallon) factors for individual vehicle classes as provided by EMFAC2021, to derive weighted average gasoline and diesel MPG factors for the vehicle fleet as a whole. Based on these calculations, as provided in Appendix B, upon full buildout, the Project would generate operational vehicle trips that would use a total of approximately 4,067 gallons of gasoline and 793 gallons of diesel per day, or 1,484,562 gallons of gasoline and 289,281 gallons of diesel per year.

The Project's buildings would be designed and constructed in accordance with the City's latest adopted energy efficiency standards, which are based on the State's Title 24 Energy Efficiency Standards for Nonresidential Buildings and Green Building Code Standards. Beyond simply complying with State requirements such as the energy efficiency requirements of the latest version of the California Title 24 Energy Efficiency Standards, consistent with Mitigation Measure 3.3-1 in Section 3.3 of the EIR, the project would exceed the Title 24 Building Envelope Energy Efficiency Standards by at least 1 percent and all appliances to be installed will meet or exceed Title 24 requirements. These standards include minimum energy efficiency requirements related to building envelope, mechanical systems (e.g., heating, ventilation, and air conditioning [HVAC] and water heating systems), and indoor and outdoor lighting, are widely regarded as the some of the most advanced and stringent building energy efficiency standards in the country. Moreover, as specified in Chapter 5, Part 11 of the Title 24 standards, the Project would be required to incorporate electrical conduit to facilitate future installation of EV charging infrastructure. In addition, as specified in Subchapter 6, Part 6 of the Title 24 standards, the Project would be required to design the proposed buildings to structurally accommodate future installation of a rooftop solar PV system. As such, the design of the Project would facilitate the future commitment to renewable energy resources. Therefore, building energy consumption would not be considered wasteful, inefficient, or unnecessary.

The Project would also generate on-road vehicle trips during project construction (from construction workers and vendors travelling to and from the project site). De Novo Planning Group estimated the vehicle fuel consumed during these trips based on the assumed construction schedule, vehicle trip lengths and number of workers per construction phase as provided by CalEEMod, and Year 2025 gasoline and diesel MPG factors provided by EMFAC2021 (year 2025 factors were used to represent a conservative analysis, as the energy efficiency of construction activities is anticipated to improve over time). For the sake of simplicity and to be conservative, it was assumed that all construction worker light duty passenger cars and truck trips use gasoline as a fuel source, and all medium and heavy-duty vendor trucks use diesel fuel. Table 3.6-2, below, describes gasoline and diesel fuel consumed during each construction phase (in aggregate). As shown, the vast majority of on-road mobile vehicle fuel used during the construction of the Project would occur during the building construction phase. See Appendix B.2 of this EIR for a detailed accounting of construction on-road vehicle fuel usage estimates.

Off-road construction equipment would use diesel fuel during the construction phase of the Project. A non-exhaustive list of off-road constructive equipment expected to be used during the construction phase of the Project includes: forklifts, generator sets, tractors, excavators, and dozers. Based on the total amount

of CO2 emissions expected to be generated by the Project (as provided by the CalEEMod output), and standard conversion factors (as provided by the U.S. Energy Information Administration), the Project could use a total of approximately 87,693 gallons of diesel fuel for off-road construction equipment. Detailed calculations are provided in Appendix B.

State laws and regulations would limit idling from both on-road and off-road diesel-powered equipment and are part of a comprehensive regulatory framework that is implemented by the CARB. Additionally, as a practical matter, it is reasonable to assume that the overall construction schedule and process would be designed to be as efficient as feasible in order to avoid excess monetary costs. For example, equipment and fuel are not typically used wastefully due to the added expense associated with renting the equipment, maintaining it, and fueling it. Therefore, the opportunities for further future efficiency gains during construction are limited. For the foregoing reasons, it is anticipated that the construction phase of the project would not result in wasteful, inefficient, and unnecessary consumption of energy.

The Project would use energy resources for the operation of project buildings (natural gas and electricity), outdoor lighting (electricity), on-road vehicle trips (e.g., gasoline and diesel fuel) generated by the Project, and off-road and on-road construction activities associated with the Project (e.g. diesel fuel). Each of these activities would require the use of energy resources. The Project would be responsible for conserving energy, through the mitigation measures provided throughout this EIR, as well as through the implementation of statewide and local measures.

The Project would comply with all applicable federal, State, and local regulations regulating energy usage. Other statewide measures, including those intended to improve the energy efficiency of the statewide passenger and heavy-duty truck vehicle fleet (e.g., the Pavley Bill and the Low Carbon Fuel Standard), would improve vehicle fuel economies, thereby conserving gasoline and diesel fuel. These energy savings would continue to accrue over time. Moreover, the Project would comply with the City's General Plan goals, objectives and policies related to energy conservation that are relevant to this analysis.

The Project would comply with all existing energy standards and would not be expected to result in significant adverse impacts on energy resources. For these reasons, the Project would not cause an inefficient, wasteful, or unnecessary use of energy resources nor cause a significant impact on any of the energy-related thresholds as described by the CEQA Guidelines. This is a less than significant impact. (Draft EIR, pp. 3.6-12 through 3.6-15.)

F. GEOLOGY AND SOILS

1. Seismic Events

Threshold: Would implementation of the Project not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking or seismic-related ground failure, including liquefaction?

Findings: Less-than-significant impact. (Draft EIR, pp. 3.7-9 through 3.7-10.)

Explanation: An earthquake of moderate to high magnitude generated within the Northern California region has the potential to cause considerable ground shaking at the Project site.

Strong ground shaking can result in liquefaction. While the Dixon General Plan identifies the Project site as having moderate liquefaction susceptibility, an engineering analyses performed as part of the Geotechnical Report concluded that the liquefiable layers at the Project site are too deep to cause bearing

capacity failure for shallow foundations and the capping effects will likely reduce the theoretical settlements to less than 0.5-inch.

The project proposes a mixed-use development consisting of residential and non-residential uses, as well as infrastructure improvements to serve the Project site and NEQSP area. Development would be required to comply with the provisions of the CBC, which includes design requirements to mitigate the effects of potential hazards associated with seismic ground shaking. Further, the project would be reviewed by the City for conformance with the Dixon General Plan, Municipal Code, and other regulations that address seismic safety issues and would be required to provide adequate mitigation for existing and potential hazards identified. With the implementation of the policies in the General Plan, as well as applicable State and City codes, potential impacts associated with a seismic event, including seismic ground shaking and liquefaction, would be less than significant. (Draft EIR, pp. 3.7-9 through 3.7-10.)

2. Soil Erosion or Loss of Top Soil

Threshold: Would implementation of the Project not result in substantial soil erosion or the loss of topsoil?

Findings: Less-than-significant impact. (Draft EIR, page 3.7-10.)

Explanation: Implementation of The Campus project would provide for development and associated improvements that would involve some land clearing, mass grading, and other ground-disturbing activities that could temporarily increase soil erosion rates during and shortly after project construction. Construction-related erosion could result in the loss of a substantial amount of nonrenewable topsoil and could adversely affect water quality in nearby surface waters.

The project would be evaluated for conformance with the CBSC, Dixon General Plan, Municipal Code, and other regulations that address construction activities and soil erosion. Each phase of project construction disturbing one acre or more of soil would be required to obtain coverage under the Construction General Permit prior to issuance of a grading permit. The Construction General Permit requires development and implementation of a SWPPP and monitoring plan, which must include erosion-control and sediment-control BMPs that would meet or exceed measures required by the Construction General Permit to control stormwater quality degradation due to potential construction-related pollutants. Further, project construction would be required to implement construction site control BMPs in compliance with the City's NPDES Permit (MS4). Project construction activities would also be subject to the City's grading control ordinance, which controls land disturbances, landfill, soil storage, pollution, and erosion and sedimentation resulting from new development and redevelopment, and establishes procedures for the issuance, administration and enforcement of permits for such activities; and storm water control ordinance, which addresses City requirements for stormwater management and discharge control, including controlling erosion, sedimentation, and other pollutant runoff. With implementation of the policies in the General Plan, as well as applicable State and City requirements, potential impacts associated with erosion and loss of topsoil would be less than significant. (Draft EIR, page 3.7-10.)

3. Unstable Soils, Landslides, Lateral Spreading, Subsidence, liquefaction, or Collapse

Threshold: Would the Project result in a significant impact related to development on unstable geologic units or soil, or result in on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse?

Findings: Less-than-significant impact. (Draft EIR, page. 3.7-11)

Explanation: Landslide and Lateral Spreading: Based on topographic and lithologic data, the Geotechnical Report concludes that the risk of landslides and lateral spreading is considered low to negligible at the Project site.

Subsidence: Based on topographic and lithologic data, the Geotechnical Report concludes that the risk of subsidence is considered low to negligible at the Project site.

Liquefaction: Refer to Impact 3.7-1 regarding the potential for liquefaction.

Collapse: Collapsible soils occur predominantly where Holocene-age alluvial fan and wash sediments have been deposited during rapid run-off events. Examples of common problems associated with collapsible soils include tilting floors, cracking or separation in structures, sagging floors, and nonfunctional windows and doors. Existing alluvium within the Project site and surrounding area may be susceptible to collapse and excessive settlements, which could create the risk of hydroconsolidation if these soils were exposed to excessive moisture.

Conclusion: The Project site has a low to negligible potential for landslide, lateral spreading, subsidence, and liquefaction. Soils in the Project site could be susceptible to collapse or excessive settlement, causing structural damage. Structures and infrastructure improvements associated with The Campus Project would be evaluated for conformance with the CBSC, the Dixon General Plan, the Municipal Code, and other regulations. In addition, the Geotechnical Report includes recommendations for design and development of The Campus project that would ensure impacts from problematic soils are minimized. Implementation of CBSC and the Municipal Code requirements related to seismic and geologic conditions, as well as compliance with General Plan policies, would ensure that future development projects are evaluated for potential geologic and seismic risks and that potential risks are adequately addressed. Compliance with applicable State and City regulations would reduce potential impacts associated with unstable geologic and soil conditions to less than significant. (Draft EIR, page. 3.7-11)

4. Expansive Soils

Threshold: Would implementation of the Project not be located on expansive soil, as defined in Tables 18-1-D of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property. ?

Findings: Less-than-significant impact. (Draft EIR, pp. 3.7-11 through 3.7-12.)

Explanation: Expansive soils may swell considerably when wetted and shrink when dried. Expansive soils can be hazardous to structures and may cause cracks in building foundations, distortion of structural elements, and warping of doors and windows. Structural damage, such as warping and cracking of improvements, and rupture of underground utility lines, may occur if the expansive potential of soils is not considered during the design and construction of all improvements. The Geotechnical Report concludes that Project site soil exhibits low to very high shrink/swell potential with variations in moisture content.

Structures and infrastructure improvements associated with The Campus Project would be evaluated for conformance with the CBSC, the Dixon General Plan, the Municipal Code, and other regulations. In addition, the Geotechnical Report includes recommendations for design and development of The Campus project that would ensure impacts from problematic soils are minimized. Implementation of CBSC and the Municipal Code requirements related to seismic and geologic conditions, as well as compliance with General Plan policies, would ensure that future development projects are evaluated for potential geologic and seismic risks and that potential risks are adequately addressed. Compliance with

applicable State and City regulations would reduce potential impacts associated with expansive soils to less than significant. (Draft EIR, pp. 3.7-11 through 3.7-12.)

G. GREENHOUSE GAS EMISSIONS

1. Plan, Policy or Regulation Adopted for the Purpose of Reducing GHG Emissions

Threshold: Project implementation would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment and would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Findings: Less-than-significant impact. (Draft EIR, pp. 3.8-22 through 3.8-29.)

Explanation: Emissions of GHGs contributing to global climate change are attributable in large part to human activities associated with the industrial/manufacturing, utility, transportation, residential, and agricultural sectors. Therefore, the cumulative global emissions of GHGs contributing to global climate change can be attributed to every nation, region, and city, and virtually every individual on Earth. A project's GHG emissions are at a micro-scale relative to global emissions, but could result in a cumulatively considerable incremental contribution to a significant cumulative macro-scale impact. Implementation of the Project would contribute to increases of GHG emissions that are associated with global climate change. Estimated GHG emissions attributable to Project development would be primarily associated with increases of CO2 and other GHG pollutants, such as methane (CH4) and nitrous oxide (N2O), from mobile sources and utility usage.

The Project's short-term construction-related and long-term operational GHG emissions were estimated using the California Emission Estimator Model (CalEEMod)TM (v.2022.1.1.21). CalEEMod is a statewide model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify GHG emissions from land use projects. The model quantifies direct GHG emissions from construction and operation (including vehicle use), as well as indirect GHG emissions, such as GHG emissions from energy use, solid waste disposal, vegetation planting and/or removal, and water use. Emissions are expressed in annual metric tons of CO2 equivalent units of measure (i.e., MT CO2e), based on the global warming potential of the individual pollutants.

Estimated maximum GHG emissions associated with construction of the Project are summarized in Table 3.8-2. These emissions include all worker vehicle, vendor vehicle, hauler vehicle, and off-road construction vehicle GHG emissions. For the purposes of this analysis, based on input from the Project applicant, the Project is assumed to commence construction in 2025 and finish in 2027. The construction schedule was provided by the Project applicant. See Appendix B of this EIR for further detail. As presented in the table, short-term construction emissions of GHGs are estimated to be a total of approximately 4,331 MT CO2e.

The operational GHG emissions estimate for the Project includes on-site area, energy, mobile, waste, and water emissions. Estimated GHG emissions associated with operation of the Project are summarized in Table 3.8-3. It should be noted that CalEEMod does not account for Governor Newsom's Zero-Emission by 2035 Executive Order (N-79-20), which requires that all new cars and passenger trucks sold in California be zero-emission vehicles by 2035; CalEEMod also does not account for the new CARB rules related to truck electrification (e.g. Advanced Clean Trucks Regulation). The new Executive Order and CARB rules are anticipated to substantially reduce the operational emissions (i.e., mobile emissions) associated with passenger vehicles and freight trucks over time. The operational emissions results provided in Table 3.8-3 are likely an overestimate for mobile emissions, given the state's ongoing effort to increase

electric vehicles and trucks. As shown in the following table, the annual GHG emissions associated with the Project would be approximately 24,417 MT CO2e.

The CARB's 2022 Scoping Plan (the latest version of the Scoping Plan) provides policies that are considered needed to meet the State's mid-term and long-term GHG emissions reduction targets. Specifically, the CARB's 2022 Scoping Plan identifies that it "...lays out the sector-by-sector roadmap for California, the world's fifth largest economy, to achieve carbon neutrality by 2045 or earlier...". The Scoping Plan addresses recent legislation and direction from Governor Newsom, by extending and expanding upon the earlier Scoping Plans with a target of reducing anthropogenic emissions to 85 percent below 1990 levels by 2045, and adding carbon neutrality as a science-based guide and touchstone for California's climate work. The Scoping Plan is therefore consistent with the AB 1279 GHG reduction targets of achieving carbon neutrality by 2045, and reducing anthropogenic emissions to 85 percent below 1990 levels by 2045. The Project's consistency with the applicable 2022 Scoping Plan policies is discussed in Table 3.8-4.

In addition to Project commitments discussed in Table 3.8-4, the Project's operational emissions would be reduced as regulations are implemented by the CARB and other State agencies to comply with the statewide GHG reduction targets. Many of these regulations are already identified in the 2022 Scoping Plan. These statewide actions are anticipated to reduce operational GHG emissions even further below those identified in Table 3.8-2 and Table 3.8-3. For example, the Project's transportation emissions would be expected to decline as vehicle efficiency standards are implemented beyond the Advanced Clean Cars II program and the Low Carbon Fuel Standard is strengthened. Furthermore, CalEEMod does not account for Governor Newsom's Zero-Emission by 2035 Executive Order (N-79-20) or CARB's subsequent regulations, which requires that all new cars and passenger trucks sold in California be zero-emission vehicles by 2035 and that heavy duty truck emissions be reduced by greater truck electrification. These programs are anticipated to substantially reduce the operational emissions (i.e., mobile emissions) associated with passenger vehicles and freight trucks further, over time.

Overall, the Project would not conflict with the 2022 Scoping Plan. The Project incorporates a wide array of construction- and operation-related Project features that reduce Project emissions. Therefore, the Project would be considered consistent with the 2022 Scoping Plan. Since the Project would be consistent with the CARB's 2022 Scoping Plan, buildout of the Project would not interfere with the main programs the CARB has identified to support its conclusions that the State is on a trajectory to meet the 2045 GHG target. Overall, the Project would not impede the 2022 Scoping Plan and would help the State to progress towards this target.

The MTC's Plan Bay Area 2050 is a 30-year plan that includes eleven strategy categories for housing, economy, transportation, and environment. These strategies include similar measures to the 2022 Scoping Plan, such as supporting energy efficiency. The Project's consistency with the applicable Plan Bay Area 2050 strategy categories is discussed in Table 3.8-5. As shown in Table 3.8-5, the Project would not conflict with any of the GHG emissions reduction strategies contained in the MTC's Plan Bay Area 2050. Therefore, the Project is considered to be consistent with MTC's Plan Bay Area 2050.

The Executive Order S-3-05 2050 target has not been codified by legislation. However, studies have shown that, in order to meet the 2050 target, aggressive pursuit of technologies in the transportation and energy sectors, including electrification and the decarbonization of fuel, will be required. Because of the technological shifts required and the unknown parameters of the regulatory framework in 2050, quantitatively analyzing the Project's impacts further relative to the 2050 goal is speculative for purposes of CEQA.

The CARB recognizes that AB 32 establishes an emissions reduction trajectory that will allow California to achieve the more stringent 2050 target: "These [greenhouse gas emission reduction] measures also put the State on a path to meet the long-term 2050 goal of reducing California's GHG emissions to 80 percent below 1990 levels. This trajectory is consistent with the reductions that are needed globally to stabilize the climate." In addition, the CARB's First Update to the Scoping Plan "lays the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050," and many of the emission reduction strategies recommended by the CARB would serve to reduce the Project's post-2020 emissions level to the extent applicable by law:

- Energy Sector: Continued improvements in California's appliance and building energy efficiency programs and initiatives, such as the State's zero net energy building goals, would serve to reduce the Project's emissions level. Additionally, further additions to California's renewable resource portfolio would favorably influence the Project's emissions level.
- Transportation Sector: Anticipated deployment of improved vehicle efficiency, zero-emission technologies, lower carbon fuels, and improvement of existing transportation systems all will serve to reduce the Project's emissions level.
- Water Sector: The Project's emissions level will be reduced as a result of further utilization of water conservation technologies.
- Waste Management Sector: Plans to further improve recycling, reuse and reduction of solid waste will beneficially reduce the Project's emissions level.
- In his January 2015 inaugural address, Governor Brown expressed a commitment to achieve "three ambitious goals" that he wanted to see accomplished by 2030 to reduce the State's GHG emissions:
    - Increasing the State's Renewable Portfolio Standard from 33 percent in 2020 to 50 percent in 2030;
    - Cutting the petroleum use in cars and trucks in half; and
    - Doubling the efficiency of existing buildings and making heating fuels cleaner.

These expressions of executive branch policy may be manifested in adopted legislative or regulatory action through the State agencies and departments responsible for achieving the State's environmental policy objectives, particularly those relating to global climate change.

Further, studies show that the State's existing and proposed regulatory framework will allow the State to reduce its GHG emissions level to 40 percent below 1990 levels by 2030, and to 80 percent below 1990 levels by 2050. Even though these studies did not provide an exact regulatory and technological roadmap to achieve the 2030 and 2050 goals, they demonstrated that various combinations of policies could allow the Statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies and other regulations not analyzed in the studies could allow the State to meet the 2050 target.

Given the proportional contribution of mobile source-related GHG emissions to the State's inventory, recent studies also show that relatively new trends—such as the increasing importance of web-based shopping, the emergence of different driving patterns, and the increasing effect of web-based applications on transportation choices—are beginning to substantially influence transportation choices and the energy used by transportation modes. These factors have changed the direction of transportation trends in recent years and will require the creation of new models to effectively analyze future transportation patterns and the corresponding effect on GHG emissions. For the reasons described above, the Project's post-2020 emissions trajectory is expected to follow a declining trend, consistent with the 2030 and 2050 targets.

The City has also explored and considered additional potential mitigation measures including some of the

mitigation measures expressed during the public comments on the Draft EIR (in italics), followed by a response/finding)

Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to the following:

- *Promote transit-active transportation coordinated strategies*
  - This sort of mitigation is found to be largely outside the scope of the Project. As explained in the EIR: "The area in the project vicinity is served by the 'Readi-Ride' Transit service, a public dial-a-ride service provided within the city limits. Service is scheduled on a reservation, space-available basis. … Regional bus service is provided by Solano Transit (SolTrans), a Joint Powers Authority agency governed by representatives from Solano County and the cities of Benicia and Vallejo (not Dixon), and offers only one stop within Dixon, at the "Dixon Park and Ride located at Pitt School Road and Market Lane." (DEIR, p. 3.15-4.) However, future employers at the Project site will be required to implement a voluntary employee trip reduction program; identify a carpool coordinator; include preferential carpool parking; provide incentives as feasible for employees who walk, ride bicycles, and take transit to work more than half of the time; ensure the availability of secure bicycle storage onsite; and allow for remote work where applicable, pursuant to Mitigation Measure 3.15-2. (FEIR, p. 2-26, 2-37.)

- *Increase bicycle carrying capacity on transit and rail vehicles;*
  - This is found to be outside the scope of the Project

- *Improve or increase access to transit;*
  - The Project will improve access to transit through "mixed-use, walkable, transit-oriented, and compact infill development," including installation of offsite bicycle facilities and multi-use paths. (DEIR, pp. 2-6, 3.8-24-25, 3.11-19, 3.15-20.) The Project also will include a "park system that would connect the central portion of the Project site to the Project's roadways and roadways adjacent to the Project site. (DEIR, p. 3.8-24-25.)

- *Increase access to common goods and services, such as groceries, schools, and day care;*
  - This is found to be outside the scope of the Project

- *Incorporate the neighborhood electric vehicle network;*
  - This is found to be outside the scope of the Project. The City of Dixon has not planned for or approved the use of neighborhood electric vehicle networks.

- *Orient the project toward transit, bicycle and pedestrian facilities;*
  - The Project will include "neighborhood design improvements such as pedestrian network improvements" and "mixed-use, walkable, transit-oriented, and compact infill development," as well as offsite bicycle facilities and multi-use paths to enhance connectivity within the Project and "to the numerous commercial and industrial uses currently under development to the west of the Project site." (DEIR, pp. 2-6, 3.8-24-25, 3.11-19, 3.15-20.)

- Improve pedestrian or bicycle networks, or transit service;
  - See above.

- *Provide traffic calming measures*;

- The Project will include traffic calming measures, such as pedestrian and bicycle facilities (see above). (DEIR, pp. 3.8-24-25; FEIR, p. 3-181.)

- *Provide bicycle parking;*
  - Mitigation Measure 3.15-2 will require that future employers at the Project site install secure bicycle storage. Additionally, all single-family homes will have garages that can store bicycles, and bicycle parking will be provided in the multi-family residential and park areas pursuant to City design guidelines. (DEIR, p. 3.1-7.)

- *Limit or eliminate park supply;*
  - Mitigation Measure 3.15-2 will require that future employers at the Project site include preferential carpool parking; promote voluntary employee trip reductions; identify a carpool coordinator; provide incentives as feasible for employees who walk, ride bicycles, and take transit to work more than half of the time; ensure the availability of secure bicycle storage onsite; and allow remote work where applicable. Additional overly burdensome constraints on onsite parking are infeasible given the limited nature of transit in the vicinity of the Project and local and regional reliance on personal vehicles. (DEIR, p. 3.15-4.)]

- *Unbundle parking costs;*
  - Not applicable; although Mitigation Measure 3.15-2 will require that future employers at the Project site promote voluntary employee trip reductions and provide incentives as feasible for employees who walk, ride bicycles, and take transit to work more than half of the time.

- *Provide parking cash-out programs;*
  - Mitigation Measure 3.15-2 will require that future employers at the Project site provide incentives as feasible for employees who walk, ride bicycles, or take transit to work.

- *Implement or provide access to a commute reduction program.*
  - Mitigation Measure 3.15-2 will help reduce commuter miles. Future employers at the Project site will be required to include preferential carpool parking; promote voluntary employee trip reductions; identify a carpool coordinator; provide incentives as feasible for employees who walk, ride bicycles, and take transit to work more than half of the time; ensure the availability of secure bicycle storage onsite; and allow remote work where applicable

- *Incorporate bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; and planning for and building local bicycle projects that connect with the regional network.*
  - See above regarding on- and offsite pedestrian and bicycle facilities and walking/riding/transit incentives included as part of the Project and by Mitigation Measure 3.15-2.

- *Improving transit access to rail and bus routes by incentives for construction and transit facilities within developments, and/or providing dedicated shuttle service to transit stations.*
  - This is found to be mostly outside the scope of the Project. The existing transit system is a reservation-based system that operates similar to a shuttle. (DEIR, p. 3.15-4.) Mitigation Measure 3.15-2 will require that future employers at the Project site implement a voluntary employee trip reduction program and identify a carpool

coordinator, as well as provide preferential parking for carpool vehicles. Additionally, the Project's fair share contributions to regional circulation and development fees could and may be utilized by the City for transit improvements. (DEIR, p. 3.8-27, 3.15-29, 3.16-19.)

- *Designate a percentage of parking spaces for ride-sharing vehicles or high occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles.*
  - Mitigation Measure 3.15-2 requires that future employers at the Project site include preferential carpool parking.

- *Require at least five percent of all vehicle parking spaces include electric vehicle charging stations, or at a minimum, require the appropriate infrastructure to facilitate sufficient electric charging for passenger vehicles and trucks to plug-in.*
  - Electric vehicle charging infrastructure will be installed to facilitate future conversion of any Project-related truck fleets "to zero-emission electric trucks as they become available in the market and used for truck deliveries to and from the facility." (DEIR, p. 3.6-12.) Electric vehicle parking and charging stations, and associated infrastructure, will be installed pursuant to California building standards, including California Green Building Standards and standards within the California Energy Code. (DEIR, pp. 3.8-15-16, 3.8-24, 4-5.)

- *Implement preferential parking permit program.*
  - See above on dedicated onsite carpool parking.

- *Implement school pool and bus programs.*
  - This is found to be outside the scope of the Project as no schools are proposed or located in the Project site and neither City nor Project regulate school bus programs.

- *Encourage telecommuting and alternative work schedules,*
  - Mitigation Measure 3.15-2 will require that future employers at the Project site allow for remote work for applicable employees for one or more days per week (or equivalent hours). Notably also, there is a high likelihood that a substantial portion of future Project residents will work remotely from home, as is common now in California. A recent survey presented by the Public Policy Institute of California found that 17% of California workers reported they worked from home, with 25% of U.S. workers reporting a hybrid work schedule (working partially from home). (See https://www.ppic.org/blog/remote-work-is-reshaping-the-california-labor-market/; see also https://advocacy.calchamber.com/2024/08/01/how-remote-work-is-changing-californias-workforce/.) This likelihood is not factored into any modeling or analysis performed for the Project but would lower residential vehicle miles traveled (VMT) and associated GHG emissions below levels assumed in the EIR.

- *Staggered starting times, Flexible schedules; and Compressed work weeks.*
  - See above.

- *Implement commute trip reduction marketing,*
  - See above. Also, Mitigation Measure 3.15-2 will require that future employers at the Project site implement a voluntary employee trip reduction program and identify a carpool coordinator. Mitigation Measures 3.15-2 also will require installation of preferential carpool parking spots, incentives as feasible for employees who choose non-

driving commute options more than half the time, and secure bicycle storage. All of these requirements will help encourage a reduction in commuter miles.

- *New employee orientation of trip reduction and alternative mode options;*
  - See above.

- *Event promotions and Publications*
  - See above.

- *Price workplace parking*
  - Pricing workplace parking is infeasible given the nature of the area, limited public transportation, and the local and area reliance on personal vehicles. Priced parking has a high potential to harmfully limit the quantity and quality of future onsite employees. However, as explained above, Mitigation Measure 3.15-2 will require that future employers at the Project site implement a voluntary employee trip reduction program and identify a carpool coordinator. Mitigation Measures 3.15-2 also will require installation of preferential carpool parking spots, incentives as feasible for employees who choose non-driving commute options more than half the time, and secure bicycle storage, as well as remote work options where applicable.

- *Explicitly charging for parking for its employees; Implementing above market rate pricing; Validating parking only for invited guests; Not providing employee parking and transportation allowances; and Educating employees about available alternatives.*
  - See above.

- *Adopting employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, providing end-of-trip facilities, and telecommuting programs.*
  - As explained above, Mitigation Measure 3.15-2 will require that future employers at the Project site implement a voluntary employee trip reduction program and identify a carpool coordinator. Mitigation Measures 3.15-2 also will require installation of preferential carpool parking spots, incentives as feasible for employees who choose non-driving commute options more than half the time, secure bicycle storage, and remote work options. See also note above on remote work in the Project's residential land uses and commensurate VMT and GHG-emission reductions.

- P*rovide car-sharing, bike sharing, and ridesharing programs; Provide transit passes; or Shift single occupancy vehicle trips to carpooling or vanpooling, for example providing ride-matching services;*
  - See above.

- *Provide incentives or subsidies that increase that use of modes other than single occupancy vehicle;*
  - See above.

- *Provide on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, and showers and locker rooms; Provide employee transportation coordinators at employment sites, or Provide a guaranteed ride home service to users of non-auto modes.*
  - See above.

- *Installing solar photovoltaic systems on the project site of a specified projected energy needs, including all electrical chargers.*
    - See above on the existing transit system. Solar photovoltaic will be installed onsite, and Project buildings, including solar-ready roofs, will be designed in accordance with California building standards, including California Green Building Standards and standards included within the California Energy Code. (DEIR, pp. 3.6-12, 3.16-14, 3.8-15-16, 3.8-24, 4-5.)

- *Designing all project building roofs to accommodate the maximum future coverage of solar panels and installing the maximum solar power generation capacity feasible.*
    - See above.

- *Oversizing electrical rooms by 25 percent or providing a secondary electrical room to accommodate future expansion of electric vehicle charging capability.*
    - See above.

- *Requiring all stand-by emergency generators to be powered by non-diesel fuel.*
    - Not applicable to the Project site. No emergency generators are included as a part of the Project.

- *Meeting CalGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking.*
    - The Project will comply with all state and local green building and energy/water efficiency requirements, as discussed above. (See also DEIR, p. 3.1-9.) Further, the Project will exceed required energy efficiency standards by at least 1 percent or greater, pursuant to Mitigation Measure 3.3-1(a). (DEIR, p. 3.3-23, 3.6-12.) See also above notes on onsite bicycle parking.

- *Designing to LEED green building certification standards.*
    - Inapplicable and infeasible. A recent study revealed that CalGreen standards outperform LEED standards in reducing building-related GHG emissions by as much as 21%. See https://bschool.pepperdine.edu/newsroom/articles/green-building-standards.htm; https://onlinelibrary.wiley.com/doi/10.1111/1540-6229.12515.) Moreover, obtaining LEED certification for Project buildings would be economically infeasible. Building to, and maintaining, LEED standards would significantly increase costs (e.g., increased architectural/engineering costs, increased construction costs, certification and monitoring fees). This increase in costs would considerably inhibit, or potentially prohibit, future site development by reducing profitability and would result in increased housing prices such that "ownership opportunities" may not be accessible by the "missing middle," in contravention of Project objectives. (DEIR, p. 2-2.)

The Project would be consistent with relevant plans, policies, and regulations associated with GHGs, notably the most recent version of the CARB's Scoping Plan, and the MTC's Plan Bay Area 2050. This would ensure that the Project would be consistent with, and would not impair, the State's carbon neutrality standard by year 2045 as established under AB 1279. The State is making progress toward reducing GHG emissions in key sectors such as transportation, industry, and electricity. Since the Project would be consistent with State GHG Plans, it would not impede the State's goals of reducing GHG emissions 40 percent below 1990 levels by 2030, and of achieving carbon neutrality by 2045. The Project would make a reasonable fair share contribution to the State's GHG reduction goals, by implementing an array of Project

features that would reduce GHG emissions, and therefore, the Project's GHG emissions would be considered to have a less than significant impact.

H. HAZARDS AND HAZARDOUS MATERIALS

1. Transport, Use, or Disposal of Hazardous Materials

Threshold: Would implementation of the Project not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Findings: Less-than-significant impact. (Draft EIR, pp. 3.9-18 through 3.9-20.)

Explanation: Generally, the exposure of persons to hazardous materials could occur in the following manners: 1) improper handling or use of hazardous materials or hazardous wastes during construction or operation of future development, particularly by untrained personnel; 2) an accident during transport; 3) environmentally unsound disposal methods; or 4) fire, explosion or other emergencies. The severity of potential effects varies with the activity conducted, the concentration and type of hazardous material or wastes present, and the proximity of sensitive receptors.

Construction activities associated with development of the Project may involve the routine transport, use, or disposal of hazardous materials, such as paints, sealants, lubricants, solvents, adhesives, cleaners, or petroleum-based fuels or hydraulic fluid used for construction equipment. The construction contractor would be required to use standard construction controls and safety procedures that would avoid and minimize the potential for hazards associated with the transport and use of hazardous materials. Standard construction practices would be observed such that any materials released are appropriately contained and remediated as required by local, State, and federal law. These activities would also be short-term and would cease upon completion of construction.

The use, storage, transport, and disposal of construction-related hazardous materials would be required to conform to existing laws and regulations. Compliance with applicable laws and regulations governing the use, storage, transportation, and disposal of hazardous materials would ensure all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts. For example, all spills or leakage of petroleum products during construction activities are required to be immediately contained, the hazardous material identified, and the material remediated in compliance with applicable State and local regulations for the cleanup and disposal of that contaminant. All contaminated waste would be required to be collected and disposed of at an appropriately licensed disposal or treatment facility. As such, impacts in this regard would be less than significant. The project proposes a mixed-use development consisting of a 48-acre Dixon Opportunity Center (DOC) area developed to accommodate technology, business park, and light industrial uses; approximately 144 acres of residential uses; and approximately 2.5 acres of commercial uses. While specific end users are unknown, the proposed DOC is envisioned to accommodate technology, business park, and light industrial uses, including light industrial, manufacturing, office, and research and development uses. Large and small scale industrial, manufacturing, office, research, heavy commercial uses, and other related uses could also be developed. Operation of the proposed mixed-use development would involve the use of small amounts of hazardous materials, such as cleansers, paints, fertilizers, and pesticides for cleaning and maintenance purposes. In addition, uses associated with the DOC area may involve the use, generation, storage, or transport of larger amounts of hazardous materials. Proposed uses would be subject to the hazardous materials programs overseen and implemented by the County CUPA. The CUPA routinely inspects and permits all hazardous waste generating businesses to ensure compliance with all applicable laws and regulations related to the use, storage, handling, transportation, treatment, and disposal of hazardous waste. Pursuant to the requirements established by the CUPA, any business locating to the DOC area that proposes

to handle hazardous materials at amounts above the established threshold would be required to prepare a Hazardous Materials Business Plan (HMBP). The HMBP must detail the quantity of such materials stored on the premises, spill prevention and control measures, and an emergency response plan to address potential incidents related to such materials such as a release, fire, and/or disaster. Additionally, facilities storing acutely hazardous materials meeting threshold quantities would be required to prepare a Risk Management Plan (RMP) in accordance with the California Accidental Release Prevention program, which includes: a hazard assessment that details the potential effects of an accidental release, an accident history of the last five years, and an evaluation of worst-case and alternative accidental releases; a prevention program that includes safety precautions and maintenance, monitoring, and employee training measures; and an emergency response program that details emergency health care, employee training measures and procedures for informing the public and response agencies should an accident occur.

The use, storage, transport, and disposal of hazardous materials would be governed by existing regulations of several agencies, including the DTSC, EPA, DOT, Cal OSHA, and the Solano County CUPA. Compliance with applicable laws and regulations governing the use, storage, transportation, and disposal of hazardous materials would ensure all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts. Therefore, long-term operation of the Project is not anticipated to result in substantial hazards to the public or the environment arising from the routine use, storage, transport, and disposal of hazardous materials; impacts in this regard would be less than significant. (Draft EIR, pp. 3.9-18 through 3.9-20.)

2. Release of Hazard Materials

Threshold: Would implementation of the Project not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Findings: Less-than-significant impact. (Draft EIR, pp. 3.9-20 through 3.9-22.)

Explanation: Construction activities associated with the Project could release hazardous materials into the environment through reasonably foreseeable upset and accident conditions. As discussed above in Impact 3.9-1, potentially hazardous materials with the potential of accidental release may be used during future construction activities associated with project implementation, including substances such as paints, sealants, lubricants, solvents, adhesives, cleaners, or petroleum-based fuels or hydraulic fluid used for construction equipment. The level of risk associated with the accidental release of hazardous substances is not considered significant due to the small volume and low concentration of hazardous materials utilized during construction. These activities would also be short-term and would cease upon completion of construction. Compliance with existing regulatory requirements would ensure construction workers and the general public are not exposed to significant risks related to hazardous materials during construction activities. Cal OSHA has regulations concerning the use of hazardous materials, including requirements for safety training, exposure warnings, availability of safety equipment, and preparation of emergency action/prevention plans. For example, all spills or leakage of petroleum products during construction activities are required to be immediately contained, the hazardous material identified, and the material remediated in compliance with applicable State and local regulations for the cleanup and disposal of that contaminant. All contaminated waste encountered would be required to be collected and disposed of at an appropriately licensed disposal or treatment facility.

Future construction activities could expose construction workers to accidental conditions as a result of existing potential contamination in on-site soils related to historical use of the Project site, including the former unpermitted landfill and 10,000-gallon diesel AST. The following analysis considers potential disturbance of hazardous materials on-site during construction.

Based on the Phase I ESA, a 2005 subsurface investigation in the area of a former 10,000-gallon diesel AST (associated with the former Mistler Farm facility, located within the northwestern portion of the Project site) identified diesel impact to soil and groundwater. Following remedial and monitoring activities, it was concluded that the limited remaining residual petroleum hydrocarbons in the subsurface attributable to historical releases from the AST did not represent a significant threat to human health or the environment. Therefore, impacts would be less than significant in this regard.

With regards to the onsite unpermitted landfill, a Site Investigation indicated that most or all of the landfilled materials may be characterized as a California hazardous waste for disposal purposes. Subsequently, wastes contained in the former abandoned landfill at the Project site were excavated and removed from the site for proper offsite disposal in accordance with the provisions of the approved Clean Closure Plan. The excavation was backfilled with clean soils. Observations and verification testing performed during the waste excavation work confirmed that all landfilled wastes were removed and that no soil contaminants remained. A post-excavation soil gas survey conducted as part of the Phase II ESA identified soil gas samples containing some of the tested VOCs at concentrations above the laboratory reporting limits. However, the vast majority of VOC detections were very low and below ESL values for both residential and commercial/industrial sites. Due to the presence of low levels of soil VOCs, a deed restriction was recorded for the Restricted Area of the former landfill site (southwestern corner of APN 0111-040-010 and the northwestern corner of APN 0111-040-040) in 2023. This deed restricted area is located in the northern half of the Project site along the western Project site boundary (see Plates 2 and 3 of the Phase I ESA). The deed restriction requires any contaminated soils which may be brought to the surface through grading activities to be managed in accordance with all applicable provisions of local, State, and federal law. A landscaped area and a dog park, which are allowable uses in the deed restricted area, are proposed. Compliance with standard construction practices and the existing regulatory requirements would reduce potential impacts in this regard to a level that is less than significant.

The project proposes a mixed-use development consisting of a 48-acre DOC area developed to accommodate technology, business park, and light industrial uses; approximately 144 acres of residential uses; and approximately 2.5 acres of commercial uses. While specific end users are unknown, the proposed DOC is envisioned to accommodate technology, business park, and light industrial uses, including light industrial, manufacturing, office, and research and development uses. Large and small scale industrial, manufacturing, office, research, heavy commercial uses, and other related uses could also be developed.

A deed restriction has been recorded for a portion of the Project site associated with the former landfill site (southwestern corner of APN 0111-040-010 and the northwestern corner of APN 0111-040-040). The project does not propose to develop structures within the Restricted Area, consistent with the deed restriction.

Operation of the proposed mixed-use development would involve the use of small amounts of hazardous materials, such as cleansers, paints, fertilizers, and pesticides for cleaning and maintenance purposes. In addition, uses associated with the DOC area may involve the use, generation, storage, or transport of larger amounts of hazardous materials. Proposed uses would be subject to federal, State, and local regulations, including the hazardous materials programs overseen and implemented by the County CUPA. The CUPA routinely inspects and permits all hazardous waste generating businesses to ensure compliance with all applicable laws and regulations related to the use, storage, handling, transportation, treatment, and disposal of hazardous waste. Compliance with applicable laws and regulations governing hazardous materials would ensure all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts. Thus, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment and this impact would be less than significant.(Draft EIR, pp. 3.9-20 through 3.9-22.)

3. Hazard to Public

Threshold: Would the Project result in development on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.58 and, as a result, create a significant hazard to the public or environment?

Findings: Less-than-significant impact. (Draft EIR, pp. 3.9-22 through 3.9-23)

Explanation: Government Code Section 65962.5, commonly referred to as the "Cortese List," requires the DTSC and the SWRCB to compile and update a regulatory sites list (pursuant to the criteria of the Section). The California Department of Health Services is also required to compile and update, as appropriate, a list of all public drinking water wells that contain detectable levels of organic contaminants and that are subject to water analysis pursuant to Health and Safety Code Section 116395. Government Code Section 65962.5 requires the local enforcement agency, as designated pursuant to Section 18051 of Title 14 of the California Code of Regulations, to compile, as appropriate, a list of all solid waste disposal facilities from which there is a known migration of hazardous waste.

According to the Phase I ESA, the Project site appears on regulatory agency listings, including the SWIS listing pertaining to the onsite unpermitted landfill and the LUST database, apparently related to the petroleum hydrocarbon case at the site attributable to a former 10,000-gallon diesel AST. With regards to the former 10,000-gallon diesel AST within the Project site, following remedial and monitoring activities that occurred, it was concluded that the limited remaining residual petroleum hydrocarbons in the subsurface attributable to historical releases from the AST did not represent a significant threat to human health or the environment. The Phase I ESA further indicates that data do not suggest that any listed sites within proximity to the Project site (up to a one-mile radii) pose a significant threat to the environmental integrity of the Project site and are therefore not anticipated to have caused a REC at the site.

With regards to the onsite unpermitted landfill, a Site Investigation indicated that most or all of the landfilled materials may be characterized as a California hazardous waste for disposal purposes. Due to the identified contaminant conditions and the open regulatory agency status, the Phase I ESA determined that the abandoned landfill at the Project site is considered a REC. Subsequently, wastes contained in the former abandoned landfill at the Project site were excavated and removed from the site for proper offsite disposal in accordance with the provisions of the approved Clean Closure Plan. The excavation was backfilled with clean soils. A Phase II ESA conducted a post-excavation soil gas survey to evaluate any residual VOCs in soil gas in the area of the removed landfill. The Phase II ESA indicates that post-excavation soil gas samples contained some of the tested VOCs at concentrations above the laboratory reporting limits. However, the vast majority of VOC detections were very low and below ESL values for both residential and commercial/industrial sites. A deed restriction was recorded for the Restricted Area of the former landfill site (southwestern corner of APN 0111-040-010 and the northwestern corner of APN 0111-040-040) in 2023. The deed restriction requires contaminated soils brought to the surface through grading activities to be managed in accordance with all applicable provisions of local, State, and federal law. The deed restriction further prevents the construction of any buildings on the Restricted Area, including residential uses, hospitals, schools, day-care centers, or industrial, commercial, or office uses.

Therefore, the Project's potential impact related to the creation of a hazard to the public or the environment as a result of being included on a list of hazardous materials sites would be less than significant. (Draft EIR, pp. 3.9-22 through 3.9-23)

4. Airport

Threshold: The Project would not be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, and implementation of the Project would not result in a safety hazard or excessive noise for people residing or working in the Project site?

Findings: Less-than-significant impact. (Draft EIR, page 3.9-23.)

Explanation: The Project site is not located within two miles of a public airport or public use airport. The Project site falls within Compatibility Zone E of the Airport Influence Area of the Travis AFB. According to the Travis AFB Land Use Compatibility Plan, Zone E requires ALUC review for all projects proposing structures over 200 feet in height above ground level. There is no limit on the types of land uses, densities, or intensities, although large stadiums and similar uses should be avoided in this compatibility zone. The Project site is located outside of the 60 dB CNEL noise contour of the Travis AFB. Therefore, future development projects accommodated through implementation of the Project would not result in excessive noise for residents or workers. Future development projects within the Project site would be reviewed for consistency with applicable standards established in the Travis AFB Land Use Compatibility Plan. Therefore, the project would not result in a safety hazard or excessive noise for people residing or working in the Project site; impacts would be less than significant.(Draft EIR, page 3.9-23.)

5. Emergency Evacuation Plan

Threshold: Would the Project impair the implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Findings: Less-than-significant impact. (Draft EIR, pp. 3.9-23 through 3.9-24.)

Explanation: The project proposes a mixed-use development that would include roadway modifications, including the construction of eastern and southern halves of the future four-lane arterial for Professional Drive; the extension of Professional Drive south along the west side of the roadway to provide a connection to existing Vaughn Road; and the widening of Pedrick Road from Professional Drive to Entrance 'A' roadway adjacent to the project frontage, resulting in improved safety conditions by construction of a dedicated southbound left turn lane into the Campbells facility, where none currently exists, thereby alleviating the current wait times for southbound vehicles stalled behind trucks waiting turn, as well as improved safety for northbound right turn movements into the Campbells facility by the northbound two-lane section that will allow right turn truck movements into the Campbells facility without blocking other northbound traffic. Development would be designed, constructed, and maintained in accordance with applicable standards, including vehicular access to ensure that adequate emergency access and evacuation would be maintained. Access for emergency vehicles would be required to be incorporated into project design. Construction activities that may temporarily restrict vehicular traffic would be required to implement appropriate measures to facilitate the passage of persons and vehicles through/around any required road closures.

The Project would not impair or physically interfere with an adopted emergency response plan or emergency evacuation plan. Fire and emergency services at the Project site are provided by the Dixon Fire Department. Development of the project would be required to comply with applicable City codes and regulations pertaining to emergency response and evacuation plans. Prior to construction, proposed site plans would be required to undergo review by the Dixon Fire Department to ensure that adequate emergency access would be maintained within the area. The Project would also be required to comply with all applicable codes and ordinances for emergency access, including resolving any deficiencies in access that

could preclude emergency evacuation or emergency response identified by the fire department. During project operation, the City and/or County EOP would be implemented and emergency response and evacuation would occur dependent upon the emergency situation, consistent with the respective EOPs. Therefore, the project would not impair implementation of or physically interfere an adopted emergency response plan or emergency evacuation plan; impacts would be less than significant. (Draft EIR, pp. 3.9-23 through 3.9-24.)

6. Significant risk of loss, injury, or death involving wildfires

Threshold: Implementation of the Project wound not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Findings: Less-than-significant impact. (Draft EIR, page 3.9-24.)

Explanation: The project proposes a mixed-use development consisting of a 48-acre DOC area developed to accommodate technology, business park, and light industrial uses; approximately 144 acres of residential uses; and approximately 2.5 acres of commercial uses. The Project site is located in an area that is predominately agricultural and industrial, which is not considered at a significant risk of wildlife. There are no steep slopes on or near the Project site. Development of the project would not exacerbate fire risks. Additionally, adjacent roadways and nearby urban development would effectively act as firebreaks for the site. Therefore, impacts from project implementation would be considered less than significant relative to exposure of people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. (Draft EIR, page 3.9-24.)

I. HYDROLOGY AND WATER QUALITY

1. Water Discharge

Threshold: Implementation of the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Findings: Less-than-significant impact. (Draft EIR, pp. 3.10-17 through 3.10-19.)

Explanation: Short-Term Construction Water Quality Impacts: Development associated with the Project would involve grading, excavation, removal of vegetation cover, and activities associated with construction activities that could temporarily increase runoff, erosion, and sedimentation. Construction activities also could result in soil compaction and wind erosion impacts that could adversely affect soils and reduce the revegetation potential at construction sites and staging areas.

Each phase of project construction disturbing one acre or more of soil would be required to obtain coverage under the Construction General Permit. The permit requires development and implementation of a SWPPP and monitoring plan, which must include erosion-control and sediment-control BMPs that would meet or exceed measures required by the Construction General Permit to control stormwater quality degradation due to potential construction-related pollutants. Further, project construction would be required to implement construction site control BMPs in compliance with the City's NPDES Permit (MS4). Project construction activities would also be subject to the City's grading control ordinance and storm water control ordinance, which requires compliance with minimum BMPs to reduce the discharge of pollutants. Therefore, the Project would not violate any water quality standards or waste discharge requirements, nor would it otherwise substantially degrade surface water or groundwater quality. Implementation of BMPs during construction activities and compliance with the existing regulatory requirements would reduce potential impacts in this regard to a level that is less than significant.

Long-Term Operational Water Quality Impacts: The long-term operations of the Project could result in impacts to surface water quality from urban stormwater runoff. The Project would result in new impervious areas associated with streets, driveways, parking lots, and buildings. Normal activities in these developed areas include the use of various automotive petroleum products and household hazardous materials, including cleansers, paints, fertilizers, and pesticides. Within urban areas, these pollutants are generally referred to as non-point source pollutants. While non-point source pollutants from the Project site already exist due to road and agricultural runoff, the proposed mixed-use development project could increase potential pollutants relative to existing conditions. The pollutant levels would vary based on factors such as time between storm events, volume of storm event, type of land uses, and density of people. In addition, uses associated with the proposed DOC area may involve the use, generation, storage, or transport of larger amounts of hazardous materials with the potential for accidental release.

The Project would be required to comply with the MS4 Permit (Order No. 2013-0001-DWQ, as amended), which requires permittees to regulate post-construction development. Permittees must implement a post-construction stormwater management program, as specified in Section E.12 of the Phase II Small MS4 General Permit. In order to meet the NPDES permit guidelines and requirements, permanent storm water control measures would be incorporated into the project in order to mitigate the impacts of pollutants in storm water runoff from the Project. The Project would incorporate site design measures, source control measures, and treatment control measures. As shown on Figure 2-10 in Section 2, onsite flows will be collected and conveyed through a storm drain system to the retention basin. The proposed retention basin has a volume of 255 acre-feet and is located near the south end of the Campus Project site. The retention basin would serve the Project site. If a future city-wide storm drainage solution is pursued, 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.

A guiding stormwater management principle for project should be that it does not result in new impacts to properties downstream or upstream. Potential impacts include considerations of both stormwater quantity and quality. With regard to stormwater quality, the project would be designed to conform with current City of Dixon standard requirements, as discussed below. For water quantity, the objective of the preliminary analysis is to identify the basic post-project storage volumes needed on-site in order to limit post-project peak discharges and associated peak water surface elevations (WSEs) to estimated existing levels in the Covell Drain on its approach to the SR 113 box culvert.

Stormwater from the Project buildings and site would flow into proposed greenway swales, perimeter drainage channel, and onsite retention basin. In order to meet the guidelines and requirements set forth in the "Phase II Small MS4 General Permit, 2013-0001-DWQ," dated February 5, 2013, adopted by the City of Dixon, permanent storm water control measures are proposed to be incorporated into the project in order to mitigate the impacts of pollutants in storm water runoff from the Project.

Implementation of the above-referenced water quality control measures would ensure project compliance with the guidelines and requirements set forth in the "Phase II Small MS4 General Permit, 2013-0001-DWQ," dated February 5, 2013, adopted by the City of Dixon. Implementation of the following mitigation measure would reduce potential surface water quality impacts post-construction to a less than significant level. No additional mitigation is required.

Water Quality Impacts from Discharges to 303(d) Listed Water Bodies: Section 303(d) of the federal Clean Water Act requires States to identify waters that do not meet water quality standards or objectives and thus, are considered "impaired." However, the project area does not directly discharge to any 303(d) listed water bodies. Therefore, the Project would not be expected to further impair any 303(d)-listed water body.

Development and implementation of a SWPPP will utilize BMPs and technology to reduce erosion and

sediments to meet water quality standards during construction. Further, the project design includes the use of stormwater quality features that will minimize non-point source pollution and long-term urban runoff impacts. These would include site design measures, source control measures, and low impact development. These LID measures would likely include both volume-based BMPs (i.e., bioretention, infiltration features, pervious pavement, etc.) and flow-based BMPs (i.e., vegetated swales, stormwater planter, etc.). The use of these features would be dependent upon the location and setting within the Project site. These treatment measures would be designed in accordance with the City of Dixon Storm Water Quality Control Standards. Sizing and configuration of these treatment measures would be determined with the future development of the tentative map and improvement plans for the project.

These stormwater quality features are intended to treat runoff close to the source. Through implementation of the Drainage Plan, water quality would be protected, and the impact would be less than significant. (Draft EIR, pp. 3.10-17 through 3.10-19.)

2. Groundwater Supplies

Threshold: Implementation of the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Findings: Less-than-significant impact. (Draft EIR, pp. 3.10-20 through 3.10-21.)

Explanation: Groundwater Supplies: The Project site area is located within the City's water service area. According to the City of Dixon 2020 Urban Water Management Plan (UWMP), the City relies solely on groundwater from the Solano Subbasin to meet its water demands. As indicated in Section 3.16, Utilities and Service Systems, pursuant to Water Code section 10910(c)(4), and based on the technical analyses described in the Dixon 257 Water Study (Appendix I), the total projected water supplies determined to be available for the Project during normal, single-dry, and multiple-dry water years during a 20 year projection will meet the projected water demand associated with the Project, in addition to existing and planned future uses. Therefore, the City is able to serve the Project in addition to existing and planned developments with the existing and planned future water supplies. Thus, the Project would not substantially decrease groundwater supplies that would impede sustainable groundwater management of the basin; refer to Section 3.16, Utilities and Service Systems, regarding water supplies. As such, implementation of the Project would result in a less than significant impact relative to water supplies.

Groundwater Recharge: The Project would result in new impervious surfaces within the Project site with the potential to reduce rainwater infiltration and groundwater recharge to the Solano Subbasin. As indicated in the Solano Subbasin GSP, groundwater recharge within the Subbasin occurs primarily through infiltration and deep percolation of precipitation falling directly on the landscape within the Subbasin and through applied water (e.g., irrigation), seepage from natural surface waterways, seepage from water conveyance systems (e.g., leaky canals, ditches, and pipes), and deeper subsurface recharge from adjacent and upland recharge source areas outside of the Subbasin. The GSP identifies areas with the highest recharge potential as those occurring along Putah Creek and in the Putah Creek alluvial fan in the northern portion of the Subbasin. Additionally, the GSP identifies large portions of the Project site as having a higher deep percolation rating, meaning that there is high recharge potential based on site soil characteristics.

The new impervious surfaces (e.g., pavement, concrete, and structures) that would be built on the Project site could reduce groundwater infiltration capacity compared to the existing conditions. However, the Project includes pervious areas such as landscaping and would implement LID BMPs that would provide opportunities for on-site infiltration and improved water quality. On-site flows would be conveyed to the proposed retention basin, which would allow for infiltration at a similar rate as the Project site already

infiltrates.

Therefore, potential impacts to groundwater recharge such that the project may impede sustainable groundwater management of the basin are not anticipated. As such, implementation of the Project would have a less than significant impact relative to groundwater recharge. (Draft EIR, pp. 3.10-20 through 3.10-21.)

3. Erosion, Siltation, Flooding, and Runoff

Threshold: Implementation of the Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flood flows?

Findings: Less-than-significant impact. (Draft EIR, pp. 3.10-21 through 3.10-22.)

Explanation: The Project site is located within the Lower Putah Creek Hydrological Area. The Lower Putah Creek Hydrological Area is approximately 225,301 acres and is bound by Putah Creek to the south and Cache Creek to the north. The headwaters of the watershed begin just west of Winters, near Lake Berryessa, and extend to the east, approximately 25 miles, to the Sacramento River. Within the Putah Creek Hydrological Area, there are four principal watersheds, which total 198 square miles. The Project site is located within the Covell Drain watershed. The Covell Drain watershed includes the areas located in the central and north portions of the City, bounded by Putah Creek to the south, Dry Slough and Willow Slough bypass to the north, and the East Dixon watershed to the east.

The development of the Project, when complete, would result in new impervious surfaces and thus could result in an incremental reduction in the amount of natural soil surfaces available for the infiltration of rainfall and runoff, thereby generating additional runoff during storm events. Additional runoff could contribute to the flood potential of natural stream channels or contribute runoff that could exceed the capacity of the City's drainage system.

If the Project is developed, the on-site impervious area would increase, leading to faster and increased levels of runoff. However, the increased rate of runoff would be attenuated using new on-site facilities, including bio-retention areas spread throughout the parks and landscaped areas on the Project site. In general, runoff from the Project site would be routed through a network of proposed bio-treatment basins, proposed storm drain systems, and the proposed retention basin to the adjacent existing connection points.

In addition to the water quality treatment measures, the project proposes to handle the expected increase in the site's post-project peak discharge relative to pre-project conditions, resulting in no net increase of peak runoff.

The Project is proposing 13.5 acres of open space/landscaping around the perimeter of and throughout the Project site. The resulting 100-year peak discharge from the Project was estimated at 53.2 cubic feet per second (cfs), which is equal to existing conditions.

Onsite flows will be collected and conveyed through a storm drain system to the retention basin.

The proposed retention basin has a volume of 255 acre-feet and is located near the south end of the Campus

Project site. The retention basin would serve the Project site. If a future city-wide storm drainage solution is pursued, 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. Based on a preliminary long term infiltration rate of 4 inches per day, the required retention basin storage is approximately 255 acre-feet. The final design of the retention basin will require additional geotechnical investigations to determine the long-term information rate. The retention basin will hold the runoff without a discharge to the DRCD facilities.

In order to meet the guidelines and requirements set forth in the "Phase II Small MS4 General Permit, 2013-0001-DWQ," dated February 5, 2013, adopted by the City of Dixon, permanent storm water control measures would be incorporated into the project in order to mitigate the impacts of pollutants in storm water runoff from the Project. The Project would incorporate site design measures, source control measures, and treatment control measures consisting of bio-treatment basins dispersed throughout the site, as described under Impact 3.10-2 (above). At final design, an Operation and Maintenance plan would be developed specifying the inspection frequencies, maintenance activities, and record keeping required to maintain the proposed permanent stormwater control measures. Regular inspection and maintenance would be required for landscaped areas, irrigation systems, bio-treatment areas, and storm drain systems on-site.

The Project would not substantially alter the existing drainage pattern of the site or area, in a manner that would result in substantial erosion or siltation, result in flooding, or exceed the capacity of the existing or planned stormwater drainage systems. Therefore, this is a less than significant impact. (Draft EIR, pp. 3.10-21 through 3.10-22.)

4. Flood Hazard or Tsunami Zones

Threshold: Implementation of the Project would not risk release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones?

Findings: Less-than-significant impact. (Draft EIR, pp. 3.10-22 through 3.10-23.)

Explanation: The Project site is not located within a FEMA designated flood hazard zone. As shown in Figure 3.10-2, the entire site is located within an area of minimal flood hazard. However, the entire City of Dixon, including the Project site, is located such that a catastrophic failure of Monticello Dam at Lake Berryessa could cause flooding. The federally-owned Monticello Dam is under the oversight of the Bureau of Reclamation, which regularly monitors and inspects the dam to ensure the facilities do not present unreasonable risks to the public, property, or the environment. The Project would not result in actions that could result in a higher likelihood of dam failure at Monticello Dam. There will always be a remote chance of dam failure that results in flooding of the City of Dixon, including the Project site. However, given the regulations provided in the Safety of Dams Act, and the ongoing monitoring performed by the Bureau of Reclamation, the risk of loss, injury, or death to people or structures from dam failure is considered less than significant.

Due to the distance from the San Francisco Bay and associated water bodies, the Project site is too far away from the nearest ocean to have any meaningful tsunami risk. A seiche, a standing wave in an enclosed or partially enclosed body of water, would not be a threat to the Project site as there are no large bodies of water nearby that present substantial risk to the Project. As a result, tsunamis and seiches do not pose hazards due to the site's inland location and lack of nearby bodies of standing water.

Compliance with existing regulations would ensure that implementation of the Project would have a less than significant impact associated with the release of pollutants due to project inundation. (Draft EIR, pp. 3.10-22 through 3.10-23.)

5. Water Quality Control Plan and Groundwater Management Plan

Threshold: Implementation of the Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Findings: Less-than-significant impact. (Draft EIR, page. 3.10-23)

Explanation: As described above, the local water quality control plan (Basin Plan) is maintained by the Central Valley RWQCB. The Basin Plan specifies the State's water quality standards (i.e., beneficial uses, water quality objectives, and antidegradation policy) and serves as the basis for the RWQCB's regulatory programs. When permittees and projects comply with the provisions of applicable NPDES permits and water quality permitting, they are consistent with the Basin Plan. Through compliance and implementation of existing regulations, implementation of the Project would not conflict with or obstruct a water quality control plan. Therefore, impacts in this regard would be less than significant.

As described above, the Solano Subbasin was designated a medium priority basin. In compliance with SGMA, the GSA Collaborative developed a GSP and submits an annual report to the DWR detailing groundwater conditions for the Subbasin and GSP implementation status for the prior year. The Solano Subbasin GSP guides sustainable management of the Subbasin and achieves compliance with SGMA. The Project would be subject to compliance with the GSP. Therefore, the project would not conflict with implementation of a sustainable groundwater management plan and impacts in this regard would be less than significant. (Draft EIR, page. 3.10-23.)

J. LAND USE AND PLANNING

1. Divide an Established Community

Threshold: Would the Project physically divide an established community?

Findings: No impact. (Draft EIR, page 3.11-8.)

Explanation: As noted in the Dixon General Plan, the City of Dixon has planned for orderly, logical development that supports compatibility among adjacent uses via the compatibility standards. The General Plan describes that it seeks to ensure the provision of efficient services while discouraging urban sprawl and the premature conversion of agricultural and open space lands by preventing overlapping jurisdictions and duplication of services.

The approximately 260-acre Project site is currently undeveloped and has been previously used for agricultural uses. The Project site has developed land uses on three sides, with rural residential development located to the northwest (across I-80). The Project would consist of a phased, mixed-use development that includes an approximately 48-acre Dixon Opportunity Center, approximately 144 acres of residential uses, and approximately 2.5 acres of commercial uses. The project would be phased such that the areas adjacent to existing development would be developed first. The Project would not physically divide an established community. Rather, the project represents a mixed-use development within the City limits, adjacent to areas of the City that are currently urbanized. Therefore, the project would have no impact related to physically dividing an established community. (Draft EIR, page 3.11-8.)

2. Applicable Land Use Plans, Policies, or Regulations

Threshold: Would the Project cause a significant environmental impact due to a conflict with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Findings: Less-than-significant impact. (Draft EIR, pp. 3.11-8 through 3.11-28.)

Explanation: Some of the land to the east of the Project site, located in Solano County and outside the Dixon City limits, is currently in agricultural production. The land to the east is governed by the Solano County General Plan and zoning ordinance. The Project is not under the jurisdiction of Solano County. As such, County policy documents, such as the Solano County General Plan, do not apply to the Project. It is anticipated that those agricultural lands to the east would remain as agricultural land uses until (if and when) the County changes the land use designation for that land. However, the Project would not result in a conflict with the County's General Plan or zoning ordinance. This is considered a less-than-significant impact.

As noted previously, the NEQSP establishes a land use and circulation plan, policies and guidelines for the ultimate development of 643 acres in the northeast portion of the City of Dixon. The NEQSP defines the land use and development concepts to be applied in the plan area and is intended to implement the objectives and policies of the City of Dixon General Plan.

The Project site is located on the eastern edge of the NEQSP adjacent to Pedrick Road. The Project includes amendments to the NEQSP related to utilities and circulation. Specifically, the proposed NEQSP amendment includes modifications to the wastewater collection system to better serve The Campus. Additionally, 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. Further, 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 existing 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 proposed NQESP amendment will ensure the project's consistency with the City's NEQSP requirements pertaining to utilities and circulation. This is considered a less-than-significant impact.

The Land Use Map portrays the anticipated uses of land in and around Dixon through land use designations. The City's Land Use Map designates the Project site as CAMU. As defined by the City's 2040 General Plan, the CAMU designation is intended to foster new mixed-use employment districts with a range of job-generating uses, housing, and easy access to the regional transportation network. The CAMU designation would promote clusters of related light industrial, manufacturing, office, research & development, retail, hotel, service, and residential uses on large parcels near or adjacent to I-80 and SR-113 at gateways to the City. The CAMU designation is primarily intended to support mixed-use development projects, however single-use projects may be permitted so long as a mix of uses is developed throughout the CAMU designation. Mixed use can be vertical and/or horizontal. Allowable FAR is 30 percent to 60 percent (combined residential and non-residential uses) and maximum allowable residential density is 30 dwelling units per acre. Corresponding zoning will be performance-based in order to promote flexibility and minimize non-conformance issues of existing uses.

The project 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 uses would include job-generating uses and housing in an area of the City that has easy access to I-80. Additionally, as shown in Table 2-1 in Chapter 2, Project Description, the Project would result in a residential density of 7.2 dwelling units per acre. Further, the proposed Dixon Opportunity Center (DOC) would result in an employment FAR of 30 (based on a calculation of 660,000 square feet over 50.36 acres or 2,193,681 square feet). As such, the proposed uses and densities are consistent with the allowed CAMU densities.

Additionally, as shown in Table 3.11-1, the Project is consistent with the applicable General Plan policies and actions that aim to avoid or mitigate an environmental effect. Overall, the Project would have a less-than-significant impact relative to General Plan consistency.

Title 18 of the City's Municipal Code contains the Zoning Code. The Project site is currently zoned as PAO-PUD, CN-PUD, and ML-PUD. The project includes an application to rezone site to CAMU-PD consistent with the property's current General Plan land use designation of CAMU. The City is concurrently processing a comprehensive update to its Zoning Ordinance and Zoning Map to align the Zoning with the recently updated General Plan. The comprehensive Zoning Ordinance update is currently in the adoption phase and to be considered for adoption by the City Council on April 2, 2024. The comprehensive Zoning Ordinance and Map update also had a separate environmental review to consider the update. If the City's update precedes review and action on this project, the rezoning request included in this project would no longer be necessary.

Section 18.18 establishes processing, planned development content requirements, and standards for the PD district. The proposed PD would provide for the range of uses and development standards consistent with the project as described in Chapter 2.0 and would ensure that all applicable zoning requirements are met. With continued compliance with Chapter 18.18, the project would be consistent with the City's Zoning Code and this impact would be less than significant.

Overall, the project as proposed, including amendment to the NEQSP and Zoning, would be consistent with the NEQSP, City of Dixon General Plan, and Zoning Code. Therefore, the project will have a less-than-significant impact. (Draft EIR, pp. 3.11-8 through 3.11-28.)

H. NOISE

1. Local Noise Standards

Threshold: Would the Project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Findings: Less-than-significant impact. (Draft EIR, pp. 3.12-13 through 3.12-17.)

Explanation: Implementation of the Project would result in an increase in daily traffic volumes on the local roadway network, and consequently, an increase in noise levels from traffic sources along affected segments. Table 3.12-9 shows the predicted traffic noise level increases on the local roadway network for Existing and Existing Plus Project conditions. Table 3.12-10 shows the predicted traffic noise level increases on the local roadway network for the Cumulative No Project and Cumulative Plus Project conditions. Appendix F provides the complete inputs and results of the FHWA traffic noise modeling. The FICON guidelines specify criteria to determine the significance of traffic noise impacts. Where existing traffic noise levels are greater than 65 dBA Ldn, at the outdoor activity areas of noise-sensitive uses, a +1.5

dBA Ldn increase in roadway noise levels will be considered significant. Where traffic noise levels are between 60 dBA Ldn and 65 dBA Ldn, a +3.0 dB Ldn increase in roadway noise levels will be considered significant. Where traffic noise levels are less than 60 dBA Ldn, a +5.0 dB Ldn increase in roadway noise levels will be considered significant.

According to Tables 3.12-10 and 3.12-11, the ambient noise environment in the Project vicinity as defined by the analyzed road segments does not exceed 60 dBA Ldn at the existing sensitive receptors. Therefore, the significance criterion for all segments is +5.0 dBA. As shown in the tables, the greatest increase due to traffic from the Project is +3.0 dBA, which is less than the threshold of +5.0 dBA. Therefore, impacts resulting from increased traffic noise would be considered less than significant.

The Project would include typical residential noise such as people talking, noise associated with outdoor recreation activities, domesticated animals such as dogs, and landscape maintenance equipment such as mowers. These types of noises would be similar to and compatible with the types of noise created at the existing adjacent residential uses approximately 400 feet south of the Project site. Therefore, non-transportation noise created by the Project would have a less-than-significant impact.

During the construction of the Project, noise from construction activities would temporarily add to the noise environment in the Project vicinity. As shown in Table 3.12-11, activities involved in construction would generate maximum noise levels ranging from 76 to 90 dB at a distance of 50 feet. Construction activities would also be temporary in nature and are anticipated to occur during normal daytime working hours.

Caltrans defines a significant increase in noise as 12 dBA over existing ambient noise levels; this criterion was used to evaluate increases due to construction noise associated with the Project. As shown in Table 3.12-11, construction equipment is predicted to generate noise levels of up to 90 dBA Lmax at 50 feet. Construction noise is evaluated as occurring at the center of the site to represent average noise levels generated over the duration of construction across the Project site. The nearest residential uses are located approximately 400 feet to the south as measured from the center of the Project site. At this distance, maximum construction noise levels would be up to 72 dBA. The average daytime maximum noise level in the vicinity of the sensitive receptors was measured to be 86 to 88 dBA. Therefore, Project construction would not cause an increase of greater than 12 dBA over existing ambient noise levels.

Noise would also be generated during the construction phase by increased truck traffic on area roadways. A Project-generated noise source would be truck traffic associated with transport of heavy materials and equipment to and from the construction site. This noise increase would be of short duration and would occur during daytime hours.

Construction activities are temporary in nature and are likely to occur during normal daytime working hours between 7:00 a.m. and 7:00 p.m. Further, construction activities would comply with best management practices such as fitting construction equipment with manufacturer-recommended mufflers and maintaining construction equipment to assure that no additional noise, due to worn or improperly maintained parts, will be generated. The City exempts temporary construction noise through the implementation of Dixon Municipal Code Section 18.28.050.C. Noise from construction equipment or activities such as grading, trenching, preparing building foundations, building erection, or other similar construction-related noise emitting activities would not be subject to noise performance thresholds set forth elsewhere in the City's Municipal Code. Therefore, construction-related noise impacts would be less than significant.

Compliance with City's standards on new noise-sensitive receptors is not a CEQA consideration. However, this information is provided here so that a determination can be made regarding the ability of the

Project to meet the requirements of the City of Dixon for exterior and interior noise levels at new sensitive uses proposed under the project.

As shown on Figure 3.12-3, several of the proposed residential outdoor activity areas along Pedrick Road are predicted to be exposed to exterior transportation noise levels up to approximately 71 dBA Ldn if the site remained as-is, with no intervening shielding between Pedrick Road and the Project site. This noise level would be considered "normally unacceptable" for outdoor areas established by the City of Dixon.

However, the Project includes the construction of a 6-foot sound barrier at the rear lot line of residential lots adjacent to the west boundary of the relocated retention basin.. Inclusion of this soundwall will lower noise levels at all residential outdoor activity areas on the project site to 65 dBA Ldn or lower. Figure 3.12-4 shows the sound wall and resulting noise level contours.

Modern building construction methods typically yield an exterior-to-interior noise level reduction of 25 dBA. Therefore, where exterior noise levels are 70 dBA Ldn, or less, no additional interior noise control measures are typically required. For this project, exterior noise levels are predicted to be up to 69 dBA Ldn at the second story of the buildings closest to Pedrick Road. This would result in interior noise levels of up to 44 dBA Ldn at the second story receivers based on typical building construction. This meets the City of Dixon interior noise level standards which require that interior noise levels do not exceed 45 dB Ldn. Therefore, no additional noise control measures are required to reduce interior noise to acceptable levels.

CEQA does not require the analysis of existing noise source impacts on proposed new sensitive receptors. However, this information is provided here so that a determination can be made regarding the ability of the Project to meet the requirements of the City of Dixon for exterior and interior noise levels at new sensitive uses proposed under the project.

As shown on Figure 3.12-5, the proposed outdoor activity areas are predicted to be exposed to exterior non-transportation noise levels up to approximately 54 dBA Leq. Sources of offsite, existing noise include the Campbell's Soup Supply Company, which emits noise particularly during the tomato processing season, generally June through October. Noises associated with this source include manufacturing machinery and haul trucks and shipping trucks access the plant continuously during the tomato processing season. Further, trains along the UPRR railroad tracks to the southeast of the Project site could be audible from the Project site. These non-transportation noise levels would comply with the 55 dBA Leq noise level limits for outdoor areas established by the City of Dixon. Therefore, no additional noise control measures would be required. (Draft EIR, pp. 3.12-13 through 3.12-17.)

2. Groundborne Vibration or Noise Levels

Threshold: Would the Project generate excessive groundborne vibration or groundborne noise levels?

Findings: Less-than-significant impact. (Draft EIR, pp. 3.12-17 through 3.12-18.)

Explanation: Construction vibration impacts include human annoyance and building structural damage. Human annoyance occurs when construction vibration rises significantly above the threshold of perception. Building damage can take the form of cosmetic or structural damage. The primary vibration-generating activities generated by the Project would be grading, utilities placement, and parking lot construction. Table 3.12-12 shows the typical vibration levels produced by construction equipment.

With the exception of vibratory compactors, the Table 3.12-12 data indicate that construction vibration levels anticipated for the Project are less than the 0.2 in/sec threshold at a distance of 25 feet. Use of vibratory compactors within 26 feet of the adjacent buildings could cause vibrations in excess of 0.2 in/sec. Structures which could be impacted by construction-related vibrations, especially vibratory compactors/rollers, are located approximately further than 30 feet from where compaction would occur. Therefore, this is a less-than-significant impact.

Although not a CEQA issue, it may be possible for residents of the Project to experience some vibration associated with operation of the UPRR railroad tracks to the southeast of the Project site. Vibration associated with passing trains is not expected to cause undue impact to future residents of the Project, nor cause damage to buildings on the Project site. (Draft EIR, pp. 3.12-17 through 3.12-18.)

3. Airport Noise

Threshold: Is the Project located within the vicinity of a private airstrip or an airport land use plan, within two miles of a public airport or public use airport, and would not expose people residing or working in the Project area to excessive noise levels.?

Findings: No Impact. (Draft EIR, page 3.12-18.)

Explanation: The Project site is not located within two miles of a public or private airport or airstrip. The nearest airport, the University Airport, is located approximately 4.1 miles northeast of the Project site. Therefore, the Project would have no impact related to airports and airport noise. (Draft EIR, page 3.12-18.)

I. POPULATION AND HOUSING

1. Induce Substantial Growth

Threshold: Would the Project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure) and displace a substantial number of people requiring the construction of new housing?

Findings: Less-than-significant impact. (Draft EIR, pp. 3.13-9 through 3.13-10.)

Explanation: The project proposes a mixed-use development within the City's NEQSP consisting of a 48-acre Dixon Opportunity Center (DOC) area developed to accommodate technology, business park, and light industrial uses; approximately 144 acres of residential uses; and approximately 2.5 acres of commercial uses. The project also includes infrastructure improvements and roadway modifications. Project implementation could yield a net change over existing conditions of 1,041 additional dwelling units and approximately 687,000 square feet of non-residential uses. The project would accommodate future residential growth and development primarily by amending the NEQSP and rezoning the project site to Campus Mixed Use Planned Development (CAMU-PD), consistent with the City's recently adopted 2040 General Plan Campus Mixed Use designation.

Implementation of the Project would allow for the development of up to 1,041 net new housing units with a population increase of approximately 2,988 people.

Potential impacts associated with substantial unplanned population growth in an area are assessed based on a project's consistency with adopted plans that have addressed growth management from a local

and regional standpoint. As indicated above, the Dixon General Plan 2040 EIR anticipates a total of 9,506 dwelling units and a population of 28,893 within the General Plan Planning Area. In addition, the Dixon General Plan 2040 identifies anticipated growth occurring primarily within four key areas, including the NEQSP area. Thus, population growth within the project site has been anticipated by the General Plan. The population and employment growth anticipated as a result of project implementation is within the overall City's growth projections of the Dixon General Plan 2040. Thus, the Project would be within the population projections anticipated and planned for by the City's General Plan and would not induce substantial unplanned population growth in the area.

In addition, ABAG's Plan Bay Area 2050 projects that from 2015 through 2050, households in the North Solano County sub-region (which includes Dixon) will increase by 30,000 housing units (or approximately 91,200 persons). As such, the population that would result from the project would not exceed growth planned for the region.

It is noted that the project would ultimately be constructed in three phases to allow for its orderly development. The first phase of development would consist of approximately 405 market-rate residential units, as well as infrastructure improvements and roadways to serve the development. Development associated with the Project would provide for employment opportunities, particularly during construction phases. However, temporary construction jobs do not typically provide employment opportunities that involve substantial numbers of people needing to permanently relocate to fill the positions, but rather would provide employment opportunities to people within the local community and surrounding areas.

Overall, the project is consistent with the regional growth projections prepared by the General Plan and ABAG. With implementation of General Plan policies and Municipal Code requirements intended to guide growth and provide services necessary to accommodate growth, including reducing potential environmental impacts related to growth, impacts associated with the unplanned population growth would less than significant. (Draft EIR, pp. 3.13-9 through 3.13-10.)

J. PUBLIC SERVICES

1. Fire Protection Services

Threshold: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or a need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services?

Findings: Less-than-significant impact. (Draft EIR, pp. 3.14-13 through 3.14-14.)

Explanation: The Fire Department currently operates the station at 205 Ford Way, approximately 1.02 miles from the southern boundary of the Project site. A new fire station, Fire Station 82, is planned to be constructed at the corner of Pitt School Road and Lavender Lane, which would respond to service calls in the southern and western portions of the city. The addition of Station 82 to the City Fire Department would then allow trucks and personnel from the existing fire station to respond more rapidly to service calls in the northern and eastern portions of the city, including the NEQSP area. Response times to the NEQSP area would be under 5 minutes 12 seconds, meeting the City's baseline performance objective.

The current service ratio for the City of Dixon Fire Department is 0.53 firefighters, both paid and volunteers, per 1,000 people (36 firefighters/19,018 people). The Project would include residential development, resulting in the addition of up to 1,041 residential units in total. This would allow for a

maximum population of approximately 2,988 residents, based on the person per household rate of 2.87 according to the California Department of Finance E-5 City/County Population and Housing Estimates.

Despite a steady increase in calls for service, the Dixon Fire Department's staffing has largely remained the same since 2006 (Dixon Fire Department, 2022). Current staffing and equipment levels provide an adequate number of firefighters for smaller fires and common medical or rescue situations, supplemented by mutual aid agreements with other local municipalities. Projected buildout population and housing numbers correspond to an increase in need for Fire and Emergency services. However, the General Plan EIR concluded that the fire protection infrastructure maintains acceptable service ratios, response times, and other performative objectives related to fire protection. Furthermore, individual development projects, including the Project, would be subject to Fire Department review and approval and would be required to pay the City's standard public safety impact fees (Policies PSF.1-5 and PSF.1-6). These proactive measures help mitigate fire risk and lessen service demand and are further augmented by other policies that incentivize the retrofit of historic buildings to include fire sprinklers and modern fire-stopping construction techniques, establish a volunteer-based Community Emergency Response Team, and educate the community through various outreach programs about fire safety and disaster preparedness. The City of Dixon has adopted citywide development impact fees, which include Public Safety Impact Fees. The City Council adopts an annual budget allocating resources to fire protection services, which effectively establishes the service ratio for that particular year. The annual budget is based on community needs and available resources as determined by the City Council and the Fire Chief. Therefore, in accordance with existing law, prior to issuance of any building permits for any phase of development, the project applicant shall pay the City's Public Safety Impact Fees. Implementation of the Project would thus not require provision of new or physically altered facilities in order to maintain acceptable police service ratios and response times. Therefore, the Project would have a less-than-significant impact to fire protection services. (Draft EIR, pp. 3.14-13 through 3.14-14.)

2. Police Services

Threshold: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or a need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services?

Findings: Less-than-significant impact. (Draft EIR, page 3.14-15.)

Explanation: The current service ratio for the City of Dixon Police Department is 0.67 officers per 1,000 people (28 sworn officers/19,018 people). Police service is evaluated and addressed annually on a city-wide level by the Dixon City Council and Police Chief. The City Council adopts an annual budget allocating resources to police services, which effectively establishes the service ratio for that particular year. The annual budget is based on community needs and available resources as determined by the City Council and the Police Chief. The Department would also continue to receive aid from other police departments such as those from adjacent municipalities in event of emergencies to meet additional need (Policy PSF.1-4). Further, the General Plan EIR concluded that impacts related to increased demand for law enforcement services were determined to be less than significant. The existing Police Department would be sufficient to serve the Project. Therefore, the Project would not require the construction of new or expanded police stations.

The City collects impact fees from new development based upon projected impacts from the development. The City also reviews the adequacy of impact fees on an annual basis to ensure that the fee is commensurate with anticipated future facilities demands, assessed on a fair share basis for new

development. Implementation of the Project would thus not require provision of new or physically altered facilities in order to maintain acceptable police service ratios and response times. Payment of the applicable impact fees by the project applicant and other revenues generated by the project would ensure that project impacts to police services are less than significant. (Draft EIR, page 3.14-15.)

3. Schools

Threshold: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or a need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools?

Findings: Less-than-significant impact. (Draft EIR, pp. 3.14-15 through 3.14-16.)

Explanation: The Project would be a residential development, resulting in the addition of up to 1,041 residential units in total. 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. 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 increase in population as a result of Project implementation would result in the introduction of additional students to the DUSD. Table 3.14-7 presents the estimated increase in student enrollment as a result of the Project. As shown in Table 3.14-7, the Project is expected to generate 431 additional students for the DUSD in total. Students within the Project site would most likely attend Gretchen Higgins Elementary, John Knight Middle School, and Dixon High School, subject to DUSD's determination. DUSD has a student capacity of 5,241 students, well beyond the current enrollment at all school levels, as seen in Table 3.14-3. Assuming the existing facilities remain in sufficient condition to maintain existing levels of service, the DUSD has an available capacity of 2,030 students. Therefore, DUSD has sufficient capacity to accommodate the new students generated by the Project.

Under the provisions of SB 50, a project's impacts on school facilities are fully mitigated via the payment of the requisite new school construction fees established pursuant to Government Code Section 65995. On February 23, 2022, the Dixon Unified School District Board of Education updated the statutory fee amounts to $4.79 per square foot for new residential development and $0.78 per square foot for new commercial/industrial construction. Through payment by the applicant or of special assessments by property owners within the project and payment of any applicable impact fees by the project applicant would ensure that project impacts to school services are less than significant. (Draft EIR, pp. 3.14-15 through 3.14-16.)

4. Parks and Recreational Facilities

Threshold: Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities, such that substantial physical deterioration of the facility would occur, or be accelerated?

Findings: Less-than-significant impact. (Draft EIR, pp. 3.14-16 through 3.14-18)

Explanation: The City of Dixon maintains six public parks, representing approximately 89.85 acres of parkland in the City of Dixon. There are about 18.52 acres of neighborhood parks, 71.33 acres of community parks, and 1.5 miles of trails in the City of Dixon. The City of Dixon adopted the Parks and Recreation Master Plan in 2023, which establishes goals for distances to Neighborhood Parks and Community Parks.

The General Plan and the adopted 2023 Parks and Recreation Master Plan, establishes standards for parkland acreage and access. The City has established a standard of 5.0 acres of community or neighborhood recreational or park facility per 1,000 residents to ensure adequate recreational open space for the enjoyment of the community. To ensure an appropriate balance of local and community-serving facilities, the General Plan and Parks Master Plan recommend a target of 1.2 acres of neighborhood park per 1,000 residents and 3.8 acres of and community park per 1,000 residents for a total of 5 acres per 1,000 residents.

The Parks Master Plan also lists the service area for a neighborhood park as a half-mile radius, typically translated to a 10-minute walking distance, or walkshed. The distribution of parkland throughout the community is relatively balanced; most residents live within a half-mile walk of a park or recreational facility. Development of new facilities in the Project will ensure the access standard of a half-life is maintained throughout the Project site. (Draft EIR, pp. 3.14-16 through 3.14-18)

5. Other Public Services

Threshold: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or a need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for public services?

Findings: Less-than-significant impact. (Draft EIR, page 3.14-18.)

Explanation: The Project will bring residents to the area and increase demand for other public facilities within the City of Dixon, such as libraries and community buildings. However, given that the additional population increase associated with the project is a small percentage of the population of the City as a whole, significant impacts due to increased demand on library and community facilities are not expected. The City collects impact fees from new development based upon projected impacts from each development, including impacts on other public services as required by Chapter 4.07 Capital Facilities Fees of the City's Municipal Code. The City also reviews the adequacy of impact fees on an annual basis to ensure that the fee is commensurate with services provided. Payment of the applicable impact fees by the Project applicant, and ongoing revenues that would come from property taxes, sales taxes, and other revenues generated by the Project, would fund capital and labor costs associated with these other public services. The Project does not trigger the need for new facilities associated with other public services. Consequently, new facilities for other public services are not proposed at this time. Payment of the applicable impact fees by the project applicant and other revenues generated by the project would ensure that project impacts to other public facilities are less than significant. (Draft EIR, page 3.14-18.)

K. TRANSPORTATION

1. Consistency with Circulation Performance Plans

Threshold: Would implementation of the Project conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Findings: Less-than-significant impact. (Draft EIR, pp. 3.15-20 through 3.15-21.)

Explanation: The following discussion focuses on whether the Project would result in impacts to existing or planned pedestrian facilities, bicycle facilities, or transit facilities and services within the project area or other plans, policies, or goals.

Bicycle and Pedestrian Facilities

A review of the site plan and Traffic Impact Analysis (2024) do not indicate the project would adversely impact existing or planned pedestrian facilities.

There are no bicycle or pedestrian facilities within the study area under existing conditions. The project does not conflict with any identified future pedestrian or cycling facilities; the proposed bicycle facilities as shown in the Dixion General Plan Mobility Element will be integrated into the site and the project will provide portions of the Class I path identified by the Mobility Element along the project frontage on Pedrick Road. Internal roads on the Project site will include pedestrian facilities on internal roads and intersections designed consistent with City of Dixon Engineering standards. Further, pedestrian paseos would be present throughout the Project site, connecting parks and open spaces to the residential areas and DOC.

Based on the above, the Project would not conflict with a program, plan, ordinance, or policy addressing pedestrian and cycling facilities, and a less-than-significant impact would occur.

Transit Facilities

A review of the site plan and Traffic Impact Analysis (2024) does not indicate the project would adversely impact existing or planned transit facilities. There are currently no fixed transit routes or bus stops in the project area. The operations of the Project would not conflict with a program, plan, ordinance, or policy addressing transit facilities and a less-than-significant impact would occur.

Planned Closure of Vaughn Road Railroad Crossing and Pedrick Road Overcrossing

The project will provide new connectivity between Pedrick Road and Vaughn Road via Professional Drive and Commercial Drive. This connectivity could allow a future closure of the Vaughn Road railroad crossing by providing alternative routes between Pedrick Road and Vaughn Road, as recommended in the Dixon Area Advanced Traffic and Railroad Safety Study. In addition, the new intersection of Commercial Drive with Pedrick Road has been located to accommodate the eventual overcrossing of the Pedrick Road railroad crossing with sufficient clearance to meet UPRR standards.

The Project will not conflict with planned bicycle, pedestrian, or transit facilities nor the removal of the two at grade railroad crossings. The project would have a less-than-significant impact. (Draft EIR, pp. 3.15-20 through 3.15-21.)

2. Transportation Hazards

Threshold: Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?

Findings: Less-than-significant impact. (Draft EIR, pp. 3.15-23 through 3.15-26.)

Explanation: The proposed site plan illustrated in Figure 3.15-3, as well as the TIA were reviewed for design features that would result in an increased hazard including sharp curves, steep grades or complex

intersections. The proposed site plan does not include any of these elements and the geometric design assessment did not identify any sharp curves, steep grades or complex intersections that would result in an increased hazard.

Impacts to Caltrans Facilities

The evaluation of potential impacts on Caltrans facilities focuses on whether project-related traffic could lead to significant queuing at freeway off-ramps, specifically causing traffic to queue back beyond the freeway gore points. If the project's traffic could disrupt the flow on the freeway by extending queues onto the freeway mainline, it is considered to have a significant impact.

The Traffic Impact Analysis (TIA) examined queuing conditions at two freeway off-ramp intersections to understand the project's impact under existing conditions, an opening day (2025) scenario, and cumulative (2040) scenario. These timeframes were analyzed during a.m. and p.m. peak traffic hours. The freeway ramp intersections evaluated are:

- Pedrick Road at I-80 Westbound Ramps/Sievers Road intersection.
- Pedrick Road at I-80 Eastbound Ramps/Sparling Lane intersection.

Currently, both intersections operate with all-way stop control. The distance from the stop-bars at these intersections to the gore points of the I-80 off-ramps is approximately 1,200 feet, measured using Google Earth, providing a measurable distance to assess queuing impacts.

The TIA used Synchro software to conduct queue analysis, determining the 95th percentile queue lengths during peak periods and comparing these to the available storage length evaluate spill over, potentially impacting adjacent lanes or extending through nearby intersections.

Findings from this analysis are summarized in Table 3.15-7. According to the results, under baseline conditions for the years analyzed, neither off-ramp is expected to experience queue spillback that reaches the gore point on I-80, indicating that the project-related traffic is not anticipated to cause significant impacts at these Caltrans facilities. Based on this finding, the project would have a less-than-significant impact.

Impacts to related Incompatible Uses

The study area is adjacent to agricultural lands and processing facilities, potentially leading to hazards from incompatible uses with the proposed development. The Solano County Department of Resource Management expressed concerns about the high-density residential development being too close to agricultural activities.

A major concern centers on the Campbell's Soup Supply Company Facility at 8380 Pedrick Road, a key local economic entity, which has its primary access within the study area. The Department highlighted concerns about potential negative impacts on Campbell's, including operational disruptions from new housing and high-volume intersections, especially problematic during the harvest season's increased truck traffic. Concerns are not limited to Campbell's, but extend to the broader network of local agriculture-dependent businesses.

The County stresses the importance of designing the Project to ensure roads and intersections do not negatively impact agricultural support facilities and trucking routes essential to Campbell's and the agricultural community. The Development Agreement for the Project requires roadway improvements, including the widening of Pedrick Road to create two southbound lanes, a two-way-left-turn lane/median,

and two northbound lanes, where currently a two-land roadway exists. Under existing conditions, when making a left turn into the Campbells facility, trucks must wait for oncoming traffic to safely clear before making a left turn, which stalls traffic heading southbound. The Project will alleviate this condition with a dedicated left turn lane and result in commensurate safety improvements. Safety for northbound right turn movements into the Campbells facility will also be improved by the northbound two-lane section by allowing right turn truck movements into the Campbells facility without blocking other northbound traffic. The TIA conducted by Flecker Associates, dated March 2024, reviewed operations on the study road network illustrated in Figure 3.15-4 and proposed improvements to the study road network that would mitigate operational deficiencies to a level acceptable by City standards. This study examined traffic operations within the study road network for existing conditions, as well as projected scenarios for opening day (2025) and cumulatively by 2040. It assessed the performance of study intersections in terms of LOS and queuing, with a focus on maintaining acceptable traffic flow as defined by the City of Dixon's LOS thresholds. As noted previously, the analysis related to intersection LOS is not applicable for CEQA analysis but will otherwise be used to qualitatively describe the impact of the project on the study road network to assess concerns raised by the County on incompatible land use and impacts to facilities that support agriculture.

TIA findings indicate that most study intersections are expected to meet the City of Dixon's acceptable LOS thresholds by 2025, with the Pedrick Road at I-80 Eastbound Ramps/Sparling Lane requiring signalization.

In summary, while the County's concerns regarding the proximity of residential development to agricultural operations are valid, the proposed improvements outlined in the TIA will promote safe and orderly operations at intersections along Pedrick Road, particularly with ingress and egress at Campbell's facility. The projected increase in traffic is consistent with city policy and the arterial classification of the roads in question.

This assessment assumes the proposed intersection improvements outlined in the TIA are implemented. Based on this assumption, the project would have a less-than-significant impact.

Impacts to Emergency Access

Assessing emergency access for a large site such as the Project involves evaluating the design and infrastructure to ensure that emergency services (fire, police, and medical) can reach and operate within the site quickly and efficiently in case of emergencies. Key considerations and steps in the assessment process:

- Multiple Access Points: Ensure there are at least two access points to the subdivision to provide alternative routes for emergency vehicles in case one is blocked.
- Road Width and Turn Radius: Roads should be wide enough to accommodate large emergency vehicles, with adequate turn radii at corners and cul-de-sacs.
- Surface and Maintenance: Roads must be capable of supporting the weight of heavy emergency vehicles and maintained in good condition, including during construction phases.
- Fire Lane Designation: Designate and clearly mark fire lanes that are no-parking zones to ensure unobstructed access.
- Building Access: Buildings should have clear access for firefighters, including considerations for ladder access in multi-story structures.
- Ensure there are adequate provisions for emergency vehicles to turn around, especially in dead-end streets or cul-de-sacs, following the specific requirements of local emergency services.
- Ensure the site plan complies with all relevant local, state, and federal regulations regarding emergency access and services.

- The City of Dixon has the following requirements related to access and circulation in the City of Dixon Fire Code
- All-weather Surface Requirements: Roads must have a durable surface, such as asphalt or concrete, capable of supporting vehicles up to 75,000 lbs, ensuring access in all conditions.
- Fire Access Road Specifications: Must feature a minimum turning radius of 28 feet inside and 52 feet outside, accommodating the maneuverability of fire apparatus.
- Temporary Fire Access Roads: For construction sites, temporary roads must support fire apparatus, include turn-around provisions for long roadways, and maintain unobstructed access.
- Obstruction Policies: Staging areas, equipment, or parking must not impede fire department access roads or access to structures and hydrants.

Based on the above, the proposed development project would not substantially increase hazards due to inadequate emergency access, and the impact would be less than significant. (Draft EIR, pp. 3.15-23 through 3.15-26.)

3. Construction Activities

Threshold: Would implementation of the Project result in adverse impacts due to construction activities?

Findings: Less-than-significant impact. (Draft EIR, pp. 3.15-26 through 3.15-27.)

Explanation: Construction activities associated with the Project would include use of construction equipment, including vehicles removing or delivering fill material, bulldozers, and other heavy machinery, as well as building materials delivery, and construction worker commutes. The transport of heavy construction equipment to the site, haul truck trips, and construction worker commutes could affect the local roadway network.

The City of Dixon Construction Specifications (21-02) state that, if required by the City Engineer, a Traffic Control Plan (TCP) shall be provided to the City and approved by the City Engineer prior to installation of construction signs or beginning of construction work within the City street right- of-way. The plan shall ensure that safe and efficient movement of traffic through the construction work zone(s) is maintained. The City of Dixon Engineering Standards and Specifications require the following:

1. Public safety and traffic control shall be provided in accordance with the Standard Specifications and as directed by the City Engineer. Safe vehicular and pedestrian access shall be provided at all times during construction.
2. When street work or trenching is done that would interfere with emergency response traffic, the Contractor shall obtain an Encroachment Permit from the City of Dixon, submit a traffic control plan, and notify the Fire and Police Departments 24-hours in advance of the time and location of such closures. The Contractor shall again contact these departments as soon as the street is reopened.
3. Unless specifically set forth in the Special Provisions, all marked lanes of traffic shall be open on all major streets in each direction during the peak traffic hours of 7:00 am to 8:00 am and 3:00 pm to 5:00 pm. A traffic lane shall be considered open if it is surfaced with asphalt and is at least 10 feet wide.
4. Whenever a work zone is within 10 feet of a traffic lane and there is a pavement cut, ditch, or trench greater than 2 inches deep, the Contractor shall maintain continuous barricades spaced at approximately 50-foot intervals. If the cut, ditch, or trench is more than 10 feet from a travel lane, the spacing may be greater, but not to exceed 200 feet.

5. Prior to ordering street name signs, the Contractor shall verify street names and street sign specifications with the City Engineer.
6. The Contractor shall remove, temporarily relocate, and reinstall all public signs, private signs and mailboxes in conflict with the construction. Mailbox locations shall be as approved by the United States Postal Department. Public sign relocation shall be coordinated with the sign owners and the City of Dixon.

Based on the assumed implementation of an approved TCP, the project impact is less than significant on construction operations. (Draft EIR, pp. 3.15-26 through 3.15-27.)

L. UTILITIES AND SERVICE SYSTEMS

1. Wastewater

Threshold: Would the Project result in a determination by the wastewater treatment and/or collection provider which serves the project that the provider does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Findings: Less-than-significant impact. (Draft EIR, p. 3.16-7)

Explanation: According to the Sewer Study prepared for the Project, as shown in in Appendix D, based on the proposed land use, the Project is anticipated to generate a total design sanitary sewer flow of 1.0 MGD. A sanitary sewer main is proposed to route sewer flows from the project site and adjacent industrial parcels southward to the existing 21" sewer main in Fitzgerald Drive, where it well be carried to the existing wastewater treatment plant south of the city. The WWTF maintains the average daily dry weather flow limit of 1.82 MGD based on the treatment, storage, and disposal capacity of the WWTF and Maximum Monthly Average Flow of 2.0 MGD. Furthermore, the allocation of capacity for the City of Dixon's Northeast Quadrant Specific Plan (NEQSP) was approximately 2.85 MGD. As mentioned in the environmental setting, Phase 1 of the WWTF upgrade increased the AAF capacity of the WWTF to 1.9 MGD and was constructed on four acres in a 14-acre site at the north edge of the original WWTF, which covered 430 acres. The Phase 1 upgrade/expansion was designed so that the WWTF can be further expanded to an AAF capacity of 2.5 MGD. In total, the average annual influent flow has been less than 1.3 MGD. With the addition of the Project, the average annual influent flow is anticipated to be 2.3 MGD. The City has additional land (in the 14-acre site) that could be used to further expand the WWTF beyond 2.5 MGD without reducing the area used for land application. Additionally, the City collects wastewater rates and impact fees to fund the operation, maintenance, and expansion of the collection system and WWTF. Furthermore, the City must also periodically review and update their Wastewater and Sewer Master Plans, and as growth continues to occur within the Planning Area, the City will identify necessary system upgrades and capacity enhancements to meet growth.

The development of the Project under this permitted option would not exceed the wastewater discharge requirements in the WDR Order. Therefore, the Project would have a less than significant impact relative to this wastewater treatment capacity. (Draft EIR, p. 3.16-7)

2. Wastewater Treatment or Collection Facilities

Threshold: Would the Project would not result in the construction of new wastewater treatment or collection facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Findings: Less-than-significant impact. (Draft EIR, pp. 3.16-8 through 3.16-9.)

Explanation: The wastewater collection and conveyance system that will serve the Project will consist of engineered infrastructure consistent with the City's existing infrastructure requirements. A sanitary sewer main is proposed to route sewer flows from the project site and adjacent industrial parcels. The sanitary sewer trunk main will run from the north boundary line of the project site southward within the future Professional Drive right-of-way. The proposed sewer main will continue southward along Professional Drive and tie into the existing 21-inch sewer main in Fitzgerald Way, where it will be carried to the existing wastewater treatment plant south of the city.

New wastewater collection and conveyance infrastructure needed for the Project will require trenching/excavation of earth, and placement of pipe within the trenches at specific locations, elevations, and gradients. Utility lines within the Project site and adjacent roadways would be extended throughout the project site. The wastewater collection/conveyance infrastructure design will be required to be reviewed by the Public Works Department to ensure consistency with the City's engineering standards through the improvement plan process. This improvement plan process will include full engineering design (i.e., location, depth, slope, etc.) of all conveyance infrastructure as well as a review of new sewer pump stations and new force mains if needed. Ultimately, the sanitary sewer collection system will be an underground collection system installed as per the City of Dixon standards and specifications. Sanitary sewer disposal and treatment will be to the City of Dixon WWTF.

According to the Sewer Study prepared for the proposed project, as shown in in Appendix K, based on the proposed land use, the Project is anticipated to generate a total design sanitary sewer flow of 1.0 MGD. A sanitary sewer main is proposed to route sewer flows from the project site and adjacent industrial parcels southward to the existing 21" sewer main in Fitzgerald Drive, where it well be carried to the existing wastewater treatment plant south of the city. The WWTF maintains the average daily dry weather flow limit of 1.82 MGD based on the treatment, storage, and disposal capacity of the WWTF and Maximum Monthly Average Flow of 2.0 MGD. Furthermore, the allocation of capacity for the City of Dixon's Northeast Quadrant Specific Plan (NEQSP) was approximately 2.85 MGD. As mentioned in the environmental setting, Phase 1 of the WWTF upgrade increased the AAF capacity of the WWTF to 1.9 MGD and was constructed on four acres in a 14-acre site at the north edge of the original WWTF, which covered 430 acres. The Phase 1 upgrade/expansion was designed so that the WWTF can be further expanded to an AAF capacity of 2.5 MGD. In total, the average annual influent flow has been less than 1.3 MGD. With the addition of the Project, the average annual influent flow is anticipated to be 2.3 MGD. As of 2014, the flows to the WWTF were approximately 1.2 MGD (City of Dixon, 2014). The City has additional land (in the 14-acre site) that could be used to further expand the WWTF beyond 2.5 MGD without reducing the area used for land application. Additionally, the City collects wastewater rates and impact fees to fund the operation, maintenance, and expansion of the collection system and WWTF. Furthermore, the City must also periodically review and update their Wastewater and Sewer Master Plans, and as growth continues to occur within the Planning Area, the City will identify necessary system upgrades and capacity enhancements to meet growth.

The City of Dixon WWTF has the capacity to treat and dispose of the proposed 1.0 MGD (PWWF) increase in flows from the Project although the wastewater treatment plant would require upgrades or improvements in order to serve the Project, this would not cause additional significant environmental effects due to the Project, as such potential improvements have already been planned for. Therefore, implementation of the Project would have a less-than-significant impact relative to this topic. (Draft EIR, pp. 3.16-8 through 3.16-9.)

3. Water Treatment Facilities

Threshold: Would the Project not require construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Findings: Less-than-significant impact. (Draft EIR, pp. 3.16-20 through 3.16-21.)

Explanation: The provision of public services and the construction of onsite infrastructure improvements will be required to accommodate the development of the proposed Project. Water distribution will be by an underground distribution system to be installed as per the City of Dixon standards and specifications.

The Project would require extension of offsite water conveyance infrastructure to the Project site for potable water and irrigation water. All offsite water utility improvements will be in or adjacent to existing roadways along the perimeter of the Project site, thereby limiting any potential impact to areas that were not already disturbed.

The Project would also require the construction of new onsite water conveyance infrastructure for potable water and irrigation water. All onsite water utility improvements will be within existing agricultural lands, the impacts of which are discussed in Section 3.2, Agricultural Resources. Construction of the onsite potable water infrastructure would not have the potential to induce growth beyond what is proposed because the infrastructure is not oversized to accommodate additional projects or growth.

The City of Dixon Water System Master Plan (WSMP) by West Yost Associates determined the existing conditions of the Dixon water system at the end of 2016 and recommended water system improvements to meet the needs future development. The City of Dixon's existing water system is broken up into three zones, the North, South and Core Zones and the Zones are hydraulically connected to each other. The Campus site lies within the North Zone. The Dixon water system relies completely on groundwater wells. The city has three existing wells, one of which is a standby well for the City, and two storage tanks serving the Core and North Zone service areas. The total capacity of the two operational wells is 3,300 gallons per minute and the total usable volume of the tanks is 1.8 million gallons. Two existing booster pump stations serve the Core and North Zones. Existing 12" water pipelines exist south-west of the project site in East Dorset Drive and to the south of the project in Vaughn Road.

The WSMP proposes construction of a new 1,500 gallon per minute well in the Northeast Quadrant (North Zone) by 2030. In future buildout conditions, an additional well and 0.26 MG of useable storage are proposed within the Northeast Quadrant (North Zone). Construction of a new 1,500 gpm well is proposed as part of Project and will be located in the northwest portion of the site. The proposed well site can accommodate a future storage tank and an additional well will be constructed within the Northeast Quadrant in future build-out conditions when deemed necessary by the City of Dixon. The future second well site will tentatively be located at the northeast edge of the specific plan.

The Project, if approved by the City, is capable of being served by the City from the City's existing and future portfolio of water supplies. The water supply for the Project will have the same water supply reliability and water quality as the water supply available to each of the City's other existing and future water customers.

The Project would not require the construction of new water treatment facilities or expansion of existing water treatment facilities for water service. Implementation of the Project would have a less-than-significant impact relative to this topic. (Draft EIR, pp. 3.16-20 through 3.16-21.)

4. Water Supply

Threshold: Would the Project have sufficient water supplies available to serve the Project from existing entitlements and resources?

Findings: Less-than-significant impact. (Draft EIR, pp. 3.16-22 through 3.16-24.)

Explanation:

Proposed Water Supply for the Project

Water demands for the Project will be served using the City's existing and future portfolio of water supplies. As discussed above, the City operates a total of five groundwater wells, which have a total capacity of about 8,500 gpm (12.2 MGD or 13,700 AFY). For planning purposes, the City assumes a firm water supply calculated as the total supply available with the largest well out of service. The City's existing firm water supply is 4,200 gpm (6.0 MGD or 6,800 AFY). The WSMP recommends four additional wells be constructed to meet the buildout demand projections. The total buildout supply capacity with the recommended new wells is projected to be 14,500 gallons per minute (gpm) (20.8 MGD or 23,400 AFY) with the firm supply capacity (assuming the largest well out of service) to be 12,000 gpm (17.3 MGD or 19,400 AFY).

In order to fulfill the recommendations of the WSMP and Policy PSF.2.3 of the General Plan (which requires the City to improve the reliability of the City's Water system to meet future demand, including through the construction of additional wells), the Project will provide a 1,500 gallon per minute well in the northwest corner of the Project as well extend the City of Dixon's water system northeastward with connections in East Dorset Drive and Vaughn Road. The proposed well site can accommodate a future storage tank and an additional well will be constructed within the Northeast Quadrant in future build-out conditions when deemed necessary by the City of Dixon. In future buildout conditions, an additional well and 0.26 MG of useable storage are proposed within the Northeast Quadrant (North Zone). In addition to the proposed well, 12" water mains serving the site and the parcels north are proposed with two connections in East Dorset Drive and two connections in Vaughn Road.

Projected Water Demand for the Project

The projected water demands for buildout of the Project are 191 million gallons (MG) per year. Water demands for the Project were estimated based on unit water use factors from the City's 2016 WSMP. Consistent with the 2016 WSMP, demands for the Project include 14 percent of unaccounted-for water.

It is anticipated that the Project, if approved by the City, be served from the City's existing and future portfolio of water supplies. The City's existing and future supplies consist solely of groundwater pumped from City-owned and operated wells from the underlying Solano Groundwater Subbasin. Proponents of the Project will be responsible for funding and constructing the infrastructure required to deliver water supplies to the Project area. The inclusion of existing and planned future water supplies is specifically allowed by Water Code Section 16031(b).

Water use factors as presented in the City's 2016 WSMP were used to estimate the projected water demand for the Project. Table 3.16-8 summarizes the land uses and projected water demands for the Project.

Determination of Water Supply Sufficiency

Water Code section 10910 states: *10910(c)(4) If the city or county is required to comply with this part pursuant to subdivision (b), the water supply assessment for the project shall include a discussion with regard to whether the total projected water supplies, determined to be available by the city or county for the project during normal, single dry, and multiple dry water years during a 20 year projection, will meet the projected water demand associated with the Project, in addition to existing and planned future uses, including agricultural and manufacturing uses.*

Pursuant to Water Code section 10910(c)(4), and based on the technical analyses described in the Dixon 257 Water Supply Assessment, as shown in Appendix H, the City's projected water supplies are sufficient to meet existing and projected future water demands, including future water demands associated with the Project, over a 20-year period and under normal, single dry, and multiple dry years. To remain

conservative in planning, the City's 2020 UWMP assumes no reduction in water demand during dry years. However, water conservation and demand reduction methods detailed in the City's adopted Water Shortage Contingency Plan, included in Appendix F of the City's 2020 UWMP, are able to reduce demands by up to and greater than 50 percent under water supply shortage conditions and other emergencies.

The water demands for buildout of the Project are included in the projected water demands. Therefore, the City is able to serve the Project in addition to existing and planned developments with the existing and planned future water supplies. As identified above, the Project would not result in insufficient water supplies available to serve the Project from existing entitlements and resources. Therefore, the Project would result in a less-than-significant impact to water supplies. (Draft EIR, pp. 3.16-22 through 3.16-24.)

5. Stormwater Drainage

Threshold: Would the Project not have the potential to require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Findings: Less-than-significant impact. (Draft EIR, pp. 3.16-33 through 3.16-35.)

Explanation: The Project would convert approximately 260 acres of existing pervious agricultural land into mostly impervious urban uses. As part of the development, the site would include roadside landscaping, turf in the park and along paseos, and a retention basing to collect stormwater runoff.

The Project would increase impervious surface area, resulting in approximately 58 percent of the project site converting from pervious surfaces to impervious surfaces. Onsite storm drainage infrastructure would be installed to serve the Project. Development of the Project would include construction of a new storm drainage system, including a drainage retention pond and drainage channel. Onsite flows of the Project will be collected and conveyed through a storm drain system to the retention basin. The proposed retention basin has a volume of 255 acre-feet and is located near the south end of the Campus Project site. The retention basin would serve the Project site. If a future city-wide storm drainage solution is pursued, 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. Based on a preliminary long term infiltration rate of 4 inches per day, the required retention basin storage is approximately 255 acre-feet. The final design of the retention basin will require additional geotechnical investigations to determine the long-term infiltration rate. The retention basin will hold the runoff without a discharge to the DRCD facilities.

The new retention basin will retain the Project flows on-site without an off-site discharge. The existing flows will be routed around the Project site. The loss of existing flood storage on-site will not result in any increase of off-site flows or increase in downstream water surface elevations. This is mainly a result of removing 260 acres for the existing drainage shed area. If the basin is converted to a future detention basin, it will be constructed to maintain the post development 100-year 4-day flow rates to of the historic Dixon Regional Watershed Joint Powers Agreement peak flow rates of 0.011 cfs/acre. Due to topographical restraints, the detention basin would have a new storm drain pump station to fully drain the basin and to regulate the discharge. There would not be an increase in peak flow and water surface elevations upstream (Interstate 80) or downstream (Union Pacific Railroad) of the Project site.

All on-site storm drainage runoff will be collected through drain inlets and catch basins along the streets, and conveyed via surface swales and underground trunk lines to the retention pond. The proposed retention basin would be located at the south side of the site, adjacent to Pedrick Road. The proposed retention basin would provide approximately 255 acre-feet of storage with a design percolation rate of 4 inches per day. The retention basin is proposed to be approximately 30 feet deep and a minimum of 1-foot of freeboard. Construction of the proposed retention basin would prevent the Project from increasing peak

flow and water surface elevations upstream (Interstate 80) and downstream (Union Pacific Railroad) of the Project site.

The storm water drainage retention pond would be constructed to meet the City of Dixon Standards.

New development and redevelopment projects are required to comply with the State's permit requirements regarding stormwater runoff. The city references state permit requirements, City Engineering Standards, and California Stormwater Quality Association (CASQA) Stormwater Best Management Practices Development Handbook for reviewing development and redevelopment projects for compliance.

Per the City's Storm Drain Design Standards, storm drains shall be designed to convey flows from a 10-year storm, roadways shall be designed to convey flows from a 100-year storm, retention/detention ponds shall be designed to store flows from a 100-year, 4-day storm assuming 25% of the pond is utilized prior to the storm event, and open channels should be sized to accommodate flows from a 100-year storm with 1 foot of freeboard. The Project's storm drain system would be required to conform to the design criteria, standard plans and specifications and the inspection and testing procedures set forth in the applicable Engineering Standards and Specifications of the City of Dixon (Municipal Code Chapter 16.06). Thus, the proposed storm drainage collection and retention/detention system will be subject to the SWRCB and City of Dixon regulations, including: Dixon Municipal Code; Phase II, NPDES Permit Requirements; NPDES-MS4 Permit Requirements; and LID Guidelines.

Per the City of Dixon Engineering Design Standards, the storm drain system shall be designed to accommodate the 10-year storm event with the hydrologic grade line (HGL) at least 1.0-feet below the gutter flow line elevations. The existing flows will be routed around the project site. The loss of existing flood storage on-site will not result in any increase of off-site flows or increase in downstream water surface elevations. This is mainly a result of removing 260 acres for the existing drainage shed area. If the proposed retention basin is converted to a future detention basin, it will be constructed to maintain the post development 100-year 4-day flow rates to of the historic Dixon Regional Watershed Joint Powers Agreement peak flow rates of 0.011 cfs/acre.

Based on the Drainage Study, there will not be an increase in peak flow and water surface elevations upstream (Interstate 80) or downstream (Union Pacific Railroad) of the project site. Historic flows at the Pedrick Road Culvert will continue at the same rates as the predevelopment condition. No project drainage would be discharged offsite. As also noted within the Drainage Study, a Storm Water Pollution Prevention Plan (SWPPP) will be prepared in conformance with the State Water Resources Control Board's latest General Construction Permit Guidelines. The SWPPP will be implemented during the construction phases of the project. Therefore, with implementation of the drainage system as analyzed in the Drainage Study prepared for the Project and with the preparation of the SWPPP, drainage impacts would be less than significant. (Draft EIR, pp. 3.16-33 through 3.16-35.)

6. Solid Waste

Threshold: Would the landfills that serve the Project have sufficient permitted capacity to accommodate the Project's solid waste disposal needs, and the Project will comply with federal, State, and local statutes and regulations related to solid waste?

Findings: Less-than-significant impact. (Draft EIR, pp. 3.16-40 through 3.16-41.)

Explanation: The City of Dixon contracts with Recology, a private company, a private company, for solid waste collection and disposal. Based on the waste generation factors provided by CalRecycle, the

Project is expected to generate approximately 23,907.9 pounds per day of solid waste upon full buildout, which is equivalent to 10.8 tons per day; refer to Table 3.16-9.

Currently, the Recology Hay Road Landfill (48-AA-0002) has a permitted capacity of 2,400 tons per day, with an estimated total permitted capacity of 37,000,000 cubic yards. The total estimated remaining capacity used, as of 2024, was 30,433,000 cubic yards. The estimated closure date of the currently permitted facility is January 1st, 2077.

The Project would be required to comply with applicable State and local requirements including those pertaining to solid waste, construction waste diversion, and recycling. Furthermore, the addition of the volume of solid waste associated with the Project, approximately 10.8 tons per day, would not cause an exceedance of the landfill's remaining capacity. Therefore, the Project would not generate solid waste in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, or exceed any State or local standards associated with solid waste. This is a less than significant impact. (Draft EIR, pp. 3.16-40 through 3.16-41.)

SECTION 3. FINDINGS REGARDING ENVIRONMENTAL IMPACTS MITIGATED TO A LEVEL OF LESS THAN SIGNIFICANT

The City hereby finds that feasible mitigation measures have been identified in the EIR that will avoid or substantially lessen the following potentially significant environmental impacts to a level of less than significant. The potentially significant impacts, and the mitigation measures that will reduce them to a Less-than-significant impact level, are as follows:

A. AESTHETICS

1. Light or Glare

Threshold: Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Findings: Less than significant with mitigation incorporated. (Draft EIR, pp. 3.1-15 through 3.15-17.) Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects as identified in the EIR. (State CEQA Guidelines, § 15091(a)(1).)

Explanation: Implementation of the Project would introduce new sources of light and glare into the Project area. Potential sources of glare are anticipated to occur primarily from vehicular traffic accessing and departing the Project site, as well as from vehicles stationed within the Project area. In addition, glare may occur from building windows and reflective material surfaces of the DOC and other development within the Project site. However, parking for the proposed residential uses would primarily occur within enclosed garages and driveways, where the headlights of parked vehicles are focused on the residential structure. Headlights and windshields would be shielded by the proposed residential structures within the site. Additionally, the Project includes plans for extensive landscaping and open space areas throughout the site, which would provide visual screening and block potential windshield glare for sensitive receptors within the Project site. Residential structures placed along the boundaries of the Project site would provide visual screening and block potential windshield glare to areas surrounding the Project site. Proposed soundwalls along Pedrick Road, Commercial Drive, and Professional Drive would adequately shield adjacent residential uses from roadway light and glare. Headlights from cars accessing the Project site could cause glare along both existing and proposed new roadways, resulting in glare being visible to both onsite and offsite receptors. Uses predominately in the immediate vicinity of the Project site are industrial,

manufacturing, or commercial uses not considered to be sensitive receptors to light and glare. However, there is one existing residence within the vicinity of the Project site to the south on Vaughn Road that could be affected by glare resulting from the Project site.

The Project would introduce new sources of nighttime lighting to a site which currently does not have artificial lighting sources. The Project would include exterior light sources such as street lighting, security lighting on the sides of buildings, parking lot lighting for surface parking areas such as the DOC and commercial areas, lighting of public areas including parks and walkways lit signage at the entrances to the Project site and/or within the Project site. It is anticipated that the proposed multi-use path and paseos through the Linear Park would be lit at night for safety purposes. Proposed low- and medium-density residential uses that abut the Linear Park may be exposed to nighttime lighting associated with keeping walking paths lit.

Commercial uses and the DOC in the northern portion of the Project site would likely have lit parking areas that could be visible from the adjacent proposed medium- and high-density residential units. Medium- and large-sized evergreen trees would be planted along "Entrance A" to provide privacy and a visual buffer between the uses. Screening trees would also line internal roadways between the sidewalk and residential areas.

Although these light sources are typical of residential and commercial uses, they would be new sources of light on the Project site. Light sources from the proposed development may affect the surrounding areas by introducing nuisance light into the area and decreasing the visibility of nighttime skies. Additionally, onsite light sources may create light spillover impacts on surrounding areas. As mentioned above, the there is one existing residence within the vicinity of the Project site to the south on Vaughn Road that could be affected by light spillover resulting from the Project site.

All development associated with implementation of the Project would be regulated by the Dixon Municipal Code Sections 18.28.020 and 18.28.090, which contains standards for using lighting and building materials that do not produce glare. Section 18.23.170 of the Municipal Code discourages the use of shiny metallic roofing and building materials. In addition, the function of the City Design Review Commission, as identified in Section 18.23 of the Zoning Ordinance, is to review the location, design, and intensity of all exterior lighting of new development. The Zoning Ordinance also contains lighting standards for parking facilities, which requires illumination of parking areas to be directed away from abutting residential sites. The 2022 California Green Building Standards Code, adopted as Chapter 16.17 of the Dixon Municipal Code, includes a nonresidential mandatory light pollution reduction measure that establishes maximum allowable light and glare standards for outdoor lighting systems for new nonresidential projects (2022 California Green Building Standards Code, 5.106.8 Light pollution reduction). Light standards along roadways and in parking lots would be directed downward and shielded to prevent light spillage. Additionally, the General Plan policy E-1.7 requires industrial, light industrial, and agro-industrial development to meet light and glare performance standards in order to minimize impacts on established or proposed residential areas. Compliance with existing regulations and General Plan policies would ensure that light and glare generated by the Project would be minimized. However, the Project would introduce new sources of light and glare to a previously undeveloped site, and the impact would be potentially significant. (Draft EIR, pp. 3.1-15 through 3.15-17.)

> ***Mitigation Measure 3.1-3:*** *The Project applicant shall develop and implement a signage and lighting plan, as approved in the City's Site Plan and Design Review process, to ensure that all outdoor lighting associated with the Project is designed to minimize lighting that is misdirected, excessive, or unnecessary by requiring lighting for development to be directed downward and minimize spill-over onto adjacent properties.*

B. BIOLOGICAL RESOURCES

1. Special Status Species

Threshold: Implementation of the Project, with mitigation, would not result in direct or indirect effects on special-status bird species?

Findings: Less than significant with mitigation incorporated. (Draft EIR, pp. 3.4-30 through 3.4-37.). Changes or alterations have been required in, or incorporated into, the Project that avoid or substantially lessen the significant environmental effects as identified in the EIR. (State CEQA Guidelines, § 15091(a)(1).)

Explanation: Special-status birds that occur within the nine-quad region for the Project site include: tricolored blackbird, grasshopper sparrow, burrowing owl, Swainson's hawk, western snowy plover, great egret, California black rail, northern harrier, western yellow-billed cuckoo, white-tailed kite, and song sparrow ("Modesto" population). These species are discussed below:

Tricolored Blackbird: Tricolored blackbirds (Agelaius tricolor) are listed as Threatened by CDFW. Tricolored blackbirds nest and seek cover in emergent wetland vegetation and thorny vegetation such as Himalayan blackberry (Rubus armeniacus), cattail (Typha spp.), willow (Salix spp.), and tules (Scirpus spp.). The nesting area must be large enough to support a minimum colony of 50 pairs as they are a highly colonial species. As many as 30,000 nests have been recorded in cattail marshes of four hectares or less. This species forages on the ground in croplands, grasslands, flooded land, and edges of ponds for insects. The basic requirements for selecting breeding sites are open accessible water, a protected nesting substrate, including either flooded or thorny or spiny vegetation, and a suitable foraging space providing adequate insect prey within a few miles of the nesting colony.

Tricolored blackbird may forage in the Project site; however, the Project site does not contain suitable nesting habitat for this species. Emergent wetland vegetation and other substrates suitable for nesting do not occur in the Project site. Although suitable nesting habitat is absent, this species may forage within the cropland in the Project site. Suitable breeding sites may also be within a few miles of the Project site and tricolored blackbirds are known to forage in areas a few miles away from a nesting colony. There is one documented occurrence of this species within five miles of the Project site, approximately 4.88 miles away. Based on suitable foraging habitat in the Project site and nearby documented occurrences, tricolored blackbird may occur in the Project site.

Grasshopper Sparrow: Grasshopper sparrows (Ammodramus savannarum) are listed by CDFW as a species of special concern due to declining populations in the Great Central Valley of California. They prefer open grasslands with barren ground for foraging, and tend to be found in areas with vegetation and scrub cover especially in grasslands and prairies. There are no CNDDB records within five miles of the Project site.

Suitable nesting or foraging habitat for this species is not present in the Project site.

Burrowing Owl: Burrowing owl (Athene cunicularia) is a ground nesting raptor species that is afforded protection by CDFW as a species of special concern due to declining populations in the Great Central Valley of California. This species occurs in a variety of open habitats, typically grasslands, desert scrub, agricultural fields, washes, and disturbed areas such as golf courses or vacant lots. Burrows, perch sites, and friable soil are necessary for this species, and areas with low-lying, sparse vegetation are preferred. Burrowing owls may utilize culverts, abandoned pipes, rubble piles, and other artificial structures for nesting if burrows are absent. They are often associated with high densities of burrowing mammals such

as prairie dogs and ground squirrels. Breeding pairs stay near a dedicated nesting burrow, while wintering owls may move around and may roost in tufts of vegetation rather than in burrows.

The entire Project site provides suitable habitat for this species. Ground squirrel (Otospermophilus beecheyi) burrows were observed within the Project site that provide suitable nesting/refuge habitat, and rubble piles, culverts, and other artificial structures that may also be suitable for this species are also within the Project site. Burrowing owl may forage throughout the Project site and this species is known to occupy agricultural habitats. There are thirteen documented occurrences of this species within five miles of the Project site, with the closest approximately 375 feet from the Project site. One adult and two juveniles were observed at this location indicating it was likely a nesting burrow. Based on suitable habitat in the Project site and the number and proximity of nearby documented occurrences, burrowing owl has a high potential to occur in the Project site. No sign of burrowing owl presence (pellets, whitewash, feathers etc.) was observed in the Project site during the field surveys.

Swainson's Hawk: Swainson's hawk (Buteo swainsoni) is a raptor species currently listed as threatened in California by the CDFW. This species is a long-distance migrant with nesting grounds in western North America, and wintering grounds in Mexico and South America. Swainson's hawks typically arrive in the California Central Valley between March and early April to establish breeding territories. Breeding occurs from late March to August, peaking in late May through July (Zeiner et al. 1988-1990). In the Central Valley, Swainson's hawks generally nest in isolated trees, small groves of trees in agricultural land, or in large woodlands next to open grasslands or agricultural fields. This species typically nests near riparian areas; however, it has been known to nest in urban areas as well. In the Central Valley, the most commonly used trees include Fremont's cottonwood (Populus fremontii), sycamores (Platanus spp.), valley oaks (Quercus lobata), walnut (Juglans spp.), and occasionally gum trees (Eucalyptus spp.), redwood (Sequoia spp.) and pine (Pinus spp.) (Woodbridge 1998). Nest locations are usually in close proximity to suitable foraging habitats, which include fallow fields, all types of grasslands, irrigated pastures, alfalfa and other hay crops, and low-growing row crops, especially post-harvest when the height of the vegetation is short and easy to observe prey. Swainson's hawks leave their breeding grounds to return to their wintering grounds in late August or early September.

The entire Project site, including off-site improvement areas (279.76 acres, including 261.19 acres of cropland, 17.43 acres of developed/disturbed areas, and 1.14 acres of ditches) provide suitable foraging habitat for this species and suitable nest trees are located adjacent to the Project site and in the surrounding vicinity. There are 143 documented occurrences of this species within five miles of the Project site, and two of those occurrences overlap with the Project site. These two occurrences are documented nest trees from 2005 and 2006. Based on suitable habitat in the Project site and the number and proximity of nearby documented occurrences, Swainson's hawk has a high potential to occur on the Project site. However, it should be noted that if tall-growing crops such as corn are planted within the Project site, the portion of the Project site that is planted with corn may be unsuitable for Swainson's hawk foraging. Once the crops reach a certain height, foraging opportunities are minimal for this species. Swainson's hawk can forage in a variety of agricultural settings, including early-stage corn fields, but tall, dense vegetation/crops are typically unsuitable for foraging by this species.

Western Snowy Plover: The western snowy plover (Charadrius alexandrinus nivosus) is a federally threatened bird listed by CDFW as a species of special concern. This ground nester is associated with beaches, salt pond levees and shores of large alkali lakes with friable sandy or gravelly soils.

Suitable habitat for this species does not occur in the Project site. As such, this species will not occur on-site.

Great Egret: Great egret (Ardea alba) is protected by the MBTA. These species are colonial nesters who inhabit large trees. Rookery sites for this species are typically located near marshes, tide-flats, irrigated pastures, and margins of rivers and lakes.

There is no suitable rookery habitat within the Project site. This species could occur while foraging but because rookery habitat is absent from the Project site, it is not anticipated to be impacted by the Project.

California Black Rail: California black rail (Laterallus jamaicensis coturniculus) is a State Threatened and Fully Protected species. This species inhabits freshwater marshes, wet meadows and shallow margins of saltwater marshes bordering larger bays and requires water depths of about one inch that do not fluctuate during the year and dense vegetation for nesting habitat.

Marsh habitat does not occur in the Project site, and the Project site is outside of the current known range of this species. As such, this species will not occur on-site.

Northern Harrier: Northern harrier (Circus cyaneus) is listed by CDFW as a species of special concern. This species occurs in a variety of open habitats; typically, large tracts of coastal scrub, grasslands, marsh, riparian scrub, and wetland habitats with low, dense vegetation. This species is also known to occur in agricultural habitats. The northern harrier builds a nest on the ground in thick, emergent wetland vegetation usually at the edge of aquatic habitat.

Northern harrier may forage in the Project site; however, the Project site does not contain suitable nesting habitat for this species. Emergent wetland vegetation does not occur in the Project site and aquatic habitat is also absent. Although suitable nesting habitat is absent, this species may forage within the cropland in the Project site and two northern harriers were observed foraging within the Project site during the field survey on February 14, 2023. There are no documented occurrences of this species within five miles of the Project site; however, this species is not regularly reported to the CNDDB. Based on suitable foraging habitat in the Project site and observations of this species foraging in the Project site, northern harrier is present in the Project site.

Western Yellow-Billed Cuckoo: The western yellow-billed cuckoo (Coccyzus americanus occidentalis) is a federally threatened and California endangered species. This riparian forest nester is found along the broad, lower flood-bottoms of larger river systems. They nest in riparian jungles of willow, often mixed with cottonwoods, with lower stories of blackberry, nettles, or wild grape.

Riparian forest habitat does not occur in or near the Project site. As such, this species will not occur on-site.

White-Tailed Kite: White-tailed kite (Elanus leucurus) is a CDFW fully protected species. This species occurs in a variety of open habitats including grasslands, savannah, oak woodland, riparian woodland, open suburban areas, and agriculture fields. Nesting generally occurs within riparian or edge habitats or in lone trees that are adjacent to foraging habitat. Foraging habitat consists of a variety of open habitats that contain a high rodent population; especially grasslands, pastures, alfalfa fields, and other agricultural crops/fields.

The entire Project site provides suitable foraging habitat for this species and suitable nest trees are located adjacent to the Project site and in the surrounding vicinity. There is one documented occurrence of this species within five miles of the Project site, approximately 4.58 miles away. However, this species is not typically reported to the CNDDB, and it is a common species in the area. Based on suitable habitat in the Project site and nearby documented occurrences, white-tailed kite has a high potential to occur in the Project site. However, it should be noted that if tall-growing crops such as corn are planted within the

Project site, that area of Project site may be unsuitable for foraging once the crops reach a certain height that limits the success of foraging. White-tailed kites can forage in a variety of agricultural settings, including early-stage corn fields, but tall, dense vegetation/crops are typically unsuitable for foraging by this species.

Song Sparrow ("Modesto" Population): The song sparrow ("Modesto" population) (Melospiza melodia) is a CDFW species of special concern. This species is found in emergent freshwater marshes dominated by tules and cattails as well as riparian willow thickets. They nest in riparian forests of valley oak with a sufficient understory of blackberry, along vegetated irrigation canals and levees, and in recently planted valley oak restoration sites.

The Project site does not contain dense, emergent vegetation and lacks suitable aquatic habitats. This species may pass through the Project site but is not expected to be impacted by the Project due to a lack of suitable nesting habitat.

Other Nesting Migratory Birds and Raptors: Migratory birds are protected under the MBTA of 1918 (16 U.S.C. 703-711). The MBTA makes it unlawful to take, possess, buy, sell, purchase, or barter any migratory bird listed under 50 CFR 10; this also includes feathers or other parts, nests, eggs, or products, except as allowed by implementing regulations (50 CFR 21). Additionally, Section 3503 of the California Fish and Game Code states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird. Section 3503.5 specifically states that it is unlawful to take, possess, or destroy any raptors (i.e., hawks, owls, eagles, and falcons), including their nests or eggs; and Section 3513 specifically states that it is unlawful to take or possess any migratory nongame bird as designated in the MBTA or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the MBTA.

A number of migratory birds and raptors have the potential to nest in or adjacent to the Project site. Suitable nest locations within and adjacent to the Project site include trees, grass, artificial structures, and bare ground.

Conclusion: As noted previously, the entire Project site contains 279.76 acres of cropland habitat, 17.43 acres of developed/disturbed habitat, and 1.14 acres of ditches (which include all roadway infrastructure extensions). The Project is expected to result in permanent impacts to the entire Project site. Figure 3.4-3 shows impacts to biological communities.

Implementation of Mitigation Measures 3.4-4(a) through 3.4-4(ef) would ensure that measures to avoid or minimize impacts on tricolored blackbird (*Agelaius tricolor*), burrowing owl (*Athene cunicularia*), Swainson's hawk (*Buteo swainsoni*), white-tailed kite (*Elanus leucurus*), northern harrier (*Circus hudsonius*), and a number of migratory birds and raptors are implemented. For example, Mitigation Measure 3.4-4(a) requires site surveys for burrowing owls and avoidance, minimization, and mitigation methodologies outlined in the CDFW's Staff Report on Burrowing Owl Mitigation should active burrows be detected during surveys. Mitigation Measure 3.4-4(b) requires permanent preservation of burrowing owl nesting sites if the Project impacts an unoccupied burrowing owl burrow or burrow surrogate, or occupied burrow. Mitigation Measure 3.4-4(c) requires conservation easements to mitigate for impacts to potential Swainson's hawk foraging habitat with in-kind habitat at a minimum 1:1 ratio which equally benefits burrowing owl foraging habitat. Mitigation Measure 3.4-4(d) requires capped or covered pipes, culverts, hoses or similar materials greater than two inches during construction in order to prevent burrowing owl sheltering or nesting. Mitigation Measure 3.4-4(e) requires site surveys for Swainson's hawk and measures should nests be found during surveys. This measure also requires mitigation for impacts to Swainson's hawk foraging habitat depending on the distance from any active nests. Mitigation Measure 3.4-4(f) requires site surveys for other protected birds if construction occurs within the nesting bird season.

These mitigation measures would reduce the potential for impacts to special-status bird species to a Less-than-significant impact level. (Draft EIR, pp. 3.4-30 through 3.4-37.)

Mitigation Measure 3.4-4(a): *A qualified biologist shall conduct surveys following the Department of Fish and Game Staff Report on Burrowing Owl Mitigation (2012) methodology (*https://wildlife.ca.gov/Conservation/Survey-Protocols#377281284- *birds) and prepare a report documenting the survey results. Surveys for nesting burrowing owl shall be conducted if Project construction starts during nesting season (February 1 to August 31), and surveys for wintering burrowing owl shall be conducted if the construction starts during the wintering season (September 1 to January 31). The surveys shall encompass the Project site and a sufficient buffer zone to detect owls nearby that may be impacted, which is up to 500 meters (1,640 feet), to the extent access to off-site properties is allowed, around the Project site pursuant to the above methodology. Surveys shall occur each year of Project construction, as conditions may change annually and suitable refugia for burrowing owl, such as small mammal burrows, can be created within a few hours or days, unless otherwise approved in writing by CDFW.*

Time lapses between surveys or Project activities shall trigger subsequent surveys including, but not limited to, a final survey within 24 hours prior to ground disturbance. The qualified biologist shall have a minimum of two years of experience implementing the above methodology resulting in burrowing owl detections. The Project shall immediately notify CDFW if burrowing owl is detected and implement a construction avoidance buffer around any detected burrowing owl pursuant to the buffer distances outlined in the Department of Fish and Game Staff Report on Burrowing Owl Mitigation (2012), which may be up to 500 meters (1,640 feet) to the extent access to off-site properties is allowed. Any detected owl shall be monitored by the qualified biologist to ensure it is not disturbed during construction activities, unless otherwise approved in writing by CDFW. Impacts to nesting burrowing owl shall be fully avoided.

Mitigation Measure 3.4-4(b): *If the Project would impact an unoccupied nesting burrowing owl burrow or burrow surrogate (i.e., a burrow known to have been used in the past three years for nesting), or an occupied burrow (where a non-nesting owl would be evicted as described below), the following habitat mitigation shall be implemented prior to Project construction. Impacts to each burrowing owl nesting site shall be mitigated by permanent preservation of two burrowing owl occupied nesting sites with appropriate foraging habitat within Solano County, unless otherwise approved by CDFW, through a conservation easement and implementing and funding a long-term management plan in perpetuity. The same requirements shall apply for impacts to non-nesting evicted owl sites except two burrowing owl occupied non-nesting (i.e., wintering) sites shall be preserved. The Project may implement alternative methods for preserving habitat with written acceptance from CDFW.*

Mitigation Measure 3.4-4(c): *The applicant has contracted to acquire conservation easements to mitigate for impacts to potential Swainson's hawk foraging habitat with in-kind habitat at a minimum 1:1 ratio which equally benefits burrowing owl foraging as establishing a conservation easement over irrigated pasture land will provide wintering and foraging habitat for burrowing owl. The Project site contains 261.19 acres of cropland habitats which provide suitable foraging habitat for Swainson's hawks. Impacts to suitable foraging habitat for Swainson's hawk will be mitigated at a minimum 1:1 ratio (one acre of foraging habitat preserved for each acre of development). Other species known to benefit from this habitat type include: tricolored blackbird, white-tailed kite, northern harrier, yellow-billed magpie, burrowing owl, and migratory birds and raptors.*

Mitigation Measure 3.4-4(d): *To prevent burrowing owl from sheltering or nesting in exposed*

material; all construction pipes, culverts, hoses or similar materials greater than two inches in diameter stored at the Project site shall be capped or covered before the end of each work day and shall be inspected thoroughly for wildlife before the pipe or similar structure is buried, capped, used, or moved.

Mitigation Measure 3.4-4(g): *The project proponent shall implement the following measures to avoid or minimize impacts on Swainson's hawk:*

- *If construction activities will begin during the Swainson's hawk nesting season (March 20 to September 15), prior to beginning work on the Project, a qualified biologist ~~should~~ shall conduct at least the minimum number of surveys called for within at least two survey periods prior to the initiation of construction in accordance with the Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley (Swainson's Hawk Technical Advisory Committee 2000) or the current CDFW-approved protocol and prepare a report documenting the survey results. Current survey periods specified by the Guidelines are March 20 to April 5, April 5 to April 20, April 21 to June 10, and June 10 to July 30. All potential nest trees within 0.5-mile of the Project footprint ~~should~~ shall be visually examined for potential Swainson's hawk nests, as accessible.*
- *If no active Swainson's hawk nests are identified on or within 0.5-mile of the Project, a letter report documenting the survey methodology and findings ~~should~~ shall be submitted to the Project proponent and no additional mitigation measures are recommended.*
- *If active Swainson's hawk nests (a nest becomes active once the first egg is laid and remains active until the fledged young are no longer dependent on the nest [USFWS 2018]) are found within 0.5-mile of the Project footprint, a survey report ~~should~~ shall be submitted to CDFW, and an avoidance and minimization plan shall be developed for approval by CDFW prior to the start of construction. The avoidance plan shall identify measures to minimize impacts to the active Swainson's hawk nest depending on the location of the nest relative to the project footprint. These measures may include:*
    - *Conduct a worker awareness training program prior to the start of construction;*
    - *Establish a buffer zone and work schedule to avoid impacting the nest during critical periods. ~~If possible, no~~ No work will occur within 200 yards of the nest while it is in active use. If work will occur within 200 yards of the nest, then construction will be monitored by a qualified biologist to ensure that no work occurs within 50 yards of the nest during incubation or within 10 days after hatching (Swainson's Hawk Technical Advisory Committee 2000);*
    - *Have a biological monitor conduct regular monitoring of the nest during construction activities; and*
    - *Should the project biologist determine that the construction activities are disturbing the nest; the biologist shall halt construction activities until the CDFW is consulted.*
- *The Project site, including off-site improvement areas, contains 279.76 acres of suitable foraging habitat for Swainson's hawks. CDFW has provided guidelines for mitigating impacts to Swainson's hawk foraging habitat as summarized below (CDFW 1994):*
    - *Projects within 1 mile of an active nest tree shall provide:*
        - *One acre of foraging habitat for each acre of development at a ratio of 1:1. Mitigated lands shall consist of 10 percent of the land requirements met by fee title acquisition or a conservation easement allowing for the active management of the habitat, and the remaining 90 percent of the land protected by a conservation*

easement on agricultural lands or other suitable habitats which provide foraging habitat for Swainson's hawk (grasslands, rangeland, etc.) and no requirements for active management of the habitat; or

- *One-half acre of foraging habitat for each acre of development authorized at a ratio of 0.5:1. All the land requirements shall be met by fee title acquisition or a conservation easement, which allows for the active management of the habitat for prey production on the land. Prey abundance and availability is determined by land and farming patterns including crop types, agricultural practices, and harvesting regimes. Actively managed land for prey production may result in the land becoming less valuable for crop production due to management limitations but increases the value for Swainson's hawk through functional lift.*

- *Projects within 5 miles of an active nest tree but greater than 1 mile from the nest tree shall provide 0.75 acre of foraging habitat for each acre of urban development at a ratio of 0.75:1. All foraging habitat may be protected through fee title acquisition or conservation easement on agricultural lands or other suitable habitats.*
- *Projects within 10 miles of an active nest tree but greater than 5 miles from an active nest tree shall provide 0.5 acre of Habitat Management land for each acre of urban development at a ratio of 0.5:1. All foraging habitat may be protected through fee title acquisition or a conservation easement on agricultural lands or other suitable habitat.*

Mitigation bank credits may also be used to satisfy Swainson's hawk mitigation requirements as approved by the City and CDFW.

Mitigation Measure 3.4-4(f): *The project proponent shall implement the following measure to avoid or minimize impacts on tricolored blackbird, northern harrier, white-tailed kite and other special-status birds and nesting migratory birds and raptors that may occur on the site:*

Active nests and nesting birds are protected by the California Fish and Game Code Sections 3503 and 3503.5, 3513 and the MBTA. Ground-disturbing and other development activities including grading, vegetation clearing, tree removal/trim, and construction could impact nesting birds if these activities occur during the nesting season (generally February 1 to August 31). To avoid impacts to nesting birds, all ground disturbing activity shall be completed between September 1 and January 31, if feasible. If construction cannot occur outside of the nesting season, the following measures are recommended:

- *If construction activities occur during the nesting season, a qualified biologist shall conduct a nesting bird survey to determine the presence of any active nests within the Project site. Additionally, the surrounding 500 feet of the Project site shall be surveyed for active ~~raptor~~ nests, where accessible. The nesting bird survey shall be conducted within 14 days prior to commencement of ground-disturbing or other development activities. If the nesting bird survey shows that there is no evidence of active nests, then a letter report shall be prepared to document the survey and be provided to the project proponent and no additional measures are recommended. If development does not commence within 14 days of the nesting bird survey, or halts for more than 14 days, then an additional survey is required prior to starting or resuming work within the nesting season.*
    - *If active nests are found, then the qualified biologist shall establish a species-specific buffer to prohibit development activities near the nest to and minimize nest disturbance*

until the young have successfully fledged or the biologist determines that the nest is no longer active. Buffer distances may range from ~~30~~ a minimum of 250 feet for some songbirds and 0.5 mile for some raptors. Nest monitoring may also be warranted during certain phases of construction to ensure nesting birds are not adversely impacted. If active nests are found within any trees slated for removal, then an appropriate buffer shall be established around the tree and all trees within the buffer shall not be removed until a qualified biologist determines that the nest has successfully fledged and/or is no longer active.

- *A qualified biologist shall conduct environmental awareness training that is given to all onsite personnel prior to the initiation of work.*
- *If construction occurs outside of the nesting bird season (September 1 to January 31) a nesting bird survey and environmental training for nesting birds would not be required.*

2. Wetland

Threshold: Implementation of the Project, with mitigation, would not adversely affect protected wetlands and jurisdictional waters ?

Findings: Less than significant with mitigation incorporated. (Draft EIR, pp. 3.4-39 through 3.4-41.) Changes or alterations have been required in, or incorporated into, the Project that avoid or substantially lessen the significant environmental effects as identified in the EIR. (State CEQA Guidelines, § 15091(a)(1).).)

Explanation: As part of the Aquatic Resources Delineation completed for the project, a total of 1.150 acres of ditches were identified with the Project site. Although these features have not been formally verified by the USACE, they are likely to be classified as a water of the U.S. and/or water of the State. A preliminary jurisdictional determination (SPK-2021-00634) was issued May 11, 2023 by the USACE for the Project. The preliminary jurisdictional determination states the 1.17 acres of ditches are considered potential jurisdictional aquatic resources ("waters of the United States") regulated under Section 404 of the Clean Water Act.

It is noted that the Aquatic Resources Delineation identifies features outside of the Project boundary. However, areas outside of the Project boundary are not included in this EIR analysis. A final jurisdictional determination will be made based on the Project boundary.

It is also noted that new criteria to determine the presence of a jurisdictional wetland waters of the U.S. were implemented June 22, 2020, requiring a hydrologic nexus to a USACE traditional navigable water, such as "by directly abutting or having regular surface water communication with jurisdictional waters". The mapped features do not meet any USACE jurisdictional criteria under the Navigable Waters Protection Rule because there are no jurisdictional riverine, limnic, or tidal waters present adjacent to the swale which share hydrologic connectivity. These features are subject to the interpretation and verification of the USACE Sacramento District Regulatory Division.

The preliminary jurisdictional status of these water features has been determined as part of the Aquatic Resources Delineation completed for the project. As noted above, the preliminary jurisdictional determination states the 1.17 acres of ditches are considered potential jurisdictional aquatic resources ("waters of the United States") regulated under Section 404 of the Clean Water Act. Therefore, this is a potentially significant impact.

Implementation of Mitigation Measures 3.4-7 requires that, prior to any activities that would result in discharge, fill, removal, or hydrologic interruption of any of the water features within the Project site, a formal wetland delineation be conducted and an approved jurisdictional determination be obtained from the USACE. Additionally, any impacts on jurisdictional features would be required to obtain the appropriate CWA Section 404 and or 401 permits.

The mitigation measure identified above would reduce the above identified impact related to protected wetlands and jurisdictional waters. With implementation of the above mitigation measure, this impact would be considered less than significant. (Draft EIR, pp. 3.4-39 through 3.4-41.)

Mitigation Measure 3.4-7: *The Project proponent shall implement the following measure to avoid or minimize impacts on potentially jurisdictional waters:*

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

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

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

3. Habitat Conservation Plan

Threshold: Implementation of the Project, with mitigation, would not result in conflicts with an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.?

Findings: Less than significant with mitigation incorporated. (Draft EIR, pp. 3.4-46 through 3.4-47.) Changes or alterations have been required in, or incorporated into, the Project that avoid or substantially lessen the significant environmental effects as identified in the EIR. (State CEQA Guidelines, § 15091(a)(1).)

Explanation: As noted previously, the Solano HCP is currently in the draft stages and is not a final document or plan as of April 2024. If the Solano HCP becomes final prior to Project initiation, the Project proponent may apply for coverage under the Solano HCP.

The proposed Solano HCP establishes a framework for complying with State and Federal endangered species regulations while accommodating future urban growth, development of infrastructure, and ongoing operations and maintenance activities associated with flood control, irrigation facilities, and other public infrastructure undertaken by or under the permitting authority/control of the Plan Participants within Solano County.

The possibility exists that the Solano HCP will be adopted prior to development of the first phase of the project. Should the Solano HCP be in place prior to development of any phase of the project, a potentially significant impact would result.

Implementation of Mitigation Measures 3.4-11 requires that, should the Solano HCP be adopted prior to initiation of any ground disturbing activities for any phase of development associated with the project, the Project shall be developed in accordance with the Solano HCP and the Programmatic Endangered Species Act Consultation issued by the U.S. Fish and Wildlife Service.

The mitigation measure identified above would reduce the above identified impact related to conflicts with an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. With implementation of the above mitigation measure, this impact would be considered less than significant. (Draft EIR, pp. 3.4-46 through 3.4-47.)

> ***Mitigation Measure 3.4-11:*** *Should the Solano Multispecies Habitat Conservation Plan (Solano HCP) be adopted prior to initiation of any ground disturbing activities for any phase of development associated with the project, the Project shall be developed in accordance with the Solano HCP and the Programmatic Endangered Species Act Consultation issued by the U.S. Fish and Wildlife Service. The Solano HCP is proposed to include avoidance and minimization measures as well as mitigation protocols for covered species and sensitive habitats. The City of Dixon is a voluntary participant in the proposed Solano HCP.*
>
> *The Project applicant, the City of Dixon, and a representative from the Solano HCP shall ensure that all mitigation/conservation requirements of the Solano HCP are adhered to prior to and during construction. To the extent there is duplication in mitigation for a given species, the requirements of the Solano HCP shall supersede. If this measure is implemented after adoption of the Solano HCP, the project proponent shall comply with all requirements of the Solano HCP.*

C. CULTURAL AND TRIBAL RESOURCES

1. Historical Resources

Threshold: Would the Project not, with mitigation, cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

Findings: Less-than-significant impact with mitigation incorporated. (Draft EIR, pp. 3.5-17 through 3.5-18.) Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects as identified in the EIR. (State CEQA Guidelines, § 15091(a)(1).)

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

Although no historic resources are known to occur within the Project site, there is a moderate to high potential of discovery of previously unknown historic resources during ground-disturbing activities. This is a potentially significant impact. Implementation of Mitigation Measures 3.5-1(a) and 3.5-1(b) would reduce potential impacts of the Project on inadvertently discovered archaeological resources to a Less-than-significant impact level by ensuring that any resources inadvertently discovered during construction would be evaluated for significance and treated appropriately in consultation with a culturally affiliated Native American tribe. (Draft EIR, pp. 3.5-17 through 3.5-18.)

> ***Mitigation Measure 3.5-1(a):*** *The Project proponent shall develop and implement an Archaeological Monitoring Program, whereby the Project proponents shall retain the services of an experienced archaeologist who will be present on-site to observe ground-disturbing activities requiring grubbing, grading, trenching, or excavation within defined Project areas. The Archaeological Monitor will be given access to inspect all ground surface and subsurface modifications, excavations, installations, equipment parking, and any other construction-related activities in the vicinity of the defined Project areas. These defined Project areas consist of the two (now filled-in) historic drainage areas, located in the northern and southern portions of the APE, and the graveled-over area, located within the central-western portion of the APE.*
>
> *The archaeological monitoring will consist of on-the-ground and close observation by an experienced archaeologist for any kind of archaeological or cultural remains that might be exposed during ground-disturbing construction activities. Construction activities will be monitored by following the construction equipment as it removes or modifies soils and vegetation, and may*

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

Mitigation Measure 3.5-1(b): *The Project proponent shall develop and implement a Worker Awareness Training Program, where all construction personnel involved in ground-disturbing activities shall be trained in the recognition of possible cultural resources and the protection of such resources. The training program will inform all construction personnel of the procedures to be followed upon the discovery of archaeological materials, including Native American artifacts. Construction personnel will be instructed that cultural resources must be avoided and that all travel and construction activity must be confined to designated roads and areas. The training will include a review of the local, state, and federal laws and regulations related to cultural resources, as well as instructions on the procedures to be implemented should unanticipated resources be encountered during construction, including stopping work in the vicinity of the find and contacting the appropriate environmental compliance specialist.*

2. Archaeological Resources

Threshold: Would the Project not, with mitigation, cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Findings: Less-than-significant impact impact with mitigation incorporated. (Draft EIR, page. 3.5-19.) Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects as identified in the EIR. (State CEQA Guidelines, § 15091(a)(1).)

Explanation: The findings of the Cultural Resources Assessment concluded that the Project site possesses a moderate to high potential to contain previously unrecorded prehistoric and/or historic era cultural resources. Areas of particular concern include the locations of two (now filled in) historic drainages, which run from west to east across the entire span of the Project site, and the gravel-covered area located within the western central portion of the Project site. The two drainages are highlighted as having a moderate to high potential to contain prehistoric resources through both the noted presence of significant prehistoric resources located along drainages found elsewhere in the Dixon area and project vicinity as well as the presence of two isolated finds (Dixon 257 Isolate 1 and 2) encountered within the western portion of the Project site's southern historic drainage during the pedestrian survey. The presence of these resources at the ground surface within the historic drainage points towards the possibility for additional prehistoric resources to be located beneath the ground surface.

As noted above, the Cultural Resources Assessment revealed the presence of three cultural resources within the project APE. Additionally, there is a moderate to high potential that the Project site would contain previously unrecorded prehistoric and/or historic era cultural resources. This is a potentially significant impact.

Implementation of Mitigation Measure 3.5-2 would reduce potential impacts of the Project on inadvertently discovered archaeological resources to a Less-than-significant impact level by ensuring that any resources inadvertently discovered during construction would be evaluated for significance and treated appropriately in consultation with a culturally affiliated Native American tribe. (Draft EIR, page. 3.5-19.)

Mitigation Measure 3.5-2: *Implement Mitigation Measures 3.5-1(a) and 3.5-1(b).*

3. Human Remains

Threshold: Would the Project not disturb any human remains, including those interred outside of dedicated cemeteries?

Findings: Less-than-significant impact with mitigation incorporated. (Draft EIR, pp. 3.5-19 through 3.5-20.) Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects as identified in the EIR. (State CEQA Guidelines, § 15091(a)(1).)

Explanation: No known human remains or cemeteries are located on the Project site. However, the records search performed as part of the Cultural Resources Assessment determined that large prehistoric villages with cemeteries and substantial buried components have been found in the past in the Dixon vicinity. Human remains that may occur outside of formal burial sites are difficult to predict and could be encountered during construction and excavation activities.

While there is no indication that the project area contains human remains, there is the potential for previously unknown human remains to be discovered during construction activities. If any previously unknown human remains are identified on the Project site, the impact would be potentially significant. Mitigation Measure 3.5-3 would reduce the potential impacts of the Project on inadvertently discovered human remains to a Less-than-significant impact level by determining if the remains are Native American in origin and, if determined to be Native American, a Most Likely Descendant is assigned to determine the treatment. (Draft EIR, pp. 3.5-19 through 3.5-20.)

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

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

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

responsibilities of the City for acting upon notification of a discovery of Native American human remains are identified in Public Resources Code Section 5097.9 et seq.

4. Tribal Cultural Resources

Threshold: The Project could cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); or is
- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Findings: Less-than-significant impact with mitigation incorporated. (Draft EIR, pp. 3.5-21 through 3.5-22.) Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects as identified in the EIR. (State CEQA Guidelines, § 15091(a)(1).)

Explanation: Prehistoric archaeological sites and isolates are tribal cultural resources; additionally, plants and other natural resources, as well as geographic locations can also be tribal cultural resources. Grading of original in situ soils could expose buried tribal cultural resources and features including sacred sites. Redevelopment and development of previously undeveloped areas have the potential to impact known and unknown tribal cultural and archaeological resources. Surface-level and subsurface archaeological sites and deposits can be affected by ground-disturbing activities associated with construction activities.

The Cultural Resource Assessment found no Native American sacred sites or human remains on the Project site. In accordance with requirements promulgated by SB 18 and AB 52, the City notified the Cachill Dehe Band of Wintun Indians of the Colusa Indian Community, Cortina Rancheria - Kletsel Dehe Band of Wintun Indians, and the Yocha Dehe Wintun Nation of the Project on May 30, 2023, and invited the tribes to participate in consultation (see Appendix N of this EIR). The Yocha Dehe Wintun Nation responded to the City on August 3, 2023. The Yocha Dehe Wintun Nation recommended the City to include cultural monitors during development and ground disturbance, cultural sensitivity training for any pre-project personnel, and incorporate Yocha Dehe Wintun Nation's Treatment Protocol into the mitigation measures for this project. The consultation was concluded on August 3, 2023. Based on information in the Cultural Resources Assessment and information provided by the Yocha Dehe Wintun Nation during consultation, there is a moderate to high potential of discovery of previously unknown tribal cultural resources during ground-disturbing activities. This is a potentially significant impact. Mitigation Measures 3.5-4(a) and 3.5-4(b) would reduce the potential impacts of the Project on inadvertently discovered tribal cultural resources to a Less-than-significant impact level by determining if the remains are Native American in origin and, if determined to be Native American, a Most Likely Descendant is assigned to determine the treatment. (Draft EIR, pp. 3.5-21 through 3.5-22.)

Mitigation Measure 3.5-4(a): *Implement Mitigation Measures 3.5-1(a), 3.5-1(b), 3.5-2, and 3.5-3.*

Mitigation Measure 3.5-4(b): *A tribal cultural resources awareness brochure and training program for all personnel involved in the project's ground disturbing activities (site grading, utility infrastructure installation, construction, etc.) shall be developed in coordination with interested Native American Tribes. The brochure shall be distributed and the training will be conducted by Native American representatives, or tribal monitors from culturally affiliated Native American Tribes, before any stages of project implementation and construction activities begin on the Project site. The training may be done in coordination with the project archaeologist. The program will include relevant information regarding sensitive tribal cultural resources, applicable regulations and protocols for avoidance, and consequences of violating state laws and regulations. The program will describe appropriate avoidance and minimization measures for resources that have the potential to be located on the Project site and will outline what to do and whom to contact if any potential tribal cultural resources or archaeological resources are encountered. The program will underscore the requirement for confidentiality and culturally appropriate treatment of any find with cultural significance to Native Americans' tribal values. All operators of ground-disturbing equipment shall receive the training and sign a form that acknowledges receipt of the training.*

D. GEOLOGY

1. Unique Paleontological Resource or Geologic Feature

Threshold: Implementation of the Project, with mitigation, would not or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Findings: Less-than-significant impact with mitigation incorporated. (Draft EIR, pp. 3.7-12 through 3.7-13.) Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects as identified in the EIR. (State CEQA Guidelines, § 15091(a)(1).)

Explanation: Implementation of The Campus project would provide for development and associated improvements that would involve construction activities such as grading, excavation, and other ground-disturbing activities with the potential to result in the accidental destruction or disturbance of paleontological resources. As discussed in the Dixon General Plan EIR, numerous paleontological resources have been discovered throughout the Sacramento Valley and Solano County regions, including Vacaville and Putah Creek, and while no paleontological resources have been discovered within the City, there is potential that resources could be found in the future.

The Project site is currently vacant/undeveloped, consisting primarily of farmland, and has undergone extensive previous grading. While the project is not anticipated to directly or indirectly impact previously undiscovered paleontological resources, there is the potential for project excavation activities to encounter paleontological resources. Therefore, the impact would be potentially significant.

If previously undiscovered paleontological resources are uncovered during ground disturbing activities, Mitigation Measure 3.7-5 would require all work within a 25-foot radius of the find to be suspended until the resource is evaluated by a professional vertebrate paleontologist. If the discovery proves to be significant, before construction activities resume at the location of the find, additional work such as data recovery excavation may be warranted, as deemed necessary by the paleontologist. Implementation of Mitigation Measure 3.7-5 would reduce the potential for impacts to paleontological resources to a Less-than-significant impact level.. (Draft EIR, pp. 3.7-12 through 3.7-13.)

Mitigation Measure 3.7-5: : *If fossils or fossil-bearing deposits are encountered during ground-disturbing activities, work within a 25-foot radius of the find shall halt, the Dixon Community Development Department shall be notified, and a professional vertebrate paleontologist (as defined*

by the Society for Vertebrate Paleontology) shall be contacted immediately to evaluate the find. The paleontologist shall have the authority to stop or divert construction, as necessary. Documentation and treatment of the discovery shall occur in accordance with Society of Vertebrate Paleontology standards. The significance of the find shall be evaluated pursuant to the CEQA Guidelines. If the discovery proves to be significant, before construction activities resume at the location of the find, additional work such as data recovery excavation may be warranted, as deemed necessary by the paleontologist.

E. LAND USE AND PLANNING

1. Habitat Conservation Plan or Natural Community Conservation Plan

Threshold: The Project would not conflict with an applicable habitat conservation plan or natural community conservation plan?

Findings: Less-than-significant impact with mitigation incorporated. (Draft EIR, pp. 3.11-28 through 3.11-29.) Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects as identified in the EIR. (State CEQA Guidelines, § 15091(a)(1).)

Explanation: As noted previously, the Solano HCP is currently in the draft stages and is not a final document or plan as of December 2023. If the Solano HCP becomes final prior to Project initiation, the Project proponent may apply for coverage under the Solano HCP.

The proposed Solano HCP establishes a framework for complying with State and Federal endangered species regulations while accommodating future urban growth, development of infrastructure, and ongoing operations and maintenance activities associated with flood control, irrigation facilities, and other public infrastructure undertaken by or under the permitting authority/control of the Plan Participants within Solano County.

The possibility exists that the Solano HCP will be adopted prior to development of the first phase of the project. If this were to occur prior to initiation of any ground disturbing activities for any phase of development associated with the Project, the Project could be in conflict with a habitat conservation plan. Therefore, the impact is potentially significant.

Implementation of Mitigation Measure 3.11-3 requires that, should the Solano HCP be adopted prior to initiation of any ground disturbing activities for any phase of development associated with the Project, the Project shall be developed in accordance with the Solano HCP and the Programmatic Endangered Species Act Consultation issued by the U.S. Fish and Wildlife Service. Therefore, the Project would not conflict with a habitat conservation plan or natural community conservation plan. (Draft EIR, pp. 3.11-28 through 3.11-29.)

Mitigation Measure 3.11-3: *Implement Mitigation Measures 3.4-11.*

SECTION 4. FINDINGS REGARDING ENVIRONMENTAL IMPACTS NOT FULLY MITIGATED TO A LEVEL OF LESS THAN SIGNIFICANT

The City hereby finds that, despite the incorporation of mitigation measures outlined in the EIR and in this Resolution, the following impacts from the Project and related approvals cannot be fully mitigated to a less-than-significant impact level. A Statement of Overriding Considerations would be prepared and adopted to provide reasoning for the acceptance of significant and unavoidable impacts.

EXHIBIT "A"
FINDINGS OF FACT

A. AGRICULTURAL RESOURCES

1. Farmland Conversion

Threshold: Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

Findings: Significant and unavoidable impact. (Draft EIR, pp. 3.2-9 through 3.2-10.) Changes or alterations have been required in, or incorporated into, the Project that avoid or substantially lessen some of the significant environmental effects as identified in the EIR. (State CEQA Guidelines, § 15091(a)(1).) It is not feasible, however, to fully mitigate the Project impact to a level of less than significant. Impacts would remain significant and unavoidable. Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the EIR. (State CEQA Guidelines, § 15091(a)(3).)

Explanation: Development of the Project would convert 256.72 acres of Prime Farmland, 0.09 acres of Unique Farmland, and 0.51 acres of Grazing Land to non-agricultural uses. Implementation of the Project would convert approximately 59 percent of the Prime Farmland, and approximately 45 percent of all Important Farmland, remaining in the NEQSP area to urban uses.

Although the Project is consistent with the Dixon General Plan's land use designation which anticipates the property developing to urban uses, development of the Project would result in the conversion of 257.32 acres of Important Farmland to non-agricultural uses, directly converting Important Farmland to urban uses. The Northeast Quadrant Specific Plan EIR identified that conversion of Prime Farmland within the NEQSP area would be a significant and unavoidable impact.

The Project site is currently in active agricultural production while awaiting development for urban uses, consistent with General Plan Policy NE-1.5. As shown in Table 3.2-1, the Project site is almost exclusively identified as Prime Farmland due to the underlying soil type.

As discussed in the City General Plan, there is no land within the city limits with an agricultural land use designation. The Project site is currently zoned for 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) as part of the Project. All of these zones anticipate development and the conversion of lands in current agricultural production to non-agricultural uses. Although the Project site was already designated for development in the General Plan and NEQSP, the Project would nevertheless remove 257.32 acres of Important Farmland from production, which the City conservatively determined to be a potentially significant impact. (Draft EIR, pp. 3.2-9 through 3.2-10.)

Mitigation Measure 3.2-1: *The Project proponent shall provide conservation of agricultural land within the Dixon Planning Area or within a ten-mile radius of the City at a 1:1 ratio, or pay the appropriate fee to participate in the City's master agricultural conversion program.*

B. AIR QUALITY

1. Conflict or Obstruct Air Quality Plan

Threshold: Would the Project operations cause a violation of an air quality standard or contribute substantially to an existing or projected air quality violation?

Findings: Significant and Unavoidable. (Draft EIR, pp. 3.3-22 through 3.3-24.) Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects as identified in the EIR. (State CEQA Guidelines, § 15091(a)(1).)

Explanation: The Project would be a direct and indirect source of air pollution, in that it would generate and attract vehicle trips in the region (mobile source emissions), require the use of grid energy (natural gas and electricity), and generate area source emissions. The mobile source emissions would be entirely from vehicles, while the area source emissions would be primarily from landscape fuel combustion, consumer products, and architectural coatings.

CalEEMod was used to estimate operational emissions for the Project, without any mitigation measures incorporated. Table 3.3-8 shows the operational emissions, which includes both mobile and area source emissions of criteria pollutants that would result from the Project. Detailed CalEEMod emissions calculations are presented in Appendix B. The YSAQMD has established an operational emissions threshold of significance for ozone precursors of 10 tons per year for ROG and NOX, and 80 pounds per day for PM10. The YSAQMD utilizes a screening process and separate model for CO impacts. As shown in the table above, Project generated emissions would be above the YSAQMD 10 tons per year threshold for ROG and the 80 pounds per day threshold for PM10. Therefore, the Project could result in a potentially significant impact.

However, the Project would include the following Project sustainability components (written as provided by CalEEMod) that would reduce Project operational emissions compared to the unmitigated scenario as provided in Table 3.3-8.

- Install low-flow appliances (bathroom faucet, kitchen faucet, toilet, and shower) for all residences, consistent with the latest version of California's Title 24 Energy Efficiency Standards; and
- Install on-site renewable energy systems for single-family residential properties, consistent with the latest version of California's Title 24 Energy Efficiency Standards.

Because Project operations would exceed YSAQMD's thresholds, the impact is potentially significant. As described under Mitigation Measure 3.3-1(a), the Project is required to exceed Title 24 Building Envelope Energy Efficiency Standards by 1%. Furthermore, the Project would also be required to implement Mitigation Measure 3.3-1(b), which would require the operators of heavy-duty trucks that travel to and from the Project site during Project operation to use trucks that have 2010 model year or newer engines that meet the CARB's 2010 engine emission standards of 0.01 g/bhp-hr for particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions, or newer, cleaner trucks and equipment. However, due to the difficulty in modeling the emissions (i.e., NOx emissions) reductions that would occur due to implementation of Mitigation Measure 3.3-1(b), the emissions reductions associated with Mitigation Measure 3.3-1(b) were not modeled. Thus, Table 3.3-9 provides a conservative estimate of the operational emissions results for the Project, with the quantified Project sustainability components and mitigation measures accounted for, where possible.

As shown in Table 3.3-9, below, incorporation of these quantified Project sustainability components and mitigation measures (listed above) would only negligibly reduce Project emissions, as calculated using CalEEMod (v.2020.1.1.21). This is primarily due to the fact that the Project's criteria pollutant emissions primarily derive from mobile emissions. However, it is anticipated that mobile emissions would be reduced further than as shown in Table 3.3-9, based on implementation of Mitigation Measure 3.3-1(b). Even with implementation of feasible mitigation (i.e., Mitigation Measure 3.3-1(a) and 3.3-1(b)), the Project operational emissions would exceed the YSAQMD threshold of significance for ROG. This is primarily due to the number of mobile vehicle trips generated by the Project. Therefore, the Project

would be required to implement Mitigation Measure 3.3-1(a) and through (d). No further operation-related mitigation is feasible.

Implementation of Mitigation Measure 3.3-1(a) through (d) would reduce Project operation-related criteria pollutant emissions. However, even after these mitigation measures are applied, Project PM10 emissions would be above the applicable YSAQMD thresholds. Therefore, there is a significant and unavoidable impact relative to this topic. (Draft EIR, pp. 3.3-22 through 3.3-24.)

Mitigation Measure 3.3-1(a): *Prior to the issuance of each building permit, the Project applicant shall ensure that the Project buildings are designed to exceed the Title 24 Building Envelope Energy Efficiency Standards by 1% or greater.*

Mitigation Measure 3.3-1(b): *During Project construction, operators of heavy-duty trucks that travel to and from the Project site are required to use trucks that have 2010 model year or newer engines that meet the CARB's 2010 engine emission standards of 0.01 g/bhp-hr for particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions, or newer, cleaner trucks and equipment.*

Mitigation Measure 3.3-1(c): *The Project applicant shall require the use of super compliant, low-VOC paints (less than 10 g/L) during the architectural coating construction phase of Project construction, and during Project maintenance.*

Mitigation Measure 3.3-1(d)*: During Project construction, the Project applicant shall install Level 2 EV charging stations in 15% of all parking spaces for multi-family developments and pre-wiring to allow for a Level 2 EV charging stations in all single-family residential garages.*

2. Violation of Air Quality Standard

Threshold: Would the Project construction cause a violation of an air quality standard or contribute substantially to an existing or projected air quality violation?

Findings: Significant and Unavoidable. (Draft EIR, pp. 3.3-22 through 3.3-24.) Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects as identified in the EIR. (State CEQA Guidelines, § 15091(a)(1).)

Explanation: Construction activities associated with construction and implementation of the Project would result in temporary short-term emissions associated with vehicle trips from construction workers, operation of construction equipment, and the dust generated during construction activities. These temporary and short-term emissions would generate additional ozone precursors (ROG and NOx) as well as PM10, which could exacerbate the County's existing non-attainment status for these criteria pollutants. It should be noted that construction vehicle emissions requirements in California have become stricter over time. Below is an estimated construction schedule for the Project, as provided by the Project applicant:

- Demolition (February 1, 2025 – March 1, 2025)
- Grading (Phase 1) (February 1, 2025 – April 1, 2025)
- Grading (Phase 2) (February 1, 2026 – March 1, 2026)
- Grading (Phase 3) (February 1, 2027 – March 1, 2027)
- Building Construction (Phase 1) (February 1, 2025 – December 1, 2025)
- Building Construction (Phase 2) (February 1, 2026 – August 1, 2026)
- Building Construction (Phase 3) (February 1, 2027 – August 1, 2027)
- Paving (October 1, 2025 – February 1, 2026)
- Architectural Coatings (Phase 1) (February 1, 2025 – December 1, 2025)

- Architectural Coatings (Phase 2) (February 1, 2026 – August 1, 2026)
- Architectural Coatings (Phase 3) (February 1, 2027 – August 1, 2027)

CalEEMod was used to estimate construction emissions for the Project. Table 3.3-10 shows the construction emissions that would result from the Project. Detailed CalEEMod emissions calculations are presented in Appendix B. The YSAQMD has established a construction emissions threshold of significance for ozone precursors of 10 tons per year for ROG and NOX, and 80 pounds per day for PM10. The YSAQMD utilizes a screening process and separate model for CO impacts. As shown in the table above, construction emissions of ROG would be at its maximum in year 2025, with approximately 4.85 tons of ROG, which is below the 10 tons per year threshold for ROG. Year 2025 would also be the peak year for construction emissions of NOx, with approximately 3.63 tons of NOx in that year, which is below the 10 tons per year threshold for NOx. PM10 construction emissions remain above the 80 pounds per day threshold for PM10, with a maximum of approximately 160 pounds per day in 2025. This is a potentially significant impact.

YSAQMD advises that projects exceeding project construction emissions thresholds should implement best management practices to reduce dust emissions and avoid localized health impacts that could be generated by dust. Approximately 99 percent of the PM10 emissions during the construction emissions years would be related to PM10 dust, with the remainder related to PM10 exhaust. The YSAQMD recommends the use of construction dust mitigation measures to reduce PM10 emissions during construction. The YSAQMD's Handbook for Assessing and Mitigating Air Quality Impacts (2007) provides a list of dust mitigation measures along with their effectiveness at reducing PM10 emissions. Table 3.3-11 identifies a list of construction dust mitigation reduction assumptions used for this analysis.

CalEEMod allows the selection of mitigation measures that would reduce Project-related construction PM10 emissions. The following parameters were used within CalEEMod to calculate reductions in PM10, consistent with Mitigation Measure 3.3-2:

- Use Dust Suppressants (42% Fugitive Dust PM10 reduction);
- Water Exposed Area two times daily (50% Fugitive Dust PM10 reduction);
- Sweep Paved Roads (14% Fugitive Dust PM reduction).
- Additional measures were applied in CalEEMod:
- Unpaved Road Mitigation: Limit on-site construction vehicle speeds to 5 mph.

Implementation of the CalEEMod dust mitigation listed above, which is consistent with the Mitigation Reduction Assumptions listed in Table 3.3-11 above, would reduce Project-related construction PM10 emissions slightly. However, since Project-related construction PM10 emissions are overwhelmingly generated by on-road construction vehicles, implementation of Mitigation Measure 3.3-2 would have a minimal quantitative impact. No further construction-related mitigation is feasible.

The overall results of Project construction emissions with mitigation incorporated is provided in Table 3.3-12. As shown above, even with implementation of Mitigation Measure 3.3-2, which is consistent with the CalEEMod mitigation listed above, the Project would exceed the YSAQMD's threshold for construction PM10 emissions. Therefore, overall, the Project would have a significant and unavoidable impact as it relates to construction emissions. (Draft EIR, pp. 3.3-22 through 3.3-24.)

Mitigation Measure 3.3-2: *The Project applicant shall implement the following dust control measures during all construction activities. These measures shall be incorporated as part of the building and grading plans.*

- *Water all active construction sites at least two times daily. Frequency should be based on the type of operation, soil, and wind exposure.*

- *Apply water or dust palliatives on exposed earth surfaces as necessary to control dust emissions. Construction contracts shall include dust control treatment in late morning and at the end of the day, of all earth surfaces during clearing, grading, earth moving, and other site preparation activities. Non-potable water shall be used, where feasible. Existing wells shall be used for all construction purposes where feasible. Excessive watering will be avoided to minimize tracking of mud from the Project onto streets as determined by Public Works.*
- *Grading operations on the site shall be suspended during periods of high winds (i.e. winds greater than 15 miles per hour).*
- *Outdoor storage of fine particulate matter on construction sites shall be prohibited.*
- *Contractors shall cover any stockpiles of soil, sand and similar materials. There shall be no storage of uncovered construction debris for more than one week.*
- *Re-vegetation or stabilization of exposed earth surfaces shall be required in all inactive areas in the Project.*
- *Cover all trucks hauling dirt, sand, or loose materials, or maintain at least two feet of freeboard within haul trucks.*
- *Apply non-toxic binders (e.g., latex acrylic copolymer) to exposed areas after cut and fill operations and hydroseed area (as applicable).*
- *Sweep streets if visible soil material is carried out from the construction site.*
- *Treat accesses to a distance of 100 feet from the paved road with a 6-inch layer of gravel.*
- *Reduce speed on unpaved roads to less than 5 miles per hour.*

3. Toxic Air Contaminants

Threshold: Would the Project would expose the public to toxic air contaminants?

Findings: Significant and Unavoidable. (Draft EIR, pp. 3.3-29 through 3.3-32.) Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects as identified in the EIR. (State CEQA Guidelines, § 15091(a)(1).)

Explanation: The screening approach outlined in the YSAQMD's Handbook for Assessing and Mitigating Air Quality Impacts (2007) was used to estimate whether or not the Project would result in air quality impacts associated with land use conflicts and sensitive receptors. The screening approach uses the Project location relative to other uses to determine if there is the potential for localized air quality impacts. Localized air pollution impacts generally occur in one of two ways:

1. a (new) source of air pollutants is proposed to be located close to existing receptors. For example, an industrial facility is proposed for a site near a school; or
2. a (new) development project with receptors is proposed near an existing source of air pollutants. For example, a hospital is proposed for a site near an industrial facility.

The amount of emissions, the proximity between the emissions source and the nearest receptor, the direction of prevailing winds, and local topography can all influence the severity of a localized impact. The most frequent impacts are those related to: Toxic Air Contaminants (TACs), Odors, and Construction Dust.

TACs

A toxic air contaminant (TAC) is defined as an air pollutant that may cause or contribute to an increase in mortality or in serious illness, or that may pose a hazard to human health. TACs are usually present in minute quantities in the ambient air. However, their high toxicity or health risk may pose a threat to public health even at very low concentrations. In general, for those TACs that may cause cancer, there is no concentration that does not present some risk. This contrasts with the criteria pollutants for which

acceptable levels of exposure can be determined and for which the state and federal governments have set ambient air quality standards.

The California Air Resources Board (CARB) published the Air Quality and Land Use Handbook: A Community Health Perspective (2007) to provide information to local planners and decision-makers about land use compatibility issues associated with emissions from industrial, commercial and mobile sources of air pollution. The ARB Handbook indicates that mobile sources continue to be the largest overall contributors to the State's air pollution problems, representing the greatest air pollution health risk to most Californians. The most serious pollutants on a statewide basis include diesel exhaust particulate matter (diesel PM), benzene, and 1,3-butadiene, all of which are emitted by motor vehicles. These mobile source air toxics are largely associated with freeways and high traffic roads. Non-mobile source air toxics are largely associated with industrial and commercial uses. Table 3.3-13 provides the California Air Resources Board minimum separation recommendations on siting sensitive land uses.

The Project does not include any of the source categories listed in Table 3.3-13. The Project does not include the long-term operation of any other major onsite stationary sources of TACs. In addition, no major stationary sources of TACs have been identified in the immediate vicinity of the Project site. Sensitive receptors within the Project site are not located adjacent to a freeway or high traffic road that is considered a significant source of mobile source air toxics. Specifically, although I-80 is located adjacent to the Project site along the northwest corner of the Project site, all sensitive receptors (i.e. residential land uses) are located greater than 500 feet from I-80 (the residential land uses are located approximately 650 feet away from I-80, at their closest location). Furthermore, in the case that any light industrial uses that could generate TACs are proposed to be developed within the Dixon Opportunity Center, at the time when such uses are known, the YSAQMD would require additional analysis of such TACs using air dispersion modeling software (such as AERMOD) and applicable air toxics health risk analysis. Ultimately, the Project would comply with the YSAQMD requirements associated with TAC modeling, as required, at the time specific Project details are known.

Implementation of the Project would not be anticipated to result in an increased exposure of sensitive receptors to localized concentrations of TACs that would exceed the relevant standards or thresholds. Therefore, this Project would have a less than significant impact on sensitive receptors.

Dust/Particulate Matter

The Project requires earthmoving during the Project's construction phase. The majority of earthmoving would be associated with clear and grub, rough grading, trench/backfill, final grading, and building construction activities.

These construction activities would result in temporary dust generation (PM10). Without control, dust emissions can create nuisances or localized health impacts. CalEEMod was used to estimate construction PM10 emissions for the Project. Construction emissions are discussed in more detail under Impact 3.3-2, Construction Impacts. Detailed CalEEMod emissions calculations are presented in Appendix B.

Implement Mitigation Measure 3.3-2 to address the potentially significant impact. However, because construction activities would result in a dust and particulate matter level that exceeds the YSAQMD's threshold, the impact would be potentially significant.

Implementation of the dust mitigation required under Mitigation Measure 3.3-4, and as reprinted in the above bullet list, would not be sufficient to reduce proposed Project particulate matter emissions during Project construction to be reduced to below the applicable YSAQMD criteria pollutant threshold.

Therefore, the Project would have a significant and unavoidable impact with regard to dust and/or particulate matter. (Draft EIR, pp. 3.3-29 through 3.3-32.)

C. TRANSPORTATION

1. Vehicle Miles Traveled ("VMT") Impacts

Threshold: Would implementation of the Project be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) regarding Vehicle Miles Traveled (VMT)?

Findings: Significant and unavoidable impact. (Draft EIR, pp. 3.15-21 through 3.15-23.) Changes or alterations have been required in, or incorporated into, the Project that avoid or substantially lessen some of the significant environmental effects as identified in the EIR. (State CEQA Guidelines, § 15091(a)(1).) It is not feasible, however, to fully mitigate the Project impact to a level of less than significant. Impacts would remain significant and unavoidable. Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the EIR. (State CEQA Guidelines, § 15091(a)(3).)

Explanation: A travel demand model run was conducted using assumptions summarized in the previous sections to identify project VMT per capita and per job. Outputs were summarized and evaluated against the adopted thresholds of significance, or 85% of the baseline VMT per capita and VMT per job for the City of Dixon, or 18.6 VMT per capita and 14.2 VMT per job.

As shown previously in Table 3.15-5, the home-based VMT per capita for the project is 22.1 VMT per Capita and 16.3 VMT per job, which exceeds the threshold of significance by 18.5% and the home-based work VMT per employee exceeds the threshold of significance by 14.7%. This exceedance of thresholds would result in a potentially significant impact.

The VMT mitigation target and associated calculations are described in detail in the VMT Assessment Memo, dated February 2, 2024. The mitigation strategies were reviewed for their feasibility in being incorporated into the project. However, strategies that could potentially provide the level of mitigation needed to support a finding of less than significant with mitigation would either change the fundamental nature of the project, be infeasible from a market perspective, or not provide the needed level of mitigation.

The VMT Assessment Memo discusses measures including increasing project density and integrating affordable housing, with a potential mitigation effectiveness of up to 30%. However, incorporating increased density or affordable housing is deemed infeasible due to potential changes to the project's fundamental nature. Similarly, parking policies, such as limiting residential parking supply and unbundling parking costs, could mitigate VMT by up to 15.7%. Nonetheless, reducing the parking supply by half would result in only a 7% reduction in residential VMT, and unbundling parking costs for multifamily units, which account for 22% of residential VMT, would have a maximum reduction effectiveness of about 3%, falling short of mitigation goals.

The memo also details strategies to mitigate employment-related VMT. The current employment density of 42 jobs per acre is generally insufficient to demonstrate VMT reductions, and increasing density to the required levels would significantly alter the project's nature. Mandatory commute trip reduction programs, including components such as marketing, ridesharing, subsidized transit, bicycle facilities, and vanpools, could achieve a mitigation effectiveness of up to 26% if more than half (57%) of employees participate. An employer-sponsored vanpool alone could reduce employment-related VMT by 20%, requiring about 16% of employees to use it. However, parking pricing strategies, such as workplace parking

pricing and employee parking cash-out, have documented effectiveness but may not be feasible due to the ample unpriced parking in the area, though they could be integrated into a broader commute trip reduction program.

The employment-related VMT of the project could potentially be mitigated through the implementation of a mandatory commute trip reduction program. However, for the home-based VMT associated with the project's residential uses, no feasible mitigation strategy has been identified that would sufficiently reduce impacts to below significant levels. Consequently, the overall VMT impact of the project would remain significant and unavoidable. (Draft EIR, pp. 3.15-21 through 3.15-23)

> ***Mitigation Measure 3.15-2:*** *The effectiveness of various VMT mitigation strategies as documented in the literature is summarized in the California Air Pollution Control Officers Association (CAPCOA) Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Change Vulnerabilities, and Advancing Health Equity (CAPCOA Handbook). Table 3.15-6 summarizes the maximum potential effectiveness of various applicable strategies documented in the CAPCOA Handbook that were considered for potential incorporation into the Project.*
>
> *Although implementation of any feasible VMT-reducing measures would not provide the level of mitigation necessary to significantly reduce VMT-related Project impacts, the following measures shall be implemented to lessen impacts to the extent possible:*
>
> *All future employers at the Project site shall:*
>
> • *Implement a voluntary employee trip reduction program;*
>
> • *Identify a carpool coordinator;*
>
> • *Include preferential carpool parking spot(s) at employee-generating development*
>
> *to be reserved for use by employees who carpool (2+ employees per car per ride);*
>
> • *Provide incentives as feasible for employees who walk, ride manual bicycles, and/or take public transportation to work more than half of the time and can provide proof;*
>
> • *Ensure the availability of a secure bicycle storage area within the Dixon Opportunity Center for use by employees; and*
>
> • *Allow remote work for applicable employees where feasible for one or more days per week or equivalent hours.*

SECTION 5. FINDINGS REGARDING CUMULATIVE ENVIRONMENTAL IMPACTS

Consistent with CEQA's requirements, the EIR for the Project includes an analysis of cumulative impacts. The City hereby finds as follows:

A. AESTHETICS

Threshold: Would the project, combined with other related cumulative projects, have a substantial adverse effect on a scenic vista?

Finding: Less-than-significant impact. (Draft EIR, Section 3.1, pages 3.1-17 through 3.1-18.)

Explanation: Under cumulative conditions, the City of Dixon will continue to build out, adding to the urban landscape and decreasing the number and quality of scenic vistas. As new buildings are constructed, they may obstruct existing scenic views of the Sierra Nevada, Coastal Mountain Range, or sweeping agricultural areas in unincorporated Solano County. Cumulative development is not anticipated to adversely affect designated or eligible State Scenic Highways as the only Eligible State Scenic Highway is the segment of SR 128 from approximately the town of Winters to Rutherford to the west of the County. Nevertheless, cumulative development facilitated by the General Plan could adversely affect the scenic vistas and views available throughout the City, resulting in a potentially cumulative significant impact. The Project would contribute to the urbanization of the City and result in the construction of new structures that could impede views. The Project is an anticipated development area in the Dixon General Plan as part of the Northeast Quadrant Specific Plan. The Project includes policies and implementing actions aimed at maintaining view corridors across the Project site. The Project would be subject to Zoning Ordinance requirements associated with site planning and development regulations including the height limitations, screening and landscaping, setbacks, and design review requirements established in Section 18.23. Compliance with the requirements within the General Plan and Zoning Code would reduce visual impacts to the greatest extent feasible; and the change of agricultural land to a landscaped subdivision is not necessarily a degrading of visual character. Therefore, the Project would have a less-than-considerable contribution to this impact, and the cumulative impact to scenic vistas would be less than significant.

Threshold: Would the Project, in combination with other cumulative development, could substantially degrade the existing visual character or quality of public views of the site and its surroundings or conflict with applicable zoning and other regulations governing scenic quality?

Finding: Less-than-significant impact. (Draft EIR, Section 3.1, pages 3.1-18 through 3.1-19.)

Explanation: Under cumulative conditions, buildout of the General Plan for Dixon and the surrounding jurisdictions could result in changes to the visual character and quality of the City of Dixon through development of undeveloped areas and/or changes to the character of existing communities. In order to reduce the visual impacts of urban development, development within the City is required to be consistent with the General Plan and the Dixon Zoning Ordinance, which include design standards. These standards include specifications for building height, massing, and orientation, exterior lighting standards, and landscaping standards. Following the City's design requirements will produce urban developments that will be internally cohesive, while maintaining an aesthetic feel similar to that of the surrounding uses. The loss of the visual appearance of agricultural land within the City limits will change the visual character of the area in. Compliance with the requirements within the General Plan and Zoning Code would reduce visual impacts to the greatest extent feasible; and the change of agricultural land to a urbanized areas is not necessarily a degrading of visual character. Cumulative development anticipated under the General Plan would have a Less-than-significant impact cumulative impact on aesthetics and visual character.

Threshold: Would the project, combined with other related cumulative projects, create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Finding: Less-than-significant impact. (Draft EIR, Section 3.1, page 3.1-19.)

Explanation: Future development and cumulative development are located within the Planning Area and are therefore within an "Urbanized Area." Implementation of the General Plan Update would result in new development and intensification of existing urban uses along major corridors. While the Project does not include any specific development proposals, the Project could facilitate future development projects within these areas at higher densities and intensities than currently exist. Development within the

City is subject to the Lawndale Zoning Code, which provides for project-specific design review of future development proposals, which would ensure that development is consistent with the General Plan Update goals, policies, and actions, and the Zoning Code. Individual development projects are reviewed subject to the specific zoning district and development being proposed. Further, future projects implemented under the General Plan Update would be required to be consistent with the General Plan Update policies and actions and adopted regulations pertaining to scenic quality. The Project would not conflict with applicable zoning and other regulations governing scenic quality. Thus, the Project's incremental effects involving potential conflicts with applicable zoning and other regulations governing scenic quality would not be cumulatively considerable.

B. AGRICULTURAL RESOURCES

Threshold: Would the Implementation of the Project, in combination with other cumulative development, would convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use?

Finding: Significant and unavoidable impact. (Draft EIR, Section 3.2, pages 3.2-9 through 3.2-10.). Changes or alterations have been required in, or incorporated into, the Project that avoid or substantially lessen some of the significant environmental effects as identified in the EIR. (State CEQA Guidelines, § 15091(a)(1).) It is not feasible, however, to fully mitigate the Project impact to a level of less than significant. Impacts would remain significant and unavoidable. Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the EIR. (State CEQA Guidelines, § 15091(a)(3).)

Explanation: A significant cumulative impact could occur if the Project, in conjunction with other reasonably foreseeable projects in the area, results in indirect impacts that exert pressure on agricultural lands to convert to non-agricultural use. Such indirect impacts can include the division of large tracts of continuous agricultural land into smaller, less agriculturally viable tracts; the presence of incompatible uses adjacent to existing agricultural operations that could lead to the restriction of chemical use and/or complaints regarding noise, dust, and odors; increases in land values and taxes that exert pressure on agricultural landowners to convert to urban uses; and loss of agricultural support infrastructure, such as processing facilities. In addition, urban growth may increasingly compete with agriculture for the use of water resources, and may conflict with operational use of area roadways. Dixon is surrounded on all sides by agricultural land. While there are some pockets of land within the City limits that are still being farmed, there are no agriculturally designated lands in the City; the City intends to grow within its existing City limits and limit development outside of the City limits. However, suburban sprawl, particularly in areas where there are adequate resources and open land, continues in Solano County and throughout the state. The conversion of agricultural land to urban uses is a potentially significant cumulative impact. The Project is within the NEQSP and within the City limits. It is planned for urban development in the City's General Plan and NEQSP, although it is currently being farmed. The Project would result in the conversion of 257.32 acres of Important Farmland to non-agricultural uses. Further, development of the proposed Project may encourage other areas within the NEQSP area to develop, further removing Important Farmland from production The proposed Project would have a considerable contribution to a cumulative loss of agricultural land, and the impact would be potentially significant. Implement Mitigation Measure 3.2-1 to address the potentially significant impact. However, the conversion of agricultural land to urban use is not directly mitigable, aside from preventing development altogether, as agricultural land is a finite and irreplaceable resource. The City's General Plan and the NEQSP reflect a policy determination to allow a certain amount of growth to occur in the city, which necessitates conversion of farmland to urban uses. Beyond disallowing

the project, there are no feasible mitigation measures for agricultural land conversion that would also fulfill the objectives of and implement the Project. The impact would remain significant and unavoidable.

C. AIR QUALITY

Threshold: Implementation of the Project, in combination with other cumulative development, would cause a violation of any air quality standard or contribute substantially to an existing or projected air quality violation?

Finding: Significant and Unavoidable. (Draft EIR, Section 3.3, pages 3.3-34 through 3.3-35.)

Explanation: Under buildout conditions in Solano County, the SVAB would continue to experience increases in criteria pollutants and efforts to improve air quality throughout the basin would be hindered. Solano County has a State designation Attainment or Unclassified for all criteria pollutants except for ozone and PM10. Solano County has a national designation of either Unclassified or Attainment for all criteria pollutants except for ozone. Table 3.3-2 presents the state and national attainment status for Solano County. As discussed under Impact 3.3-1 and Impact 3.3-2, the YSAQMD has established its thresholds of significance by which the Project emissions are compared against to determine the level of significance. For operational emissions, the YSAQMD has established an operational emissions threshold of significance for ozone precursors of 10 tons per year for ROG and NOX, and 80 pounds per day for PM10. The YSAQMD utilizes a screening process and separate model for CO impacts. Project-generated operational emissions would be above the YSAQMD 10 tons per year threshold for ROG and the 80 pounds per day threshold for PM10, even under the mitigated scenario. Moreover, the YSAQMD has established a construction emissions threshold of significance for ozone precursors of 10 tons per year for ROG and NOX, and 80 pounds per day for PM10. The YSAQMD utilizes a screening process and separate model for CO impacts. As shown in Table 3.3-12, construction emissions of ROG would be at its maximum in year 2025, with approximately 4.85 tons of ROG, which is below the 10 tons per year threshold for ROG. Year 2025 would also be the peak year for construction emissions of NOx, with approximately 3.63 tons of NOx in that year, which is below the 10 tons per year threshold for NOx. PM10 construction emissions remain above the 80 pounds per day threshold for PM10, with a maximum of approximately 160 pounds per day in 2025. Because Project construction and operational-related emission would exceed YSAQMD's thresholds, this cumulative impact is considered significant and unavoidable and cumulatively considerable.

Threshold: Implementation of the Project, in combination with other cumulative development, would not cause carbon monoxide impacts?

Finding: Less-than-significant impact. (Draft EIR, Section 3.3, pages 3.3-35 through 3.3-36.)

Explanation: Under buildout conditions in Solano County, carbon monoxide levels are anticipated to increase as new development occurs, largely generated by new traffic. Project traffic would increase concentrations of carbon monoxide along streets providing access to the Project. Carbon monoxide (CO) is a local pollutant (i.e., high concentrations are normally only found very near sources). A cumulative traffic analysis was prepared for the Project by Flecker Associates. However, cumulative scenario traffic volumes for the intersections and streets, as identified by the traffic analysis (see Section 3.15 of this EIR), does not rise to a level sufficient to feasibly cause a CO Hotspot impact. The potential for the creation of a CO hotspot would require a roadway segment or intersection with peak hour traffic volumes in the tens of thousands. However, as described under Impact 3.3-3, there are no cumulative scenario traffic intersections

or roadways that would be affected by the Project that would reach this level of traffic volume; therefore, there is no potential for the creation of a CO hotspot that would result in violations of applicable ambient air quality standards, and further modeling is not warranted. Since the Project is within an attainment area for carbon monoxide (ambient air quality standards are currently attained) and in an area with low background concentrations, and since it is not expected that a CO hotspot would be generated by the Project under the cumulative scenario, changes in carbon monoxide levels resulting from the Project would not result in violations of the ambient air quality standards, and would represent a less than significant impact.

Threshold: Implementation of the Project, in combination with other cumulative development, would expose the public to toxic air contaminants?

Finding: Significant and Unavoidable. (Draft EIR, Section 3.3, pages 3.3-36 through 3.3-37.)

Explanation: The screening approach outlined in the YSAQMD's Handbook for Assessing and Mitigating Air Quality Impacts (2007) was used to estimate whether or not the Project would result in air quality impacts associated with land use conflicts and sensitive receptors. The screening approach uses the Project location relative to other uses to determine if there is the potential for localized air quality impacts. Localized air pollution impacts generally occur in one of two ways: (1) a (new) source of air pollutants is proposed to be located close to existing receptors. For example, an industrial facility is proposed for a site near a school; or (2) a (new) development project with receptors is proposed near an existing source of air pollutants. For example, a hospital is proposed for a site near an industrial facility. The amount of emissions, the proximity between the emissions source and the nearest receptor, the direction of prevailing winds, and local topography can all influence the severity of a localized impact. The most frequent impacts are those related to: Toxic Air Contaminants (TACs), Odors, and Construction Dust. The Project does not include any of the source categories listed in Table 3.3-13. The Project does not include the long-term operation of any other major onsite stationary sources of TACs. In addition, no major stationary sources of TACs have been identified in the immediate vicinity of the Project site. Sensitive receptors within the Project site are not located adjacent to a freeway or high traffic road that is considered a significant source of mobile source air toxics. Specifically, although I-80 is located adjacent to the Project site along the northwest corner of the Project site, all sensitive receptors (i.e. residential land uses) are located greater than 500 feet from I-80 (the residential land uses are located approximately 650 feet away from I-80, at their closest location). Furthermore, in the case that any light industrial uses that could generate TACs are proposed to be developed within the Dixon Opportunity Center, at the time when such uses are known, the YSAQMD would require additional analysis of such TACs using air dispersion modeling software (such as AERMOD) and applicable air toxics health risk analysis. Ultimately, the Project would comply with the YSAQMD requirements associated with TAC modeling, as required, at the time specific Project details are known. However, Project construction activities would result in temporary dust generation (PM10). Without control, dust emissions can create nuisances or localized health impacts. CalEEMod was used to estimate construction PM10 emissions for the Project. Construction emissions are discussed in more detail under Impact 3.3-2, Construction Impacts. Detailed CalEEMod emissions calculations are presented in Appendix B. However, implementation of the dust mitigation required under Mitigation Measure 3.3-2 would not be sufficient to reduce Project particulate matter emissions during Project construction to be reduced below the applicable YSAQMD criteria pollutant threshold. Therefore, the Project would have a significant and unavoidable impact with regard to dust and/or particulate matter under cumulative conditions.

Threshold: Implementation of the Project, in combination with other cumulative development, would not expose sensitive receptors to odors?

Finding: Less-than-significant impact. (Draft EIR, Section 3.3, pages 3.3-37 through 3.3-38.)

Explanation: While offensive odors rarely cause any physical harm, they can be very unpleasant, leading to considerable distress among the public and often generating citizen complaints to local governments and the YSAQMD. The general nuisance rule (Health and Safety Code §41700 and YSAQMD District Rule 2.5) is the basis for the YSAQMD threshold. A project may reasonably be expected to have a significant adverse odor impact where it "generates odorous emissions in such quantities as to cause detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which may endanger the comfort, repose, health, or safety of any such person or the public, or which may cause, or have a natural tendency to cause, injury or damage to business or property." As discussed under Impact 3.3-4, implementation of the Project would not place sensitive receptors adjacent to known toxic air contaminants above the applicable standards and thresholds. Similarly, implementation of the Project would not directly create or generate objectionable odors to a significant degree. The Project would also not place sensitive receptors near objectionable odors. Trash in enclosed areas would be separated at a sufficient distance from nearby residences, and enclosed in industry-standard containers, such that odors from trash would not generally generate noticeable odors for nearby residential receptors. The closest source of odors includes active agricultural operations located east, west, north, and south of the Project site. However, these sources of odors are transient and are not anticipated to cause substantial offensive odors on the residents or users of the Project. Separately, there are no other known sources of odors within the screening distance of one mile that is recommended by the YSAQMD. Therefore, there are no other known producers of odors within vicinity of the Project site. The Project does not propose uses that would create new odors that would adversely affect a substantial number of people. Therefore, operation of the Project would not result in significant objectionable odors, even when considering the Project in a cumulative context. Therefore, impacts associated with exposure to odors would be less than significant.

D. BIOLOGICAL RESOURCES

Threshold: The Project, in combination with other cumulative development, could result in the loss of biological resources including habitats and special status species?

Finding: Less than significant with mitigation incorporated. (Draft EIR, page 3.4-47.). Changes or alterations have been required in, or incorporated into, the Project that avoid or substantially lessen the significant environmental effects as identified in the EIR. (State CEQA Guidelines, § 15091(a)(1).)

Explanation: Under cumulative conditions, buildout of the General Plan(s) within Solano County will result in impacts to biological resources in the cumulative area through new and existing development and habitat loss. Further, some developments may result in the take of species or a disruption to wildlife corridors. Therefore, the cumulative impact to biological resources is potentially significant. The Project has the potential to result in impacts to special-status species in the region. Although there has been no documented sighting within the immediate area in, or near the Project site, the Project site provides potential habitat for several species. Therefore, the Project would have a considerable contribution to the impact, and the impact would be potentially significant. Mitigation Measure 3.4-12 requires measures to avoid or minimize impacts on other protected bird species that may occur on the site. In addition, Mitigation Measure 3.4-12 requires that, prior to grading, the Project applicant is required to conduct a survey of the area to be graded for bat roosts, and if present, the Project applicant shall implement the following measures to avoid or minimize impacts on special-status bats. Implementation of Mitigation Measure 3.4-12 would reduce potentially cumulative impacts to a less than significant level.

E. CULTURAL RESOURCES

Threshold: Implementation of the Project, in combination with other cumulative development, could contribute to the cumulative loss or alteration of historic-era and indigenous archaeological resources and/or human remains in archaeological contexts?

Finding: Less than significant with mitigation incorporated. (Draft EIR, Section 3.1, pages 3.5-22 through 3.5-23). Changes or alterations have been required in, or incorporated into, the Project that avoid or substantially lessen the significant environmental effects as identified in the EIR. (State CEQA Guidelines, § 15091(a)(1).)

Explanation: Cumulative development in Solano County, in portions of the Sacramento Valley identified as the territory of the Yocha Dehe Winton Nation Native American community, or the area of historic-era use and occupation in Solano County could result in significant cumulative impacts on cultural and tribal cultural resources. Each individual project is subject to review under CEQA and is required to obtain necessary permits and approvals from federal and state resource agencies. As a result of these processes, each project would be required to avoid, minimize, and compensate for its impacts on sensitive cultural resources, such that the cumulative impact would be reduced, though not completely eliminated. Because not all such impacts from these other projects have been or can be reduced with certainty to Less-than-significant impact levels, the loss of any cultural or tribal cultural resources would result in a potentially significant cumulative impact.

The Cultural Resources Assessment concluded that the Project site possesses a moderate to high potential to contain previously unrecorded prehistoric and/or historic era cultural resources. There is no indication that the Project site contains human remains; however, the possibility cannot be entirely discounted. The discovery of previously unknown archaeological resources or human remains, including those that could qualify as tribal cultural resources, is possible given the history of the area. As a result, development allowed under the Project could result in a considerable contribution to the cumulative loss of cultural and tribal cultural resources in Solano County and in portions of the Patwin traditional territory, and this cumulative impact would be potentially significant.

Implementation of Mitigation Measure 3.5-5 would establish protocols for the avoidance and safe handling of any cultural and tribal cultural resources encountered during implementation of the Project. With implementation of this mitigation measure, the Project's contribution to this cumulative impact would be less than considerable, and this impact would be reduced to a Less-than-significant impact level.

F. ENERGY RESOURCES

Threshold: Implementation of the Project, in combination with other cumulative development, would not result in the inefficient, wasteful, or unnecessary use of energy resources?

Finding: Less-than-significant impact. (Draft EIR, Section 3.6, page 3.6-16.)

Explanation: The CEQA Guidelines require consideration of the potentially significant energy implications of a Project. CEQA requires mitigation measures to reduce "wasteful, inefficient and unnecessary" energy usage (Public Resources Code Section 21100, subdivision [b][3]). According to the CEQA Guidelines, the means to achieve the goal of conserving energy include decreasing overall energy consumption, decreasing reliance on natural gas and oil, and increasing reliance on renewable energy sources. In particular, the Project would be considered "wasteful, inefficient, and unnecessary" if it were to violate State and federal energy standards and/or result in significant adverse impacts related to Project energy requirements, energy inefficiencies, energy intensiveness of materials, cause significant impacts on

local and regional energy supplies or generate requirements for additional capacity, fail to comply with existing energy standards, otherwise result in significant adverse impacts on energy resources, or conflict or create an inconsistency with applicable plan, policy, or regulation.

Projects constructed within the State would be in compliance with all applicable federal, State, and local regulations regulating energy usage. For example, PG&E, the electric and natural gas provider to the Project, is responsible for the mix of energy resources used to provide electricity for its customers, and it is in the process of implementing the statewide RPS to increase the proportion of renewable energy (e.g., solar and wind) within its energy portfolio. PG&E has achieved at least a 33 percent mix of renewable energy resources in 2020 and is on track to achieve 60 percent mix of renewable energy by 2030. Other statewide measures, including those intended to improve the energy efficiency of the statewide passenger and heavy-duty truck vehicle fleet (e.g., the Pavley Bill and the Low Carbon Fuel Standard), would improve vehicle fuel economies, thereby conserving gasoline and diesel fuel. These energy savings would continue to accrue over time.

Development throughout the State would comply with all existing energy standards and would not be expected to result in significant adverse impacts on energy resources. For these reasons, cumulative development would not cause an inefficient, wasteful, or unnecessary use of energy resources nor cause a significant impact on any of the thresholds as described by the CEQA Guidelines. Therefore, cumulative impacts associated with energy would be less than significant.

G. GEOLOGY AND SOILS

Threshold: Implementation of the Project, in combination with other cumulative development, would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking or seismic-related ground failure, including liquefaction?

Finding: Less-than-significant impact. (Draft EIR, Section 3.7, pp. 3.7-13 through 3.7-14.)

Explanation: Potentially adverse environmental effects associated with seismic hazards are usually site-specific and generally do not result in cumulative effects. Cumulative projects could be exposed to considerable ground shaking during seismic events, but the development of individual projects would not increase the potential for impacts to occur. Individual development proposals within the vicinity of the Project site would be reviewed separately by the appropriate public agency (i.e., City or County) and undergo environmental review if appropriate. In the event that future cumulative development would result in impacts related to geologic or seismic impacts, those potential project or site-specific impacts would be addressed in accordance with the requirements of CEQA. New buildings would be constructed utilizing current design and construction methodologies for earthquake resistant design as required by relevant regulations. Thus, the cumulative impact regarding strong seismic ground shaking or seismic-related ground failure, including liquefaction, would be less than significant.

Threshold: Implementation of the Project, in combination with other cumulative development, would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Finding: Less-than-significant impact. (Draft EIR, Section 3.7, pp. 3.7-14 through 3.7-15.)

Explanation: Potentially adverse environmental effects associated with seismic hazards, as well as those associated with expansive soils, topographic alteration, and erosion, are usually site-specific and generally do not result in cumulative effects. Cumulative projects could be exposed to considerable ground

shaking during seismic events, but the development of individual projects would not increase the potential for impacts to occur. Individual development proposals within the vicinity of the Project site would be evaluated on a project-by-project basis and by the appropriate public agency (i.e., City or County) and undergo environmental review if appropriate. In the event that future cumulative development would result in impacts associated with unstable geologic units or soils, those potential project or site-specific impacts would be addressed in accordance with the requirements of CEQA. New buildings would be constructed utilizing current design and construction methodologies as required by relevant regulations. Thus, the cumulative impact involving a geologic unit or soil that is unstable, potentially resulting in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse, would be less than significant.

Threshold: Implementation of the Project, in combination with other cumulative development, would not be located on expansive soil, as defined in Tables 18-1-D of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Finding: Less-than-significant impact. (Draft EIR, Section 3.7, page 3.7-15).

Explanation: Potentially adverse environmental effects associated with expansive soils, topographic alteration, and erosion, are usually site-specific and generally do not result in cumulative effects. Individual development proposals within the vicinity of the Project site would be evaluated on a project-by-project basis and by the appropriate public agency (i.e., City or County) and undergo environmental review if appropriate. In the event that future cumulative development would result in impacts associated with expansive soils, those potential project or site-specific impacts would be addressed in accordance with the requirements of CEQA. New buildings would be constructed utilizing current design and construction methodologies as required by relevant regulations. Thus, the cumulative impact involving expansive soils, creating substantial direct or indirect risks to life or property would be less than significant.

Threshold: Implementation of the Project, in combination with other cumulative development, would not or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Finding: Less-than-significant impact with mitigation incorporation. (Draft EIR, Section 3.7, pp. 3.7-15 through 3.7-16.) Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects as identified in the EIR. (State CEQA Guidelines, § 15091(a)(1).)

Explanation: Any project involving earth-moving activity could potentially result in inadvertent discovery and disturbance of paleontological resources during grading and excavation work; these inadvertent discoveries could create potentially-significant impacts.

As indicated in the Dixon General Plan EIR, numerous paleontological resources have been discovered throughout the Sacramento Valley and Solano County regions, and while no paleontological resources have been discovered within the City, there is potential that resources could be found in the future. Future ground disturbing activities associated with project implementation and cumulative projects could have potential to cumulatively impact paleontological resources, and the project would have a cumulatively considerable contribution to that impact. As such, the cumulative impact to paleontological resources would be potentially significant.

The Project would develop land that has been highly disturbed as a result of agricultural activities. Although the land is disturbed, there is a potential to uncover previously unknown paleontological resources. Therefore, the Project would have a cumulatively considerable contribution to the cumulative impact, and the cumulative impact would be potentially significant.

If previously undiscovered paleontological resources are uncovered during ground disturbing activities, Mitigation Measure 3.7-10 would require all work within a 25-foot radius of the find to be suspended until the resource is evaluated by a professional vertebrate paleontologist. If the discovery proves to be significant, before construction activities resume at the location of the find, additional work such as data recovery excavation may be warranted, as deemed necessary by the paleontologist. Implementation of Mitigation Measure 3.7-10 would reduce the potential for impacts to paleontological resources to a Less-than-significant impact level.

H. HAZARDS AND HAZARDOUS MATERIALS

Threshold: Impact 3.9-7: Implementation of the Project, in combination with other cumulative development, would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Finding: Less-than-significant impact. (Draft EIR, Section 3.9, page 3.9-25.)

Explanation: Construction activities associated with future development projects may involve the routine transport, use, or disposal of hazardous materials. However, the construction contractor would be required to use standard construction controls and safety procedures that would avoid and minimize the potential for hazards associated with the transport and use of hazardous materials. Standard construction practices would be observed such that any materials released are appropriately contained and remediated as required by local, State, and federal law.

Existing and future uses within the City are likely to use, store, transport, and dispose of hazardous materials. Residential and commercial uses do not typically involve the use or storage of hazardous substances other than limited quantities of hazardous materials such as solvents, fertilizers, pesticides, and other materials used for regular maintenance of buildings and landscaping. The quantities of these materials would not typically be at an amount that would pose a significant hazard to the public or the environment. Industrial uses may involve the use, generation, storage, or transport of larger amounts of hazardous materials. The use, storage, transport, and disposal of hazardous materials would be governed by existing regulations of several agencies, including the DTSC, EPA, DOT, Cal OSHA, and the Solano County CUPA. Adherence to existing regulations would ensure compliance with safety standards related to the use and storage of hazardous materials, and the safety procedures mandated by applicable federal, State, and local laws and regulations, which would ensure that risks involving the routine transportation, use, storage, or disposal of hazardous materials or hazardous wastes would be cumulatively less than significant.

Threshold: Implementation of the Project, in combination with other cumulative development, would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Finding: Less-than-significant impact. (Draft EIR, Section 3.9, page 3.9-25 through 3.9-26.)

Explanation: Future development sites within the City and vicinity of the Project site could create a significant hazard to the public or the environment through upset and accident conditions involving the release of hazardous materials into the environment. Construction activities associated with project implementation and cumulative development projects could involve demolition, grading, excavation, and other ground-disturbing activities that could temporarily create a significant hazard to the public or the environment through release of hazardous materials. Future site-specific development would be reviewed at the project-level to determine whether any development sites are listed on a hazardous materials site. Any development activities that may occur on documented hazardous materials sites would be required to undergo remediation and cleanup under the supervision of the regulatory agencies, such as DTSC and the

CVRWQCB. Therefore, the cumulative impact of creating a hazard to the public or environment through reasonably foreseeable accident would be less than significant.

Threshold: Implementation of the Project, in combination with other cumulative development, could be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment?

Finding: Less-than-significant impact. (Draft EIR, Section 3.9, page 3.9-26.)

Explanation: Future development projects would be evaluated at the project-level to determine whether any development sites are listed on a hazardous materials site. Any development activities occurring on documented hazardous materials sites would be required to undergo remediation and cleanup under the supervision of federal, State, and local regulations, including the DTSC and the CVRWQCB, prior to construction. Therefore, the cumulative impact of locating development on hazardous materials sites would be less than significant.

Threshold: The Project, in combination with other cumulative development, would not be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, resulting in a safety hazard or excessive noise for people residing or working in the Project site?

Finding: Less-than-significant impact. (Draft EIR, Section 3.9, pages 3.9-26 through 3.9-27.)

Explanation: Future development projects would be evaluated at the project-level to determine if they are located within an airport land use plan or within two miles of a public or public use airport. Future projects located within the Airport Influence Area of the Travis AFB would be reviewed by the ALUC for consistency with applicable standards established in the Travis AFB Land Use Compatibility Plan on a project-by-project basis. Therefore, the cumulative impact of locating cumulative development in an airport land use plan area would be less than significant.

Threshold: Impact 3.9-11: Implementation of the Project, in combination with other cumulative development, would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Finding: Less-than-significant impact. (Draft EIR, Section 3.9, page 3.9-27.)

Explanation: Future development projects could impair implementation of or physically interfere with an adopted emergency response plan. Construction activities associated with project implementation and cumulative development projects could involve demolition, grading, excavation, and other ground-disturbing activities that could temporarily interfere with emergency response plans or emergency evacuation plans. Future development would be designed, constructed, and maintained in accordance with applicable standards, including vehicular access to ensure that adequate emergency access and evacuation would be maintained. Access for emergency vehicles would be required to be incorporated into project design. Construction activities that may temporarily restrict vehicular traffic would be required to implement appropriate measures to facilitate the passage of persons and vehicles through/around any required road closures. Future development projects would be required to comply with applicable City codes and regulations pertaining to emergency response and evacuation plans. Prior to construction, proposed site plans would be required to undergo review by the Fire Department to ensure that adequate emergency access would be maintained within the area. During operation of future projects, the City and/or

County EOP would be implemented and emergency response and evacuation would occur dependent upon the emergency situation, consistent with the respective EOPs. Therefore, the cumulative impact to emergency response would be less than significant.

Threshold: Implementation of the Project, in combination with other cumulative development, wound not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Finding: Less-than-significant impact. (Draft EIR, Section 3.9, page 3.9-27.)

Explanation: There are no areas designated as moderate, high, or very high FHSZs within the City. The area surrounding the City is relatively flat and predominantly agricultural or developed uses, and is not considered at a significant risk of wildlife. Future development projects within the City and vicinity of the Project site are not anticipated to exacerbate fire risks. Therefore, the cumulative impact of exposing future development to significant loss from wildland fires would be less than significant.

I. HYDROLOGY AND WATER QUALITY

Threshold: Implementation of the Project, in combination with other cumulative development, would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Finding: Less-than-significant impact. (Draft EIR, Section 3.10, page 3.10-24.)

Explanation: Cumulative development would increase the amount of impervious surfaces in the city limits, which could affect stormwater runoff water quality. Individual projects would be required to provide stormwater collection and discharge facilities such that water quality is not adversely affected. Future facilities and projects would be subject to the State Water Resources Control Board Requirements (SWRCB), City of Dixon regulations; Phase II, National Pollutant Discharge Elimination System (NPDES) Permit Requirements; NPDES-MS4 Permit Requirements; and LID Guidelines.

Stormwater quality standards imposed and monitored by the Environmental Protection Agency (EPA) and the SWRCB through the NPDES permit require treatment of stormwater runoff prior to its release into drainage features. Therefore, the cumulative impact to stormwater systems would be less than significant.

Threshold: Implementation of the Project, in combination with other cumulative development, would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Finding: Less-than-significant impact. (Draft EIR, Section 3.10, pp. 3.10-24 through 3.10-25.)

Explanation: The City of Dixon has historically relied solely on groundwater from the Solano Subbasin to meet its water demands and plans to continue to use groundwater in the future to meet its demands. The City does not currently use or plan to use surface water or stormwater for beneficial reuse. According to the Solano Subbasin GSP, groundwater recharge within the Solano Subbasin occurs primarily through infiltration and deep percolation of precipitation falling directly on the landscape within the Subbasin and through applied water (e.g., irrigation), seepage from natural surface waterways, seepage from water conveyance systems (e.g., leaky canals, ditches, and pipes), and deeper subsurface recharge from adjacent and upland recharge source areas outside of the Subbasin. The GSP identifies areas with the

highest recharge potential as those occurring along Putah Creek and in the Putah Creek alluvial fan in the northern portion of the Subbasin.

As the city continues to grow, adequate permeable surfaces will need to be incorporated into projects' landscape plans. The City regulates open space requirements, landscaping, and retention and detention basins to provide adequate groundwater recharge opportunities. Therefore, the cumulative impact on groundwater would be less than significant.

Threshold: Implementation of the Project, in combination with other cumulative development, would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in flooding on- or offsite; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flood flows?

Finding: Less-than-significant impact. (Draft EIR, Section 3.10, page 3.10-25.)

Explanation: Cumulative development would increase the amount of impervious surfaces in the city limits, which could increase peak stormwater runoff rates and volumes. Individual projects would be required to provide stormwater collection and discharge facilities such that downstream peak flows do not exceed existing conditions. Future facilities and projects would be subject to the State Water Resources Control Board Requirements (SWRCB), City of Dixon regulations; Phase II, National Pollutant Discharge Elimination System (NPDES) Permit Requirements; NPDES-MS4 Permit Requirements; and LID Guidelines.

Stormwater quality standards imposed and monitored by the Environmental Protection Agency (EPA) and the SWRCB through the NPDES permit require treatment of stormwater runoff prior to its release into drainage features. Therefore, the cumulative impact to stormwater systems would be less than significant.

Threshold: Implementation of the Project, in combination with other cumulative development, would not risk release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones?

Finding: Less-than-significant impact. (Draft EIR, Section 3.10, page 3.10-26.)

Explanation: The city is not located in a flood hazard zone. The City's inland location does not make it prone to effects from tsunamis or seiches. Therefore, cumulative development would not risk release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones, and the cumulative impact would be less than significant.

J. LAND USE

Threshold: The Project, in combination with cumulative development, would not conflict with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted to avoid or mitigate an environmental effect?

Finding: Less-than-significant impact. (Draft EIR, Section 3.11, page 3.11-29.)

Explanation: Cumulative development in the City of Dixon would adhere to the development patterns, density, intensity, land use designations, and development standards outlined in the General Plan and Zoning Ordinance. If future land uses are not consistent with the General Plan, there are two courses

of action: 1) the uses are not allowed due to the inconsistency, or 2) the land uses are changed through an amendment to the General Plan to create consistency. Approval of a General Plan amendment would ensure that future cumulative development in the city would be substantially consistent with the Dixon General Plan land use requirements.

Cumulative land use impacts, such as the potential for conflicts with adjacent land uses and consistency with adopted plans and regulations, are typically site- and project-specific. Each cumulative project would be required to demonstrate consistency with applicable plans, including the City's General Plan. Therefore, cumulative development would not conflict with an applicable land use plan, policy, or regulation, and the cumulative impact would be less than significant.

Threshold: The Project, in combination with cumulative development, would not conflict with an applicable habitat conservation plan or natural community conservation plan?

Finding: Less-than-significant impact. (Draft EIR, Section 3.11, page 3.11-29.)

Explanation: There is not currently an adopted habitat conservation plan or natural community conservation plan for lands in Solano County or the City of Dixon. Therefore, cumulative development would not conflict with such plans. However, there is potential that the Solano HCP could be adopted prior to some anticipated cumulative development. If adoption of the Solano HCP occurs, future cumulative projects would be required to comply with the policies and conservation strategies outlined in the Solano HCP. Therefore, cumulative development would not conflict with a habitat conservation plan or natural community conservation plan, and the cumulative impact would be less than significant.

K. NOISE

Threshold: Could the Project, combined with cumulative development, expose existing noise-sensitive land uses to increased noise?

Finding: Less-than-significant impact. (Draft EIR, Section 3.12, page 3.12-19.)

Explanation: Cumulative noise impacts would occur primarily as a result of increased traffic on local roadways and on-site activities resulting from the operation of the Project. Table 3.12-9 shows cumulative traffic noise levels with and without the Project.

Although construction activities are temporary in nature and would occur during normal daytime working hours, construction-related noise could result in sleep interference at existing noise-sensitive land uses in the vicinity of the construction if construction activities were to occur outside the normal daytime hours. The cumulative noise would be fairly small and would not be substantial in a future noise environment.

The Project, when considered alongside all past, present, and probable future projects, would not be expected to cause any significant cumulative construction noise impacts. The Project would not have cumulatively considerable impacts associated with construction noise. Cumulative traffic noise levels would not be expected to cause significant traffic noise impacts. Therefore, the cumulative impact of noise on sensitive receptors would be less than significant.

L. POPULATION AND HOUSING

Threshold: Implementation of the Project, in combination with other cumulative development, would not induce substantial population growth in the area, either directly or indirectly, and would not displace a substantial number of people requiring the construction of new housing?

Finding: Less-than-significant impact. (Draft EIR, Section 3.13, page 3.13-10 through 3.13-11.)

Explanation: Cumulative development anticipated in the region may result in impacts to residents and housing, including substantial population growth, housing construction, and displacement.

As described above, ABAG projects that population of North Solano County sub-region will increase by approximately 24 percent, from 142,000 in 2015 to 177,000 in 2050, an increase of approximately 91,200 people based on the County average household size of 2.74 persons. The Dixon General Plan 2040 EIR anticipates a total of 9,506 dwelling units and a population of 28,893 within the General Plan Planning Area.

Cumulative development consistent with adopted general plans would not result in substantial unplanned population growth either directly or indirectly. Therefore, the cumulative impact would be less than significant.

M. PUBLIC SERVICES AND RECREATION

Threshold: Would implementation of the Project, in combination with other cumulative development result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection, police protection, schools, parks, or other public facilities?

Finding: Less-than-significant impact. (Draft EIR, Section 3.14, page 3.14-19 through 3.14-21.)

Explanation: This analysis evaluates whether the impacts of implementation of the Project, together with the impacts of cumulative development, would result in a cumulatively significant impact with respect to fire protection facilities, police protection facilities, school facilities, library facilities, parks or recreational facilities, and other municipal services.

Fire Protection Services

The geographic context for the analysis of cumulative impacts related to fire protection services includes the DFD service area. A significant cumulative environmental impact would result if this cumulative growth exceeded the ability of DFD to adequately serve their service area, thereby requiring construction of new facilities or modification of existing facilities. Development anticipated under the Dixon General Plan would require additional facilities beyond the existing singular fire station in the city. Fire Station 82 located at the corner of Pitt School Road and Lavender Lane in the Southwest Dixon Specific Plan area is scheduled to come online in the next few years. The addition of this station would double the City's firefighting capacity and help meet service demands as the City grows.

Implementation of General Plan policies would ensure the adequacy of service by monitoring service areas, encouraging development patterns that facilitate efficient delivery of service, and improving

emergency access by removing significant barriers and enforcing design standards, all of which would help minimize increases in service needs (Policies LCC.1-3, LCC.1-8, LCC.1-9, PSF.1-2, PSF.1-3, and PSF.1-9). Furthermore, individual development projects would be required to pay the City's standard public safety impact fee, in compliance with General Plan Policies PSF.1-5 and PSF.1-6. Cumulative growth in the City would maintain acceptable service ratios, response times, and other performative objectives related to fire protection such that development of a new or expansion of an existing station would not be required. Therefore, the cumulative impact would be less than significant.

Police Protection Services

The geographic context for the analysis of cumulative impacts related to police protection facilities includes the Dixon Police Department service area, which comprises the City of Dixon. A significant cumulative environmental impact would result if cumulative growth exceeds the ability of the Department to adequately serve its service area, thereby requiring construction of new facilities or modification of existing facilities.

Although the City is served by only one police station, the Dixon Police Department is evaluating its existing building to determine whether unused space on the second floor could be used to house additional police services. Plans are currently under development and will be funded by Police impact fees and a recently Federally-acquired grant.

Development of growth anticipated under the General Plan would increase the demand for law enforcement services, which could increase response times or result in the Department not reaching its service goals. In the event of an emergency, the Department would continue to receive mutual aid from additional police departments for which they have a mutual services agreement. Regular updates to the City's Municipal Services Review and collection of the City's public safety impact fee from new development would identify and provide financing tools to fund and maintain facility improvements that help to provide services adequate for development and growth (General Plan Policy PSF.1-5 and Implementing Actions LCC.1-C, LCC.1-E, and LCC.1-F).

Therefore, cumulative development could be served by the existing police facilities in the city, and no new facilities would be required. Therefore, the cumulative impact would be less than significant.

School Facilities

The geographic context for the analysis of cumulative impacts related to school facilities includes the Dixon Unified School District. Regional growth resulting from past, present, and reasonably foreseeable projects would result in increased demand for additional school facilities within the DUSD serving the City of Dixon. Like development in Dixon, the schools are expected to receive development impact fees from cumulative development. Developer payment of standard school impact fees would cover a fair share of any need for new or altered school facilities, and as provided by California Government Code Section 65996, the payment of such fees is deemed to fully mitigate the impacts of new development on school services.

Further, facilities capacity exceeding enrollment due to projects enabled by Measure Q bond proceeds and the District's Facilities Master Plan, there is no need for further expansion or construction of new facilities to serve the District. Therefore, the cumulative impact on schools would be less than significant.

Park and Recreational Facilities

The geographic context for the analysis of cumulative impacts of parks and recreational facilities includes those located within the City boundary. A significant cumulative environmental impact would result if this cumulative growth resulted in an increase in the use of existing parks and recreational facilities,

such that substantial physical deterioration of the parks or recreational facilities would occur, be accelerated, to require the construction of new parks and recreational facilities or modification of existing parks and recreational facilities.

The City's parkland standard is the provision of 5.0 acres of overall parkland, 1.2 acres of neighborhood parkland and 3.8 acres of community parkland per 1,000 residents. The City's current ratio is approximately 4.8 acres per 1,000 residents. Specifically, the provision of neighborhood parks is below the City's established threshold.

The Dixon Parks Master Plan identifies existing park facilities and future needs such that the development of additional facilities can grow with the City's population. Compliance with the Parks Master Plan, development of pipeline parks identified in the Parks Master Plan, and adherence the policies set forth in the General Plan would ensure that adequate parks and recreation facilities are provided as new development comes online. Future development would be required to contribute to acquisition or development of adequate parks and recreational facilities through dedication of parkland or pay in-lieu fees (General Plan Policies LCC.5-6 and PSF.4-3). Therefore, the cumulative impact to parks and recreation facilities would be less than significant.

Library Facilities

The geographic context for analysis of cumulative impacts to library facilities includes the Dixon Carnegie Library. A significant cumulative environmental impact would result if cumulative growth exceeded the ability of the Dixon Carnegie Library to adequately serve people within their service area, thereby requiring construction of new facilities or modification of existing facilities. Compliance with the General Plan would ensure that library services are expanded. All cumulative projects would be required to comply with City ordinances and other policies that address library facilities and services. Therefore, the cumulative impact to libraries would be less than significant.

Other Municipal Services

The geographic context for analysis of cumulative impacts to other municipal services is the City. Cumulative development in the City would increase the demand for various municipal services. Future development in the City would comply with General Plan policies and implementing actions to increase the provision of municipal services as the City's population increases. The allocation of financing for other municipal services is determined annually by the City Council based upon local needs and resources. For these reasons, the cumulative impact on municipal services would be less than significant.

N. TRANSPORTATION

Threshold: Would implementation of the Project, in combination with other cumulative development be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) regarding Vehicle Miles Traveled (VMT)?

Finding: Significant and Unavoidable Impact. (Draft EIR, Section 3.15, page 3.15-28.)

Explanation: The OPR's Technical Advisory indicates that VMT efficiency metrics, such as VMT per resident, may not be appropriate for CEQA cumulative analysis because they employ a denominator. Instead, the Technical Advisory recommends that an impact finding from an efficiency-based project-specific VMT analysis (i.e., Existing Plus Project conditions) would imply an identical impact finding for a cumulative VMT analysis.

As previously stated, the Project would result in a significant impact if the project were to generate home-based VMT per capita or VMT per job exceeding the threshold of 85 percent of the regional average.

Because the Project would generate in excess of the City thresholds for both criteria, the Project exceeds the threshold of 85 percent, and a cumulatively considerable and a significant impact would occur.

Implement Mitigation Measure 3.15-5 involves implementing mitigation measure 3.15-2. As noted previously, implementation of a TDM plan would reduce the amount of VMT associated with the Project, but not to a Less-than-significant impact level. Therefore, the impact would remain cumulatively considerable and significant and unavoidable.

Threshold: Could the Implementation of the Project, in combination with other cumulative development substantially increase hazards due to a geometric design feature or incompatible uses.?

Finding: Less-than-significant impact. (Draft EIR, Section 3.15, pp. 3.15-28 through 3.15-29.)

Explanation: *Impacts to Caltrans Facilities*

For the 2040 scenario, the TIA recalculated the operations at the two study intersections using projected traffic volumes. Both intersections were still assumed to be operating as all-way stop-control.

Queue lengths for the cumulative with and without project scenario are shown in Table 3.15-8. Given the 1,200-foot distance to the gore points at both intersections, the analysis clearly shows that the project-generated traffic is not expected to cause traffic queues to spill back to the gore points for any of the movements analyzed during both AM and PM peak hours. Therefore, based on the findings from the TIA, the project-related traffic in the Year 2040 cumulative scenario is not expected to cause significant impacts at these Caltrans facilities in terms of causing traffic to spill back to gore points.

Impacts to Incompatible Uses

By 2040, even though some intersections are projected to operate below the city's LOS D threshold, implementing recommended measures would mitigate potential traffic concerns at the following study intersections on Pedrick Road:

- Pedrick Road / I-80 Westbound Ramps – Sievers Road
- Pedrick Road at I-80 Eastbound Ramps – Sparling Lane
- Pedrick Road at Professional Drive

The TIA recommended that the project should contribute its fair share to the cost of regional circulation improvements via the existing citywide traffic impact mitigation fee program, including constructing signals at these three intersections as well as geometric upgrades to some approaches where storage lengths are exceeded.

O. UTILITIES AND SERVICE SYSTEMS

Threshold: Would the Project, in combination with other cumulative development not exceed the provider's capacity to serve future projected demand in addition to the provider's existing commitments?

Finding: Less-than-significant impact. (Draft EIR, Section 3.16, page 3.16-9.)

Explanation: As cumulative projects come online within the WWTP service area, the wastewater collection, conveyance, and treatments systems would continue to grow, consistent with the City's existing infrastructure requirements. New sanitary sewer mains could be added as projects are proposed. The City still owns the 430 acres of the original WWTF site. Treated effluent that is generated at

the WWTF is disposed of through land application with no discharge to any of the open channels or creeks near the WWTF. Within the City's 14-acre site, there is space to further expand the WWTF beyond 2.5 MGD without reducing the area used for land application.

Because the WWTF can be expanded to accommodate treatment and disposal of the projected cumulative flows in the city, and because of the Plan policies, this cumulative impact is considered less-than-significant regarding wastewater treatment capacity.

Threshold: Would the Project, in combination with cumulative development, not require construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects, or have inadequate water supply?

Finding: Less-than-significant impact. (Draft EIR, Section 3.16, pp. 3.16-24 through 3.16-25.)

Explanation: The City of Dixon is entirely reliant on groundwater for its water supply. The City serves groundwater supplies within a portion of the current City limits, with groundwater produced from the Solano Groundwater Subbasin. The City is a participant in the Solano Subbasin Groundwater Sustainability Agency (SSGSA) for the purpose of working collaboratively to sustainably mange the groundwater basin as required by the Sustainable Groundwater Management Act of 2014 (SGMA).

Buildout of the City's General Plan would require 1,058 AFY or 0.94 MGD of water supply. For planning purposes, the City assumes a firm existing firm water supply is 4,200 gpm (6.0 MGD or 6,800 ac-ft/yr). The WSMP recommends four additional wells be constructed to meet the buildout demand projections. The total buildout supply capacity with the recommended new wells is projected to be 14,500 gallons per minute (gpm) (20.8 MGD or 23,400 ac-ft/yr) with the firm supply capacity (assuming the largest well out of service) to be 12,000 gpm (17.3 MGD or 19,400 ac-ft/yr).

The City will have enough water because 1) Policy PSF.2.2 requires the City to expand the its water supply system, including wells, pipelines and storage facilities, in order to meet future need as development occurs, particularly in (but not limited to) the Northeast Quadrant and in Southwest Dixon, and 2) Policy PSF.2.3 requires the City to improve the reliability of the City's water system to meet future demand, including through the construction of additional wells and the identification of potential surface water supply sources. Additionally, the City collects water rates and impact fees to fund the operation, maintenance, and expansion of the water system.

Because the City will be served by groundwater supplies and new groundwater well facilities can be constructed to increase water supply production, and because the City is an active participant in the SSGSA to sustainably manage the groundwater basin, this cumulative impact is considered less than significant.

Threshold: Would the Project, in combination with other cumulative development, not have the potential to require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Finding: Less-than-significant impact. ((Draft EIR, Section 3.16, pp. 3.16-35 through 3.16-36.)

Explanation: Currently the city and regional agencies are working on a master drainage plan for the entire Tremont 3 Watershed. Regional flooding after large events is a known issue in the area. A series of culverts, conveyance systems, and other storm drainage infrastructure have been constructed over time

to address the issue. Stormwater drainage, and the need to construct additional storm drainage facilities is a potentially significant cumulative impact.

The Project would retain storm water onsite and would not discharge waters offsite such that a substantial increase in flows occurs. If a regional plan is approved, the proposed retention basin would be converted to a detention with a pump outfall with a discharge rate of 5.14 cubic feet per second (cfs) [0.011 cfs per acre]. If the regional drainage planning effort is approved, the off-site flows will be conveyed around the northeast quadrant via a pass-through storm drain linear basin adjacent to Interstate 80 where it will be collected at the north end of the linear basin in a pipe / ditch system. The flows would be routed via the pipe system to existing UPRR culvert.

The following summarizes the design elements should the proposed retention basin be converted to a regional detention facility in the future:

- Detention storage shall mitigate the increase of the post-development 100-year, 4-Day peak runoff from the project to the DRCD historic discharge rate of 0.011 cfs/acre.
- The detention basin side slopes shall be no steeper than 4:1 in areas subject to inundation.
- The detention basin is approximately 20 feet deep, exceeding the City's preferred maximum depth of 10 feet. Additional depth is required to avoid conflicts with underground utilities and due to the large pipe sizes required to collect the entire undeveloped NEQSP areas west of Pedrick Road. Groundwater data from a well located on the eastern side of the site indicated the depth of groundwater ranged from 35 to 82 feet.

If the proposed retention basin is converted to a future detention basin, it would be constructed to maintain the post-development 100-year 4-day flow rates to of the historic Dixon Regional Watershed Joint Powers Agreement peak flow rates of 0.011 cfs/acre. Due to topographical restraints, a future detention basin would have a new storm drain pump station to fully drain the basin and to regulate the discharge.

The Project would manage stormwater flows onsite, without adversely affecting downstream flows. In the event that a regional plan is developed, the proposed retention basin could be converted to a detention basin and be a key part of the overall regional plan for managing stormwater. Therefore, the Project would not have a considerable contribution to regional stormwater flooding, and the cumulative impact would be less than significant.

Threshold: Would the landfills that serve the Project, in combination with other cumulative development, have sufficient permitted capacity to accommodate the Project's and cumulative developments' solid waste disposal needs, and will comply with federal, State, and local statutes and regulations related to solid waste?

Finding: Less-than-significant impact. (Draft EIR, Section 3.16, page 3.16-41.)

Explanation: Solid waste generated in the City of Dixon is currently disposed at the Recology Hay Road Landfill. Currently, the Recology Hay Road Landfill (48-AA-0002) has a permitted capacity of 2,400 tons per day, with an estimated total permitted capacity of 37,000,000 cubic yards. The total estimated remaining capacity used, as of 2024, was 30,433,000 cubic yards. The estimated closure date of the currently permitted facility is January 1, 2077.

Cumulative development areas served by the Recology Hay Road Landfill could continue to use the landfill's capacity for more than 50 more years. As a result, the landfill could accommodate future development, and the cumulative impact would be less than significant.

SECTION 6. FINDINGS REGARDING GROWTH-INDUCING IMPACTS

The State CEQA Guidelines requires a Draft EIR to discuss the ways in which the Project could foster economic or population growth or the construction of additional housing, directly or indirectly, in the surrounding environment. Under State CEQA Guidelines section 15126.2(e), a project would be considered to have a growth-inducing effect if it would result in any of the following effects:

- Induce substantial population growth in an area (for example, by proposing new homes and commercial or industrial businesses beyond the land use density/intensity envisioned in the general plan);
- Substantially alter the planned location, distribution, density, or growth rate of the population of an area; or
- Include extensions of roads or other infrastructure not assumed in the general plan or adopted capital improvements project list, when such infrastructure exceeds the needs of the project and could accommodate future developments.

There are two types of growth-inducing impacts: direct and indirect. To assess potential for growth-inducing impacts, General Plan Elements that may encourage and facilitate activities that individually or cumulatively may affect the environment must be evaluated (CEQA Guidelines Section 15126.2(e)). CEQA Guidelines, as interpreted by the City, state that a significant growth-inducing impact may result if implementation of the Project would:

- Induce substantial population growth in an area (for example, by proposing new homes and commercial or industrial businesses beyond the land use density/intensity envisioned in the general plan);
- Substantially alter the planned location, distribution, density, or growth rate of the population of an area; or
- Include extensions of roads or other infrastructure not assumed in the general plan or adopted capital improvements project list, when such infrastructure exceeds the needs of the project and could accommodate future developments. (Draft EIR, pp. 4-6 through 4-7.)

Direct growth-inducing impacts occur when development imposes new burdens on a community by directly inducing population growth, or by leading to construction of additional developments in the same area. Secondary impacts can include the removal of physical obstacles to population growth (such as a new road into an undeveloped area or a wastewater treatment plant with excess capacity that could allow additional development in the service area). Construction of these types of infrastructure cannot be considered isolated from the development they facilitate and serve. Physically removing obstacles to growth, or indirectly inducing growth may provide a catalyst for future unrelated development in an area, such as a new residential community that requires additional commercial uses to support residents. (Draft EIR, p. 4-7.)

Implementing the Project would continue the planned for growth in the City in a manner consistent with the designated land use of the City General Plan. The California Department of Finance estimated the total population of the City of Dixon to be 19,018 as of 2023. The City projects a population of 28,893 by 2040 based on buildout of the General Plan. The project would result in the construction of 1,041 dwelling units. Using an average household size of 2.87 the Project would result in the addition of approximately 2,988 residents to the City, or 10.3 percent of the total projected 2040 population. Therefore, direct population growth as a result of the Project would occur, but was anticipated as part of the city's overall growth pattern and planning in the 2040 General Plan. The potential environmental impacts resulting from this direct population growth is analyzed in Sections 3.1 through 3.16 of this EIR. (Draft EIR, p. 4-7.)

The Project would also not significantly or adversely affect the permanent jobs/housing balance. Implementation of the Project would allow for creation of approximately 687,000 square feet of nonresidential uses, such as service commercial and the Dixon Opportunity Center. Development associated with the Project would provide for employment opportunities, particularly during construction phases. Therefore, implementing the Project would help the city achieve a more even job/housing balance by providing much-needed housing. (Draft EIR, pp. 4-7 through 4-8.)

Implementing the Project would not require extensions of electrical, natural gas, or water utility infrastructure beyond the needs of the Project, but would require connections to existing infrastructure on and adjacent to the project site. A small sewer connection is needed at the southwest corner of the project site along Vaughn Road to allow for a future southern sewer connection through the NEQSP area. The Project would not extend urban infrastructure other than to future projects anticipated under the City's General Plan, such as the planned NEQSP area, and thus would not induce growth in other areas outside the City limits. Growth inducement to the undeveloped agricultural land to the east of the Project site, across Pedrick Road, would not occur as that land is designated as Agricultural in the County's General Plan. The Project would not oversize or extend infrastructure to that area, and would not induce growth beyond that anticipated under the City's General Plan. (Draft EIR, p. 4-8.)

Furthermore, the Project would be compatible with other planned growth within the NEQSP area as future development would be guided by the Specific Plan, as would the Project. Areas outside of the NEQSP area would not be pressured to redevelop with new or different land uses as there is planned growth capacity within the NEQSP area and anticipated under the General Plan. Although there are a few existing residential units immediately south of the Project site, neither the Project nor further development within the NEQSP area would require nearby residents to relocate as residential uses are compatible with the uses anticipated in the NEQSP. Therefore, the Project would not remove a barrier to growth nor create an indirect population increase. (Draft EIR, p. 4-8.)

Infrastructure and services would be expanded as necessary to serve City growth, without significant excess capacity, and thus would not encourage additional growth beyond that already planned for in the Project. As a result, the Project would create minimal to no indirect growth, and the planned buildout would be consistent with City projections. (Draft EIR, p. 4-8.)

Since the Project would not result in indirect growth, negatively alter the existing jobs/housing balance, or be inconsistent with the City General Plan, growth-inducing impacts would be less than significant. (Draft EIR, p. 4-8.)

SECTION 7. FINDINGS REGARDING ALTERNATIVES

The EIR analyzed three alternatives to the Project and evaluated these alternatives for their ability to avoid or reduce the Project's significant environmental effects while also meeting the majority of the Project's objectives.

A. PROJECT OBJECTIVES

The following objectives have been established for the Project:

1. Create a Project consistent with the Property's Campus Mixed Use General Plan designation.
2. Expand and enhance the City's employment base and reduce the City's current jobs/housing imbalance thereby contributing to the City's economic development goals.
3. Create a campus neighborhood where residential units support the employment-based uses.
4. Create a neighborhood providing residents the opportunity to walk or bike to work in the

neighborhood's employment area.

5. Provide a mix of housing and densities, including apartments, small lot and larger lot single family homes.
6. Create home ownership opportunities for the missing middle.
7. Create rental residential opportunities adjacent to employment uses.
8. Create an employment base area that will be more attractive to employers due to the proximity of complementary residential uses.
9. Provide a residential unit count necessary to pay the cost of extending needed infrastructure to the employment base portion of the Project and the remaining undeveloped properties in the Northeast Quadrant Specific Plan.
10. Provide stormwater management facilities that address the impacts of the Project, but also opportunities for more regional stormwater management facilities. (Draft EIR, pp. 2-1 through 2-2.)

B. ALTERNATIVE SITE CONSIDERED BUT DISMISSED FROM FURTHER CONSIDERATION

CEQA does not require that an analysis of alternative sites be included in an EIR. However, if the surrounding circumstances make it reasonable to consider an alternative site, then an EIR may appropriately consider and analyze alternative sites. An EIR is required to identify any alternatives that were considered by the lead agency but were rejected as infeasible. Among the factors described under Section 15126.6(c) of the Guidelines in determining whether to exclude alternatives from detailed consideration in an EIR are failure to meet most of the basic objectives of the project, infeasibility, or inability to avoid significant environmental impacts.

With respect to the feasibility of potential alternatives, Section 15126.6(f)(1) states the following: *"Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries ... and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site."*

If no feasible alternative locations exist, the agency must disclose the reasons for this conclusion. (State CEQA Guidelines, § 15126.6(f)(2)(B).)

A Notice of Preparation (NOP) was circulated to the public to solicit recommendations for a reasonable range of alternatives to the Project. Additionally, a public scoping meeting was held during the public review period to solicit recommendations for a reasonable range of alternatives to the Project. No specific alternatives were submitted by commenting agencies or general public during the NOP public review process.

The City of Dixon considered alternative locations early in the public scoping process. The City's key considerations in identifying an alternative location were as follows:

- Is there an alternative location where significant effects of the Project would be avoided or substantially lessened?
- Is there a site available within the City's Sphere of Influence with the appropriate size and characteristics such that it would meet the basic Project objectives?

The City's consideration of alternative locations for the Project included a review of previous City land use planning and environmental documents, including the General Plan. The search included a review of land

in Dixon that is located within the Sphere of Influence, suitable for development, available for purchase by the Project Applicant, of sufficient size to accommodate the Project, and not already approved for or pending development. It was found that there are numerous approved projects and proposed Projects that are currently under review in Dixon. These approved and proposed Projects are not available for acquisition by the Project applicant and are therefore not considered feasible alternative sites. The City has found that there are no feasible alternative locations that exist within the City's Sphere of Influence with the appropriate size and characteristics that would meet the basic Project objectives and avoid or substantially lessen a significant effect. For these reasons, the City determined that there are no feasible alternative locations for the Project. (Draft EIR, pp. 5-2 through 5-3.)

C. ALTERNATIVES SELECTED FOR ANALYSIS IN THE EIR

1. Alternative 1: No Project (No Build)

CEQA Guidelines Section 15126.6(e) requires an EIR to evaluate a "no project" alternative, which is defined as what would be reasonably expected to occur in the foreseeable future if the project were not approved. Under Alternative 1, no urban uses would develop on the Project site. The entire Project site would remain vacant and agricultural operations would continue. There would be no progress toward implementation of the NEQSP or the General Plan. No roadway improvements along Pedrick Road and Professional Way, or other roadway extensions, would be constructed; therefore no safety improvements for Pedrick Road would be implemented. A new retention basin at the southern end of the Project site would not be constructed, and stormwater runoff, and the management thereof, would continue as-is.

The NEQSP would not be amended. The Project site would not be rezoned to CAMU from PAO, ML, and CN to be consistent with the City's General Plan and would not change the existing Zoning Map. Although the Project site is currently zoned for industrial and mixed-use development, under Alternative 1, the Project site would remain undeveloped and continue operating as farmland for the near term.

Comparison Analysis of Environmental Effects

Impacts identified as being the same as or similar to those Project: The No Project (No Build) Alternative would result in no changes to land use and would have no development. The No Project (No Build) Alternative would not induce substantial population increase that has not already been accounted for as a part of the approved General Plan, or analyzed in detail in this EIR. Because the No Project (No Build) Alternative would not add any additional population, would not displace substantial numbers of people, and would not change land use patterns, impacts related to land use and population would be the same or similar to the Project.

Impacts identified as being less severe than those of the Project: The development of the Project site in the existing vacant setting into the Project would physically alter the existing scenic vistas and visual character of the area. Under the No Project (No Build) alternative, no development would occur, and the existing scenic vistas and visual character of the area would remain unchanged. The natural landscape, including scenic vistas and visual character, would be preserved without any alterations. Therefore, the No Project (No Build) Alternative is expected to have a lesser impact on aesthetic and visual impacts.

The conversion of vacant farmland into the Project would result in the loss of important agricultural land. Under the No Project (No Build) Alternative, the farmland would remain undeveloped, continuing for the time being its agricultural use. Therefore, the No Project (No Build) Alternative is expected to have a lesser near-term impact on agriculture resources than the Project.

Under the No Project (No Build) Alternative, there will be no additional construction or development activities, resulting in minimal changes to air quality compared to existing conditions. In contrast, the Project involves construction, increased vehicular traffic, and operational activities, which could lead to localized air pollution from emissions. Therefore, the No Project (No Build) Alternative is expected to have a lesser impact on air quality.

Under the No Project (No Build) Alternative, the Project would not be constructed, no existing biological resources or habitat would be removed, and no ground disturbing activities would occur. As such, these impacts would be reduced when compared to the Project.

The No Project (No Build) Alternative would not involve new construction that could be subject to seismic, geologic or soils hazards; thus, this alternative would have no potential for impact.

Under the No Project (No Build) Alternative, no new land uses would be introduced to the Project site, and the potential for hazardous material release on the Project site would be eliminated. As such, this impact would be reduced when compared to the Project.

Under the No Project (No Build) Alternative, potential water quality impacts from construction and operation of the Project would be eliminated. While groundwater recharge is not considered a significant impact under the Project, under this alternative, the land will be kept in its present state with the majority of the Project site being used for agricultural purposes. The infiltration rate of the soils on the Project site is primarily considered high. The Project site is not a major source of groundwater recharge due to the lack of precipitation and the absence of a major water source. The No Project (No Build) Alternative will have a greater chance of groundwater recharge because it does not introduce large areas of impervious surfaces as would the Project. As such, potential impacts related to hydrology and water quality would be reduced under the No Project (No Build) Alternative when compared to the Project.

Under the No Project (No Build) Alternative, the Project site would remain undeveloped and there would be no increased demand for public infrastructure and utility systems, including water supply systems, energy, and public services or recreation. The recreational amenities within the Project, however, would not be developed for community use. The No Project (No Build) Alternative would have a reduced impact when compared to the Project because demand on public services would be reduced compared to the Project.

With no new development, the No Project (No Build) Alternative would maintain existing traffic patterns and transportation infrastructure, and not add any traffic volumes to the transportation network. In contrast, the Project would lead to increased vehicular traffic, congestion, and demand for transportation services. Thus, the No Project (No Build) Alternative would have fewer impacts on traffic and transportation systems.

Impacts identified as being more severe than those of the project: There are no impacts from the implementation of the No Project (No Build) Alternative that would be greater than the Project.

Relationship to Significant and Unavoidable Impacts

Currently, the majority of the Project site is used for agricultural purposes. The No Project (No Build) Alternative would result in no development on the Project site. As such, this alternative would have no impact on agricultural land, no potential for conflicts with existing agricultural resources, and no potential for conflict with regulations and plans intended to protect those resources. The No Project (No Build) Alternative would eliminate the significant and unavoidable impact of converting Important Farmland. As such, this impact would be reduced when compared to the Project.

Under the No Project (No Build) Alternative, the Project site would not be developed, and there would be no net change in emissions and no potential for a conflict with any adopted plans or policies related to air quality. Implementation of the No Project (No Build) Alternative would eliminate the significant and unavoidable air quality and emissions impacts of the Project. As such, this impact would be reduced when compared to the Project.

The No Project (No Build) Alternative would not introduce additional vehicle, pedestrian, or bicycle travel on the area roadways. The No Project (No Build) Alternative would have a reduced traffic impact when compared to the Project Therefore, implementation of the No Project (No Build) Alternative would eliminate the significant and unavoidable VMT impacts associated with the Project.

Relationship to Project Objectives

Development under the No Project (No Build) Alternative would achieve none of the Project objectives as the alternative would not implement a project consistent with the site's Campus Mixed Use General Plan designation; expand and enhance the City's employment base and reduce the City's current jobs/housing imbalance thereby contributing to City economic development goals; create a campus neighborhood where residential units support the employment-based uses; create a neighborhood providing residents the opportunity to walk or bike to work in the neighborhood's employment area; provide a mix of housing and densities, including apartments, small lot and larger lot single family homes; create home ownership opportunities for the missing middle; create rental residential opportunities adjacent to employment uses; create an employment base area that will be more attractive to employers due to the proximity of complementary residential uses; provide a residential unit count necessary to pay the cost of extending needed infrastructure to the employment base portion of the Project and the remaining undeveloped properties in the Northeast Quadrant Specific Plan; and provide stormwater management facilities that address the impacts of the Project, but also opportunities for more regional stormwater management facilities.

2. Alternative 2: No Project/Existing General Plan/Industrial Uses Only

It is common under CEQA to evaluate a no project/existing designations or existing zoning alternative to a Project. Under present conditions, the Project site is currently zoned as Professional & Admin Office (PAO-PUD), Neighborhood Commercial (CN-PUD), and Light Industrial (ML-PUD). However, State law requires vertical consistency between a property's General Plan designation and its zoning. The existing General Plan designation of Campus Mixed Use (CAMU) is not compatible with the site's existing zoning. To comply with this requirement, development of the Project site cannot be analyzed under its existing zoning. Consequently, this section analyzes development of the Project site under the CAMU land use designation, but only with non-residential/industrial land uses assumed. Per the City's interpretation of its Zoning Code, a single use could be developed under the CAMU land use designation and the existing zoning on the site provided that there are no residential uses. This alternative reflects that interpretation.

For purposes of analysis, Alternative 2 assumes that the majority of the Project site would build out as light industrial uses (209 acres) and include a larger stormwater drainage basin than proposed under the Project (30 acres), similar to what would be allowable under the site's existing general plan designations. A well site in the northwest portion of the Project site would be included in Alternative 2, as it is in the Project. Figure 5-1 depicts the land uses for Alternative 2 and Table 5-2 provides the land use summary.

Comparison Analysis of Environmental Effects

Impacts identified as being the same or similar to those of the Project: Because the No Project/Existing General Plan/Industrial Uses Only Alternative would develop the same total area as the Project, impacts determined by the development footprint of future projects would be substantially the same as the Project. These impacts would include the conversion of Important Farmland, disturbance to special-status species, riparian habitats (Impact 3.4-1); sensitive natural communities, wetlands, waters of the United States (Impact 3.4-2); migratory fish or wildlife species (Impact 3.4-3); damage to historic, archaeological, paleontological, and tribal cultural resources (Impacts 3.5-1, 3.5-2, 3.5-3, 3.5-4); or substantial alteration of drainage patterns resulting in erosion or siltation (Impact 3.10-3).

The No Project/Existing General Plan/Industrial Uses Only Alternative would consist of developing urban uses and adding artificial lighting to the site, including lighting for streets, sidewalks, and parking lots. Security lighting on the sides of industrial buildings would also be present. These light sources would be shielded downward, similar to the Project.

Impacts identified as being less severe than those of the Project: Growth projections would be lower under Alternative 2 compared to the Project as no housing would be constructed, and there would be no impact to population or housing (Impacts 3.12-1 and 3.12-2).

Therefore, population demand-related impacts would be less under Alternative 2, including for public infrastructure and utility systems, including water supply systems (Impacts 3.15-1 through 3.15-6); public services and recreation (Impacts 3.13-1 through 3.13-4); and energy (Impacts 3.5-1 through 3.5-3). In particular, the No Project/Existing General Plan/Industrial Uses Only Alternative would have a lower water demand than the Project. The Project would have a water demand of 191 MG/year, while Alternative 2 would have a demand for 102 MG/year (Impacts 3.16-5 and 3.16-6).

Exposure of residents to potential hazards would also be slightly less under Alternative 2 because there would be no residents as compared to the Project. Impacts related to geology and seismicity (Impacts 3.6-1 through 3.6-7), hazards and hazardous materials (Impacts 3.8-1 through 3.8-6), and hydrology and water quality (Impacts 3.9-1 through 3.9-9) would be less than under the Project.

Impacts identified as being more severe than those of the project: This alternative would develop 209 acres with impervious surfaces, which could result in additional stormwater runoff from the Project site. Instead of having landscaped areas throughout the Project site, this alternative would not include parks, landscaped paseos, or open space areas that could absorb stormwater across the site. Instead, more runoff would be funneled to the drainage basin in the southeast portion of the site. This increase in runoff, however, would result in needing a larger capacity drainage basin when compared to the Project. Although the larger drainage basin would be approximately 30 acres under this alternative and sized to handle the increase in runoff from the Project site, the No Project/Existing General Plan/Industrial Uses Only Alternative would have a greater hydrology and stormwater impact than the Project.

Although no residents would occupy the Project site under Alternative 2, workers would be present onsite. Due the anticipated industrial nature of the No Project/Existing General Plan/Industrial Uses Only Alternative, it is possible that those uses could handle hazardous materials. However, existing regulations would govern the use of potential chemicals.

Relationship to Significant and Unavoidable Impacts

Currently, the Project site is used for agricultural purposes. As the Project would convert the entire Project site from agricultural uses to urban uses, the No Project/Existing General Plan/Industrial Uses Only Alternative would do the same. All 259.61 acres of the project site would be developed with industrial uses and a retention basin. As such, this alternative would not reduce the impacts to agricultural lands when

compared to the Project. The loss of the agricultural land, including prime farmland, would be a significant and unavoidable impact under both the No Project/Existing General Plan/Industrial Uses Only Alternative and the Project. Therefore, the No Project/Existing General Plan/Industrial Uses Only Alternative would have equal, significant and unavoidable impacts on agricultural resources when compared to the Project.

Air emissions under Alternative 2 likely would be some degree less than the amounts of air emissions dispersed under the Project. However, workers would continue to use vehicles to arrive at and depart from the Project site. The traffic pattern would be different as workers would likely be traveling during the AM and PM peak hours, as opposed to a more dispersed timeframe of travel that occurs with residential uses. Uses in the No Project/Existing General Plan/Industrial Uses Only Alternative would be required to adhere to the same mitigation measures as the Project such as achieving Title 24 energy efficiency for all buildings, use of newer construction and operational equipment, and controlling dust during construction activities. Even with the implementation of mitigation measures, impacts under the No Project/Existing General Plan/Industrial Uses Only Alternative would remain significant and unavoidable.

Development of the Project site with all industrial uses would result in the generation of traffic, particularly during AM and PM peak hours as people come to and depart from this employment use. Vehicle miles traveled per job would be over the threshold established (14.2 VMT/job), and would be higher under this alternative (16.8 VMT/job) as compared to the Project (16.3 VMT/job). Transportation impacts under the No Project/Existing General Plan/Industrial Uses Only Alternative would remain significant and unavoidable.

Relationship to Project Objectives

Alternative 2, No Project/Existing General Plan/Industrial Uses Only Alternative would meet perhaps three of the ten Project objectives, but none of the seven priority objectives related to housing would be met. The No Project/Existing General Plan/Industrial Uses Only Alternative would provide stormwater management facilities large enough to address the stormwater runoff volumes anticipated from development of the entire parcel, and it would provide a future opportunity to tie into regional stormwater solutions, if a regional solution is realized. Further, the No Project/Existing General Plan/Industrial Uses Only Alternative would create a large employment base, the development of the site as a wholly employment use would improve the jobs/housing imbalance that exists in the City.

The No Project/Existing General Plan/Industrial Uses Only Alternative would not provide any residential units, and, therefore, would not create home ownership opportunities, would not create residential areas to support employment-based uses, would not create a neighborhood mixing a variety of uses and residential types, and would not provide a residential unit count necessary to pay the cost of extending needed infrastructure to the employment base portion of the project and the remaining undeveloped properties in the Northeast Quadrant Specific Plan area.

3. Alternative 3: Increased Non-Residential/Decreased Residential

This alternative considered development of the northern portion of the Project site, approximately half of the site's acreage, as light industrial, similar to how the site may build out under existing zoning conditions. The light industrial area would cover approximately 118.81 acres, and be the closest use to I-80. A well site would be included in the northwest corner of the Project site, as it would under the Project.

The southern portion of the Project site would be developed with uses similar to the Project, including light, medium, and high density residential; community commercial; parks; and a drainage basin. The number of dwelling units and their associated residential acreage would decrease by approximately half as compared to the Project. The parks acreage would have a commensurate reduction in size. The

acreage for both the service commercial and light industrial uses would increase by approximately 2.5 times.

The drainage basin would increase from 25.14 acres to 28 acres because more of the Project site would be converted to impervious surfaces than under the Project. Figure 5-2 depicts the land uses for Alternative 3 and Table 5-3 provides the land use summary.

Comparative Analysis of Environmental Effects

Impacts identified as being the same as or similar to those of the Project: Because the Increased Non-Residential/Decreased Residential would develop the same total area as the Project, impacts determined by the development footprint of future projects would be substantially the same as the Project. These impacts would include disturbance to special-status species, riparian habitats (Impact 3.4-1); sensitive natural communities, wetlands, waters of the United States (Impact 3.4-2); migratory fish or wildlife species (Impact 3.4-3); damage to historic, archaeological, paleontological, and tribal cultural resources (Impacts 3.5-1, 3.5-2, 3.5-3, 3.5-4); or substantial alteration of drainage patterns resulting in erosion or siltation (Impact 3.10-3).

The Increased Non-Residential/Decreased Residential Alternative would consist of developing urban uses and adding artificial lighting to the site, including lighting for streets, sidewalks, and parking lots. Security lighting on the sides of industrial buildings would also be present. Lighting sources associated with parks, paseos, and residential units would also be present These light sources would be shielded downward, similar to the Project.

Noise levels would also be similar to the Project as a variety of uses would be developed on the Project site. Any noise differences between the Project and the Increased Non-Residential/Decreased Residential would be small and spread across the area, and no difference in noise levels (Impact 3.12-1 through Impact 3.12-4) under the Increased Non-Residential/Decreased Residential Alternative would be detected.

Similar to the Project, the Increased Non-Residential/Decreased Residential Alternative would not result in unplanned population growth such that the provision of new housing would be required. The alternative would appropriately plan for population growth in the city, and there would be no impact (Impacts 3.13-1 and 3.13-2).

The Increased Non-Residential/Decreased Residential Alternative would have approximately the same demand for public utilities including water supplies (Impact 3.16-1 through and Impact 3.16-8) even though fewer housing units would be developed. The corresponding increase in industrial acreage on the Project site may still require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, similar to the Project, in order to serve the development on the site. Similar to the Project, energy usage would not be wasteful, inefficient, or unnecessary as units would be constructed to Title 24 standards (Impact 3.6-1).

Impacts identified as being less severe than those of the Project: This alternative would reduce the number of housing units from 1,041 to 524, a 50 percent reduction in the number of units, while doubling the size of the Dixon Opportunity Center employment use.

The presence of fewer homes as compared to the Project would result in the demand for fewer public services such as police protection, fire protection, and schools. Further, there would be less demand of recreational facilities as there would be fewer residents.

Impacts identified as being more severe than those of the Project: Development of the Project site with more industrial uses and less residential uses would result in the generation of traffic, particularly during AM and PM peak hours as people come to and depart from the employment use. Vehicle miles traveled per job and per resident would be over the threshold established and would be higher under this alternative as compared to the Project. Transportation impacts under the Increased Non-Residential/Decreased Residential Alternative would remain significant and unavoidable.

Relationship to Significant and Unavoidable Impacts

Currently, the majority of the Project site is used for agricultural purposes. The Increased Non-Residential/Decreased Residential Alternative would still result in the complete development of the Project site, and would irreversibly convert Important Farmland to urban uses. As such, this alternative would not reduce the impacts to agricultural lands when compared to the Project. The loss of the agricultural land, including prime farmland, would be a significant and unavoidable impact under both the Increased Non-Residential/Decreased Residential Alternative and the Project. Therefore, the Reduced Residential Units Alternative would have equal impacts on agricultural resources when compared to the Project.

Implementation of the Project would cause an increase in traffic, which is the dominant source of air emissions associated with the Project. Under the Increased Non-Residential/Decreased Residential Alternative, the Project site would be developed with the same components as described in the Project Description. However, the land use mix would introduce more industrial and employment square footage as compared to the Project. The Increased Non-Residential/Decreased Residential Alternative would also reduce the amount of residential development on the site as compared to the Project, thereby reducing the number of people who could live near the Alternative's employment center. The total development would be equal to the Project. Therefore, the amount of traffic generated from the Project site would be equal under this alternative and the Project. Mobile source air emissions are directly correlated to traffic volume; therefore, it is estimated that the similar trip volume would result in a similar amount of the mobile source emissions. Additionally, the area source emissions would be similar to the Project.

Uses in the Increased Non-Residential/Decreased Residential Alternative would be required to adhere to the same mitigation measures as the Project. The Increased Non-Residential/Decreased Residential would result in similar air emissions when compared to the Project, and would remain significant and unavoidable.

The Increased Non-Residential/Decreased Residential Alternative would have a mix of housing and employment uses. As such, it is possible for people to live near their job, resulting in a shorter commute. However, because the number of residential uses would be decreased by half as compared to the Project, Alternative 3 would be a jobs-heavy project, resulting in employees commuting into the site from elsewhere. While reducing the number of residential units within the Project site will slightly reduce the trip generation of vehicles and VMT impacts, implementation of Alternative 3 would still be expected to result in a significant and unavoidable VMT impact (Impact 3.15-2 and Impact 3.15-5), the same as the Project.

Relationship to Project Objectives

The Non-Residential/Decreased Residential Alternative would meet Project objectives 1 through 4 by implementing a project consistent with the site's Campus Mixed Use General Plan designation; expanding and enhancing the City's employment base and reduce the City's current jobs/housing imbalance thereby contributing to the City's economic development goal; creating a campus neighborhood where residential units support the employment-based uses; creating a neighborhood providing residents the opportunity to walk or bike to work in the neighborhood's employment area. However, this alternative would reduce the

number of housing units from 1,041 to 524, a 50 percent reduction in the number of units, and therefore would reduce the ability to meet priority housing Project objectives 5 through 9. These include, providing a mix of housing and densities, including apartments, small lot and larger lot single family homes; creating home ownership opportunities for the missing middle; creating rental residential opportunities adjacent to employment uses; creating an employment base area that will be more attractive to employers due to the proximity of complementary residential uses; and providing a residential unit count necessary to pay the cost of extending needed infrastructure to the employment base portion of the Project and the remaining undeveloped properties in the Northeast Quadrant Specific Plan. Alternative 3 would also meet the 10th Project objective to provide stormwater management facilities that address the impacts of the Project, but also opportunities for more regional stormwater management facilities.

D. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Section 15126.6(e)(2) of the State CEQA Guidelines indicates that an analysis of alternatives to a Project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR. Alternative 1 – No Project (No Build) is identified as the environmentally superior alternative. The qualitative environmental effects of each alternative in relation to the Project are summarized in Table 5-4. Overall, the Project would be the environmentally superior alternative because it would have the least severe impacts as compared to the other alternatives.

EXHIBIT "B"
MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

Introduction

Section 15097 of the California Environmental Quality Act (CEQA) Guidelines requires public agencies to establish monitoring or reporting programs for projects approved by a public agency whenever approval involves the adoption of either a "mitigated negative declaration" or specified environmental findings related to environmental impact reports.

Table 4-1 constitutes the Mitigation Monitoring and Reporting Program (MMRP) for The Campus Project. The intent of the MMRP is to prescribe and enforce a means for properly and successfully implementing the mitigation measures identified within the Draft EIR for this Project.

Mitigation Measures

The mitigation measures are taken from The Campus Project Draft EIR and are assigned the same number as in the Draft EIR. The MMRP describes the actions that must take place to implement each mitigation measure, the timing of those actions, and the entities responsible for implementing and monitoring the actions.

MMRP Components

The components of the attached table, which contains applicable mitigation measures, are addressed briefly, below.

Impact: This column summarizes the impact stated in the Draft EIR.

Mitigation Measure: All mitigation measures that were identified in The Campus Project Draft EIR are presented, as revised in the Final EIR, and numbered accordingly.

Action(s): For every mitigation measure, one or more actions are described. The actions delineate the means by which the mitigation measures will be implemented, and, in some instances, the criteria for determining whether a measure has been successfully implemented. Where mitigation measures are particularly detailed, the action may refer back to the measure.

Implementing Party: This item identifies the entity that will undertake the required action.

Timing: Implementation of the action must occur prior to or during some part of project approval, project design or construction or on an ongoing basis. The timing for each measure is identified.

Monitoring Party: The City of Dixon is primarily responsible for ensuring that mitigation measures are successfully implemented. Within the City, a number of departments and divisions would have responsibility for monitoring some aspect of the overall project.

EXHIBIT "B"
MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

TABLE 4-1: The Campus Project Mitigation Monitoring and Reporting Program (MMRP)

IMPACT	*MITIGATION MEASURE*	*ACTION(S)*	*IMPLEMENTING PARTY*	*TIMING*	*MONITORING PARTY*
3.1 Aesthetics					
Impact 3.1-3: The Project could result in light and glare impacts.	**Mitigation Measure 3.1-3:** The Project applicant shall develop and implement a signage and lighting plan, as approved in the City's Site Plan and Design Review process, to ensure that all outdoor lighting associated with the Project is designed to minimize lighting that is misdirected, excessive, or unnecessary by requiring lighting for development to be directed downward and minimize spill-over onto adjacent properties.	Develop and implement a signage and lighting plan	Project Applicant	Prior to the issuance of a grading permit	City of Dixon Community Development Department
3.2 Agricultural Resources					
Impact 3.2-1: Implementation of the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources	**Mitigation Measure 3.2-1:** The Project proponent shall provide conservation of agricultural land within the Dixon Planning Area or within a ten-mile radius of the City at a 1:1 ratio, or pay the appropriate fee to participate in the City's master agricultural conversion program.	Identify available agricultural land for conservation and execute conservation easement, or pay the appropriate fee	Project Applicant	Prior to the issuance of a grading permit	City of Dixon Community Development Department

IMPACT	*MITIGATION MEASURE*	*ACTION(S)*	*IMPLEMENTING PARTY*	*TIMING*	*MONITORING PARTY*
Agency, to non-agricultural use.					
Impact 3.2-3 Implementation of the Project, in combination with other cumulative development, could convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use.	**Mitigation Measure 3.2-3:** Implement Mitigation Measure 3.2-1.	Identify available agricultural land for conservation and execute conservation easement, or pay the appropriate fee	Project Applicant	Prior to the issuance of a grading permit	City of Dixon Community Development Department
3.3 Air Quality					
Impact 3.3-1: Project operations would cause a violation of an air quality standard or contribute substantially to an existing or projected air quality violation.	**Mitigation Measure 3.3-1(a):** Prior to the issuance of each building permit, the Project applicant shall ensure that the Project buildings are designed to exceed the Title 24 Building Envelope Energy Efficiency Standards by 1% or greater.	Ensure buildings are designed to exceed the Title 24 Building Envelope Energy Efficiency Standards by 1% or greater	Project Applicant	Prior to the issuance of building permits	City of Dixon Community Development Department
	Mitigation Measure 3.3-1(b): During Project construction, operators of heavy-duty trucks that travel to and from the Project site are required to use trucks that have 2010 model year or newer engines that meet the CARB's 2010 engine	Operators to use trucks that have 2010 model year or newer engines that meet the CARB's 2010	Project Applicant	During grading and construction activities	City of Dixon Community Development Department

IMPACT	*MITIGATION MEASURE*	*ACTION(S)*	*IMPLEMENTING PARTY*	*TIMING*	*MONITORING PARTY*
	emission standards of 0.01 g/bhp-hr for particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions, or newer, cleaner trucks and equipment.	engine emission standards			
	Mitigation Measure 3.3-1(c): The Project applicant shall require the use of super compliant, low-VOC paints (less than 10 g/L) during the architectural coating construction phase of Project construction, and during Project maintenance.	Construction crews and maintenance operators to use super compliant, low-VOC paints.	Project Applicant	During grading and construction activities	City of Dixon Community Development Department
	Mitigation Measure 3.3-1(d): During Project construction, the Project applicant shall install Level 2 EV charging stations in 15% of all parking spaces for multi-family developments and pre-wiring to allow for a Level 2 EV charging stations in all single-family residential garages.	Install Level 2 EV charging stations as indicated. Pre-wire EV charging stations in single-family residential garages.	Project Applicant	During grading and construction activities	City of Dixon Community Development Department
Impact 3.3-2: Project construction would cause a violation of an air quality standard or contribute substantially to an existing or projected air quality violation.	**Mitigation Measure 3.3-2:** The Project applicant shall implement the following dust control measures during all construction activities. These measures shall be incorporated as part of the building and grading plans. • Water all active construction sites at least two times daily.	Implement dust control measures during all construction activities	Project applicant	During grading and construction activities	City of Dixon Community Development Department

IMPACT	*MITIGATION MEASURE*	*ACTION(S)*	*IMPLEMENTING PARTY*	*TIMING*	*MONITORING PARTY*
	Frequency should be based on the type of operation, soil, and wind exposure. • Apply water or dust palliatives on exposed earth surfaces as necessary to control dust emissions. Construction contracts shall include dust control treatment in late morning and at the end of the day, of all earth surfaces during clearing, grading, earth moving, and other site preparation activities. Non-potable water shall be used, where feasible. Existing wells shall be used for all construction purposes where feasible. Excessive watering will be avoided to minimize tracking of mud from the Project onto streets as determined by Public Works. • Grading operations on the site shall be suspended during periods of high winds (i.e. winds greater than 15 miles per hour). • Outdoor storage of fine particulate matter on construction sites shall be prohibited. • Contractors shall cover any stockpiles of soil, sand and				

IMPACT	*MITIGATION MEASURE*	*ACTION(S)*	*IMPLEMENTING PARTY*	*TIMING*	*MONITORING PARTY*
	similar materials. There shall be no storage of uncovered construction debris for more than one week. • Re-vegetation or stabilization of exposed earth surfaces shall be required in all inactive areas in the Project. • Cover all trucks hauling dirt, sand, or loose materials, or maintain at least two feet of freeboard within haul trucks. • Apply non-toxic binders (e.g., latex acrylic copolymer) to exposed areas after cut and fill operations and hydroseed area (as applicable). • Sweep streets if visible soil material is carried out from the construction site. • Treat accesses to a distance of 100 feet from the paved road with a 6-inch layer of gravel. • Reduce speed on unpaved roads to less than 5 miles per hour. •				
Impact 3.3-4: The Project would expose the public to toxic air contaminants.	**Mitigation Measure 3.3-4:** Implement Mitigation Measure 3.3-2.	Implement dust control measures during all construction activities	Project applicant	During grading and construction activities	City of Dixon Community Development Department

EXHIBIT "B"
MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

IMPACT	*MITIGATION MEASURE*	*ACTION(S)*	*IMPLEMENTING PARTY*	*TIMING*	*MONITORING PARTY*
Impact 3.3-6: Implementation of the Project, in combination with other cumulative development, would cause a violation of any air quality standard or contribute substantially to an existing or projected air quality violation.	**Mitigation Measure 3.3-6:** Implement Mitigation Measure 3.3-2.	Implement dust control measures during all construction activities	Project applicant	During grading and construction activities	City of Dixon Community Development Department
Impact 3.3-8: Implementation of the Project, in combination with other cumulative development, would expose the public to toxic air contaminants.	**Mitigation Measure 3.3-8:** Implement Mitigation Measure 3.3-2.	Implement dust control measures during all construction activities	Project applicant	During grading and construction activities	City of Dixon Community Development Department
3.4 Biological Resources					
Impact 3.4-4: Implementation of the Project, with mitigation, would not result in direct or indirect effects on special-status bird species.	**Mitigation Measure 3.4-4(a)**: A qualified biologist shall conduct surveys following the Department of Fish and Game Staff Report on Burrowing Owl Mitigation (2012) methodology (https://wildlife.ca.gov/Conservation/Survey-Protocols#377281284-birds) and prepare a report documenting the survey results. Surveys for nesting burrowing owl	Conduct preconstruction nesting bird surveys for projects initiated during the nesting season to identify avoidance measures, where needed, to ensure the protection of active nests during	Project applicant	Prior to commencement of any ground disturbing activities	City of Dixon Community Development Department Qualified Biologist

IMPACT	*MITIGATION MEASURE*	*ACTION(S)*	*IMPLEMENTING PARTY*	*TIMING*	*MONITORING PARTY*
	shall be conducted if Project construction starts during nesting season (February 1 to August 31), and surveys for wintering burrowing owl shall be conducted if the construction starts during the wintering season (September 1 to January 31). The surveys shall encompass the Project site and a sufficient buffer zone to detect owls nearby that may be impacted, which is up to 500 meters (1,640 feet), to the extent access to off-site properties is allowed, around the Project site pursuant to the above methodology. Surveys shall occur each year of Project construction, as conditions may change annually and suitable refugia for burrowing owl, such as small mammal burrows, can be created within a few hours or days, unless otherwise approved in writing by CDFW. Time lapses between surveys or Project activities shall trigger subsequent surveys including, but not limited to, a final survey within 24 hours prior to ground disturbance. The qualified biologist shall have a minimum of two years	construction activities			

IMPACT	*MITIGATION MEASURE*	*ACTION(S)*	*IMPLEMENTING PARTY*	*TIMING*	*MONITORING PARTY*
	of experience implementing the above methodology resulting in burrowing owl detections. The Project shall immediately notify CDFW if burrowing owl is detected and implement a construction avoidance buffer around any detected burrowing owl pursuant to the buffer distances outlined in the Department of Fish and Game Staff Report on Burrowing Owl Mitigation (2012), which may be up to 500 meters (1,640 feet) to the extent access to off-site properties is allowed. Any detected owl shall be monitored by the qualified biologist to ensure it is not disturbed during construction activities, unless otherwise approved in writing by CDFW. Impacts to nesting burrowing owl shall be fully avoided.-				
	Mitigation Measure 3.4-4(b): If the Project would impact an unoccupied nesting burrowing owl burrow or burrow surrogate (i.e., a burrow known to have been used in the past three years for nesting), or	Conduct preconstruction nesting bird surveys for projects initiated during the nesting season to identify	Project applicant	Prior to commencement of any ground disturbing activities	City of Dixon Community Development Department Qualified Biologist

IMPACT	*MITIGATION MEASURE*	*ACTION(S)*	*IMPLEMENTING PARTY*	*TIMING*	*MONITORING PARTY*
	an occupied burrow (where a non-nesting owl would be evicted as described below), the following habitat mitigation shall be implemented prior to Project construction. Impacts to each burrowing owl nesting site shall be mitigated by permanent preservation of two burrowing owl occupied nesting sites with appropriate foraging habitat within Solano County, unless otherwise approved by CDFW, through a conservation easement and implementing and funding a long-term management plan in perpetuity. The same requirements shall apply for impacts to non-nesting evicted owl sites except two burrowing owl occupied non-nesting (i.e., wintering) sites shall be preserved. The Project may implement alternative methods for preserving habitat with written acceptance from CDFW.	avoidance measures, where needed, to ensure the protection of active nests during construction activities Establish a species-specific buffer, if necessary Conduct environmental awareness training program for onsite personnel			
	Mitigation Measure 3.4-4(c): The applicant has contracted to acquire conservation easements to mitigate for impacts to potential Swainson's hawk foraging habitat with in-kind	Project applicant	Prior to commencement of any ground disturbing activities	City of Dixon Community Development Department Qualified	Project applicant

IMPACT	*MITIGATION MEASURE*	*ACTION(S)*	*IMPLEMENTING PARTY*	*TIMING*	*MONITORING PARTY*
	habitat at a minimum 1:1 ratio which equally benefits burrowing owl foraging as establishing a conservation easement over irrigated pasture land will provide wintering and foraging habitat for burrowing owl. The Project site contains 261.19 acres of cropland habitats which provide suitable foraging habitat for Swainson's hawks. Impacts to suitable foraging habitat for Swainson's hawk will be mitigated at a minimum 1:1 ratio (one acre of foraging habitat preserved for each acre of development). Other species known to benefit from this habitat type include: tricolored blackbird, white-tailed kite, northern harrier, yellow-billed magpie, burrowing owl, and migratory birds and raptors.			Biologist	
	Mitigation Measure 3.4-4(d): To prevent burrowing owl from sheltering or nesting in exposed material; all construction pipes, culverts, hoses or similar materials greater than two inches in diameter stored at the Project site shall be capped or covered before the end of each work day and shall be	Project applicant	During any ground disturbing activities	City of Dixon Community Development Department Qualified Biologist	Project applicant

IMPACT	*MITIGATION MEASURE*	*ACTION(S)*	*IMPLEMENTING PARTY*	*TIMING*	*MONITORING PARTY*
	inspected thoroughly for wildlife before the pipe or similar structure is buried, capped, used, or moved.				
	Mitigation Measure 3.4-4(e): The project proponent shall implement the following measures to avoid or minimize impacts on Swainson's hawk: • If construction activities will begin during the Swainson's hawk nesting season (March 20 to September 15), prior to beginning work on the Project, a qualified biologist shall conduct at least the minimum number of surveys called for within at least two survey periods prior to the initiation of construction in accordance with the Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley (Swainson's Hawk Technical Advisory Committee 2000) or the current CDFW-approved protocol and prepare a report documenting the survey results. Current survey periods	Conduct preconstruction nesting bird surveys for projects initiated during the nesting season to identify avoidance measures, where needed, to ensure the protection of active nests during construction activities	Project applicant	Prior to commencement of any ground disturbing activities	City of Dixon Community Development Department Qualified Biologist

IMPACT	*MITIGATION MEASURE*	*ACTION(S)*	*IMPLEMENTING PARTY*	*TIMING*	*MONITORING PARTY*
	specified by the Guidelines are March 20 to April 5, April 5 to April 20, April 21 to June 10, and June 10 to July 30. All potential nest trees within 0.5-mile of the Project footprint shall be visually examined for potential Swainson's hawk nests, as accessible. • If no active Swainson's hawk nests are identified on or within 0.5-mile of the Project, a letter report documenting the survey methodology and findings shall be submitted to the Project proponent and no additional mitigation measures are recommended. • If active Swainson's hawk nests (a nest becomes active once the first egg is laid and remains active until the fledged young are no longer dependent on the nest [USFWS 2018]) are found within 0.5-mile of the Project footprint, a survey report shall be submitted to CDFW, and an avoidance				

IMPACT	*MITIGATION MEASURE*	*ACTION(S)*	*IMPLEMENTING PARTY*	*TIMING*	*MONITORING PARTY*
	and minimization plan shall be developed for approval by CDFW prior to the start of construction. The avoidance plan shall identify measures to minimize impacts to the active Swainson's hawk nest depending on the location of the nest relative to the project footprint. These measures may include: o Conduct a worker awareness training program prior to the start of construction; o Establish a buffer zone and work schedule to avoid impacting the nest during critical periods. No work will occur within 200 yards of the nest while it is in active use. If work will occur within 200 yards of the nest, then construction will be monitored by a qualified biologist to ensure that no work				

IMPACT	*MITIGATION MEASURE*	*ACTION(S)*	*IMPLEMENTING PARTY*	*TIMING*	*MONITORING PARTY*
	occurs within 50 yards of the nest during incubation or within 10 days after hatching (Swainson's Hawk Technical Advisory Committee 2000); o Have a biological monitor conduct regular monitoring of the nest during construction activities; and o Should the project biologist determine that the construction activities are disturbing the nest; the biologist shall halt construction activities until the CDFW is consulted. • The Project site, including off-site improvement areas, contains 279.76 acres of suitable foraging habitat for Swainson's hawks. CDFW has provided guidelines for mitigating impacts to Swainson's hawk foraging habitat as summarized below (CDFW 1994):				

IMPACT	*MITIGATION MEASURE*	*ACTION(S)*	*IMPLEMENTING PARTY*	*TIMING*	*MONITORING PARTY*
	• Projects within 1 mile of an active nest tree shall provide: o One acre of foraging habitat for each acre of development at a ratio of 1:1. Mitigated lands shall consist of 10 percent of the land requirements met by fee title acquisition or a conservation easement allowing for the active management of the habitat, and the remaining 90 percent of the land protected by a conservation easement on agricultural lands or other suitable habitats which provide foraging habitat for Swainson's hawk (grasslands, rangeland, etc.) and no requirements for active management of the habitat; or o One-half acre of foraging habitat for each acre of development authorized at a ratio of				

IMPACT	*MITIGATION MEASURE*	*ACTION(S)*	*IMPLEMENTING PARTY*	*TIMING*	*MONITORING PARTY*
	0.5:1. All the land requirements shall be met by fee title acquisition or a conservation easement, which allows for the active management of the habitat for prey production on the land. Prey abundance and availability is determined by land and farming patterns including crop types, agricultural practices, and harvesting regimes. Actively managed land for prey production may result in the land becoming less valuable for crop production due to management limitations but increases the value for Swainson's hawk through functional lift. • Projects within 5 miles of an active nest tree but greater than 1 mile from the nest tree shall provide 0.75 acre of foraging habitat for				

IMPACT	*MITIGATION MEASURE*	*ACTION(S)*	*IMPLEMENTING PARTY*	*TIMING*	*MONITORING PARTY*
	each acre of urban development at a ratio of 0.75:1. All foraging habitat may be protected through fee title acquisition or conservation easement on agricultural lands or other suitable habitats. • Projects within 10 miles of an active nest tree but greater than 5 miles from an active nest tree shall provide 0.5 acre of Habitat Management land for each acre of urban development at a ratio of 0.5:1. All foraging habitat may be protected through fee title acquisition or a conservation easement on agricultural lands or other suitable habitat. Mitigation bank credits may also be used to satisfy Swainson's hawk mitigation requirements as approved by the City and CDFW.				
Impact 3.4-7: Implementation of the	**Mitigation Measure 3.4-7:** The Project proponent shall implement	Obtain a preliminary	Project applicant	Prior to commencement	City of Dixon Community

IMPACT	*MITIGATION MEASURE*	*ACTION(S)*	*IMPLEMENTING PARTY*	*TIMING*	*MONITORING PARTY*
Project, with mitigation, would not affect protected wetlands and jurisdictional waters.	the following measure to avoid or minimize impacts on potentially jurisdictional waters: • Before any activities that would result in discharge, fill, removal, or hydrologic interruption of any of the water features occur within the Project site, the Project proponent shall obtain a preliminary jurisdictional delineation (PJD) from the USACE. • For any impacts on jurisdictional features, the Project proponent shall obtain the appropriate CWA Section 404 and or 401 permits. All permit conditions including required avoidance, minimization, and mitigation measures included as conditions of the permit shall be followed. • Section 404 authorization from the USACE and a Section 401 Water Quality Certification from the RWQCB shall be required prior to the start of construction that would impact any waters of the U.S. Any waters of the U.S. or jurisdictional wetlands that would be lost or disturbed shall be replaced or rehabilitated on a	jurisdictional delineation from the United States Army Corps of Engineers for activities that would result in discharge, fill, removal, or hydrologic interruption of any of the water features occur within the Project site Obtain the appropriate CWA Section 404 and or 401 permits for impacts on jurisdictional waters		of any ground disturbing activities	Development Department

IMPACT	*MITIGATION MEASURE*	*ACTION(S)*	*IMPLEMENTING PARTY*	*TIMING*	*MONITORING PARTY*
	"no-net-loss" basis in accordance with the USACE mitigation guidelines and City of Dixon requirements. Habitat restoration, rehabilitation, and/or replacement shall be at a location and by methods agreeable to the agencies. If a 404 permit is required for the Project, then water quality concerns during construction shall be addressed in the Section 401 water quality certification from the Regional Water Quality Control Board. A Storm Water Pollution Prevention Plan (SWPPP) shall also be required during construction activities. SWPPPs are required in issuance of a National Pollutant Discharge Elimination System (NPDES) construction discharge permit by the U.S. Environmental Protection Agency. Implementation of Best Management Practices (BMPs) during construction is standard in most SWPPPs and water quality certifications. Examples of BMPs include stockpiling of debris away from regulated wetlands and waterways;				

IMPACT	*MITIGATION MEASURE*	*ACTION(S)*	*IMPLEMENTING PARTY*	*TIMING*	*MONITORING PARTY*
	immediate removal of debris piles from the site during the rainy season; use of silt fencing and construction fencing around regulated waterways; and use of drip pans under work vehicles and containment of fuel waste throughout the site during construction. If the ditches are determined to not be subject to federal jurisdiction, then these features may still be subject to waste discharge requirements under the Porter-Cologne Water Quality Control Act. Section 13260(a) of the Porter-Cologne Water Quality Control Act (contained in the California Water Code) requires any person discharging waste or proposing to discharge waste, other than to a community sewer system, within any region that could affect the quality of the waters of the State (all surface and subsurface waters) to file a report of waste discharge. The discharge of dredged or fill material into the ditches may constitute a discharge of waste that could affect the quality of waters of				

IMPACT	*MITIGATION MEASURE*	*ACTION(S)*	*IMPLEMENTING PARTY*	*TIMING*	*MONITORING PARTY*
	the State. A report of waste discharge shall be filed for impacts to non-federal waters, if required.				
Impact 3.4-11: Implementation of the Project, with mitigation, would not result in conflicts with an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.	**Mitigation Measure 3.4-11:** Should the Solano Multispecies Habitat Conservation Plan (Solano HCP) be adopted prior to initiation of any ground disturbing activities for any phase of development associated with the project, the Project shall be developed in accordance with the Solano HCP and the Programmatic Endangered Species Act Consultation issued by the U.S. Fish and Wildlife Service. The Solano HCP is to include avoidance and minimization measures as well as mitigation protocols for covered species and sensitive habitats. The City of Dixon is a voluntary participant in the Solano HCP. The Project applicant, the City of Dixon, and a representative from the Solano HCP shall ensure that all mitigation/conservation requirements of the Solano HCP are adhered to prior to and during construction. To the extent there is duplication in mitigation for a given species, the requirements of the Solano HCP shall supersede. If this	Develop project in accordance with the Solano HCP and Programmatic Endangered Species Act Consultation issued by the U.S. Fish and Wildlife Service	Project applicant	Prior to commencement of any ground disturbing activities	City of Dixon Community Development Department Representative of the Solano Multispecies Habitat Conservation Plan

IMPACT	*MITIGATION MEASURE*	*ACTION(S)*	*IMPLEMENTING PARTY*	*TIMING*	*MONITORING PARTY*
	measure is implemented after adoption of the Solano HCP, the project proponent shall comply with all requirements of the Solano HCP.				
Impact 3.4-12: The Project, in combination with other cumulative development, could result in the loss of biological resources including habitats and special status species.	**Mitigation Measure 3.4-12:** Implement Mitigation Measures 3.4-4(a) through 3.4-4(c), and 3.4-7 and 3.4-11.	Implement mitigation measures	Project applicant	Prior to commencement of any ground disturbing activities	City of Dixon Community Development Department
3.5 Cultural Resources and Tribal Cultural Resources					
Impact 3.5-1: The Project would not, with mitigation, cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5.	**Mitigation Measure 3.5-1(a):** The Project proponent shall develop and implement an Archaeological Monitoring Program, whereby the Project proponents shall retain the services of an experienced archaeologist who will be present on-site to observe ground-disturbing activities requiring grubbing, grading, trenching, or excavation within defined Project areas. The Archaeological Monitor will be given access to inspect all ground surface and subsurface modifications, excavations, installations, equipment parking, and any other construction-related activities in the vicinity of the	Develop and implement an Archaeological Monitoring Program Follow guidance identified in the Archaeological Monitoring Program, as necessary	Project applicant	During grading and construction activities	City of Dixon Community Development Department Qualified archaeologist

IMPACT	*MITIGATION MEASURE*	*ACTION(S)*	*IMPLEMENTING PARTY*	*TIMING*	*MONITORING PARTY*
	defined Project areas. These defined Project areas consist of the two (now filled-in) historic drainage areas, located in the northern and southern portions of the APE, and the graveled-over area, located within the central-western portion of the APE. The archaeological monitoring will consist of on-the-ground and close observation by an experienced archaeologist for any kind of archaeological or cultural remains that might be exposed during ground-disturbing construction activities. Construction activities will be monitored by following the construction equipment as it removes or modifies soils and vegetation, and may involve walking cuts or excavations after the machinery has passed, or standing to the side and observing the soil removal activity. The archaeologist on-site will be given "stop work authority" so that in the event that they observe a change in soil conditions and/or artifacts or structural remains, they shall bring all construction activities within a 164 ft radius of the area to a stop so that they may further assess the find. Further ground disturbances in				

IMPACT	*MITIGATION MEASURE*	*ACTION(S)*	*IMPLEMENTING PARTY*	*TIMING*	*MONITORING PARTY*
	the vicinity of the find will remain stopped while an assessment is underway and until the archaeologist on-site can provide recommendations for treatment of the discovery. If a potentially significant find cannot be avoided by the project, the retained archaeologist, who meets the Secretary of the Interior's Professional Qualifications Standards, will develop an evaluation plan in consultation with the City that contains a research design to guide assessments of the resource's significance and scientific potential.				
	Mitigation Measure 3.5-1(b): The Project proponent shall develop and implement a Worker Awareness Training Program, where all construction personnel involved in ground-disturbing activities shall be trained in the recognition of possible cultural resources and the protection of such resources. The training program will inform all construction personnel of the procedures to be followed upon the discovery of archaeological materials, including Native American artifacts. Construction personnel will be instructed that	Conduct worker-awareness training program for onsite operators of ground disturbing equipment	Project applicant	Prior to commencement of any ground disturbing activities	City of Dixon Community Development Department

IMPACT	*MITIGATION MEASURE*	*ACTION(S)*	*IMPLEMENTING PARTY*	*TIMING*	*MONITORING PARTY*
	cultural resources must be avoided and that all travel and construction activity must be confined to designated roads and areas. The training will include a review of the local, state, and federal laws and regulations related to cultural resources, as well as instructions on the procedures to be implemented should unanticipated resources be encountered during construction, including stopping work in the vicinity of the find and contacting the appropriate environmental compliance specialist.				
Impact 3.5-2: The Project would not, with mitigation, cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5.	**Mitigation Measures 3.5-2:** Implement Mitigation Measures 3.5-1(a) and 3.5-1(b)	Implement mitigation measures	Project applicant	Prior to commencement of any ground disturbing activities	City of Dixon Community Development Department
Impact 3.5-3: The Project would not disturb any human remains, including those interred outside of dedicated cemeteries.	**Mitigation Measure 3.5-3:** If an inadvertent discovery of human remains is made at any time during project-related construction activities or project planning, the following performance standards shall be met before implementing or continuing actions such as	If unanticipated discoveries are identified, halt construction activities, identify the resource(s), and coordinate with a	Project applicant	If any human remains are found during grading and construction activities	City of Dixon Community Development Department Solano County Coroner

IMPACT	*MITIGATION MEASURE*	*ACTION(S)*	*IMPLEMENTING PARTY*	*TIMING*	*MONITORING PARTY*
	construction that may result in damage to or destruction of human remains. In accordance with the California Health and Safety Code (HSC), if human remains are encountered during ground-disturbing activities, the City shall immediately halt potentially damaging excavation in the area of the remains and notify the Solano County Coroner and a qualified archaeologist (meeting the Secretary of the Interior's Professional Qualifications Standards for Archeology) to determine the nature of the remains. The coroner is required to examine all discoveries of human remains within 48 hours of receiving notice of a discovery on private or state lands (HSC Section 7050.5[b]). If the human remains are of historic age and are determined by the Solano County Coroner to be not of Native American origin, the City will follow the provisions of HSC Section 7000 et seq. regarding the disinterment and removal of non–Native American human remains. If the coroner determines that the remains are those of a Native American, he or she must contact the Native American Heritage	professional archaeologist, Native American Tribal representative, and/or County Coroner, as appropriate			Native American Heritage Commission

IMPACT	*MITIGATION MEASURE*	*ACTION(S)*	*IMPLEMENTING PARTY*	*TIMING*	*MONITORING PARTY*
	Commission (NAHC) by phone within 24 hours of making that determination (HSC Section 7050[c]). After the coroner's findings have been made, the archaeologist and the NAHC-designated Most Likely Descendant, in consultation with the landowner, shall determine the ultimate treatment and disposition of the remains. The responsibilities of the City for acting upon notification of a discovery of Native American human remains are identified in Public Resources Code Section 5097.9 *et seq*.				
Impact 3.5-4: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a	**Mitigation Measure 3.5-4(a):** Implement Mitigation Measures 3.5-1(a), 3.5-1(b), 3.5-2, and 3.5-3.	Implement mitigation measures	Project applicant	Prior to commencement of any ground disturbing activities	City of Dixon Community Development Department
	Mitigation Measure 3.5-4(b): A tribal cultural resources awareness brochure and training program for all personnel involved in the project's ground disturbing activities (site grading, utility infrastructure installation, construction, etc.) shall be developed in coordination with interested Native American Tribes. The brochure shall be distributed	Prepare a tribal cultural resources awareness brochure and training program Distribute information to personnel associated with ground disturbing activities	Project applicant	Prior to commencement of any ground disturbing activities	City of Dixon Community Development Department Native American Representatives from Culturally Affiliated Tribes

IMPACT	*MITIGATION MEASURE*	*ACTION(S)*	*IMPLEMENTING PARTY*	*TIMING*	*MONITORING PARTY*
California Native American tribe, and that is: • Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)? • A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead	and the training will be conducted by Native American representatives, or tribal monitors from culturally affiliated Native American Tribes, before any stages of project implementation and construction activities begin on the Project site. The training may be done in coordination with the project archaeologist. The program will include relevant information regarding sensitive tribal cultural resources, applicable regulations and protocols for avoidance, and consequences of violating state laws and regulations. The program will describe appropriate avoidance and minimization measures for resources that have the potential to be located on the Project site and will outline what to do and whom to contact if any potential tribal cultural resources or archaeological resources are encountered. The program will underscore the requirement for confidentiality and culturally appropriate treatment of any find with cultural significance to Native Americans' tribal values. All operators of ground-disturbing equipment shall receive the training and sign a form that acknowledges receipt of the training.				

IMPACT	*MITIGATION MEASURE*	*ACTION(S)*	*IMPLEMENTING PARTY*	*TIMING*	*MONITORING PARTY*
agency shall consider the significance of the resource to a California Native American tribe. •					
Impact 3.5-5: Implementation of the Project, in combination with other cumulative development, could contribute to the cumulative loss or alteration of historic-era and indigenous archaeological resources and/or human remains in archaeological contexts.	**Mitigation Measure 3.5-5:** Implement Mitigation Measures 3.5-1(a), 3.5-1(b), 3.5-2, and 3.5-3.	Implement mitigation measures	Project applicant	Prior to commencement of any ground disturbing activities	City of Dixon Community Development Department
3.7 Geology, Soils, and Seismicity					
Impact 3.7-5: Implementation of the proposed Project, with mitigation, would not or indirectly destroy a unique paleontological resource or site or unique geologic feature.	**Mitigation Measure 3.7-5:** If fossils or fossil-bearing deposits are encountered during ground-disturbing activities, work within a 25-foot radius of the find shall halt, the Dixon Community Development Department shall be notified, and a professional vertebrate paleontologist (as	If paleontological resources are identified, halt construction activities, identify the resource(s), and notify the City	Project applicant	If any fossils are found during grading and construction activities	City of Dixon Community Development Department Qualified Vertebrate Paleontologist

IMPACT	*MITIGATION MEASURE*	*ACTION(S)*	*IMPLEMENTING PARTY*	*TIMING*	*MONITORING PARTY*
	defined by the Society for Vertebrate Paleontology) shall be contacted immediately to evaluate the find. The paleontologist shall have the authority to stop or divert construction, as necessary. Documentation and treatment of the discovery shall occur in accordance with Society of Vertebrate Paleontology standards. The significance of the find shall be evaluated pursuant to the CEQA Guidelines. If the discovery proves to be significant, before construction activities resume at the location of the find, additional work such as data recovery excavation may be warranted, as deemed necessary by the paleontologist.	A qualified paleontologist shall prepare a recovery plan, and recommendations in the recovery plan shall be implemented by the applicant before construction activities resume in the area where the paleontological resources were discovered			
Impact 3.7-10: Implementation of the Project, in combination with other cumulative development, would not or indirectly destroy a unique paleontological resource or site or unique geologic feature.	**Mitigation Measure 3.7-10:** Implement Mitigation Measure 3.7-5.	Implement mitigation measure	Project applicant	If any fossils are found during grading and construction activities	City of Dixon Community Development Department Qualified Vertebrate Paleontologist
3.10 Land Use					

IMPACT	*MITIGATION MEASURE*	*ACTION(S)*	*IMPLEMENTING PARTY*	*TIMING*	*MONITORING PARTY*
Impact 3.11-3: The Project would not conflict with an applicable habitat conservation plan or natural community conservation plan.	**Mitigation Measure 3.11-3:** Implement Mitigation Measure 3.4-11.	Implement mitigation measure	Project applicant	Prior to commencement of any ground disturbing activities	City of Dixon Community Development Department Representative of the Solano Multispecies Habitat Conservation Plan
3.15 Transportation					
Impact 3.15-2: Implementation of the Project would be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) regarding Vehicle Miles Traveled (VMT).	**Mitigation Measure 3.15-2:** The effectiveness of various VMT mitigation strategies as documented in the literature is summarized in the California Air Pollution Control Officers Association (CAPCOA) Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Change Vulnerabilities, and Advancing Health Equity (CAPCOA Handbook). Table 3.15-6 [of this Draft EIR] summarizes the maximum potential effectiveness of various applicable strategies documented in the CAPCOA Handbook that were considered for potential incorporation into the project. Although implementation of any feasible VMT-reducing measures would not provide the level of	Identify and implement vehicle miles traveled (VMT) mitigation measures	Project applicant	Prior to the approval of improvement plans	City of Dixon Community Development Department

IMPACT	*MITIGATION MEASURE*	*ACTION(S)*	*IMPLEMENTING PARTY*	*TIMING*	*MONITORING PARTY*
	mitigation necessary to significantly reduce VMT-related Project impacts, the following measures shall be implemented to lessen impacts to the extent possible: All future employers at the Project site shall: • Implement a voluntary employee trip reduction program; • Identify a carpool coordinator; • Include preferential carpool parking spot(s) at employee generating development to be reserved for use by employees who carpool (2+ employees per car per ride); • Provide incentives as feasible for employees who walk, ride manual bicycles, and/or take public transportation to work more than half of the time and can provide proof; • Ensure the availability of a secure bicycle storage area within the Dixon Opportunity Center for use by employees; and • Allow remote work for applicable employees where feasible for one or more days per week or equivalent hours.				

EXHIBIT "B"
MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

IMPACT	*MITIGATION MEASURE*	*ACTION(S)*	*IMPLEMENTING PARTY*	*TIMING*	*MONITORING PARTY*
Impact 3.15-5: Implementation of the Project, in combination with other cumulative development, would be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) regarding Vehicle Miles Traveled (VMT).	**Mitigation Measure 3.15-5:** Implement Mitigation Measure 3.15-2.	Implement mitigation measure	Project applicant	Prior to the approval of improvement plans	City of Dixon Community Development Department

EXHIBIT "C"
Draft and Final EIR

THE FINAL AND DRAFT ENVIRONMENTAL IMPACT REPORT (STATE CLEARINGHOUSE #2023080739) FOR THE CAMPUIS PROJECT

The Final EIR and Draft EIR (SCH No. 2023080739) for The Campus project are incorporated by reference to this Resolution and shall be kept at Dixon City Hall, 600 East A Street, Dixon, CA 95620

Public review copies of the Final EIR and Draft EIR were also made available during the Planning Commission and City Council public hearing process at the City's web page for the Dixon project subject to environmental review, under the heading of The Campus/Dixon 257, available at https://www.cityofdixonca.gov/environmentalreviewdocuments.