

**RESPONSES TO
COMMENTS**

allow the various agencies to comment on it. A major obstacle of the landowners was the fear that if there was a Swainson Hawk on the property, the property would not be salable. Mr. Taormino said the most important lesson from the whole process was to start early to put a conservation easement on land.

E-2-6

Rich Jenness, Woodland resident, and engineer, 608 Court Street, Woodland, made some technical comments about the General Plan and specifically about surface and ground water. He said the General Plan addresses the need to investigate the possibility of surface water supplies for domestic and/or agricultural use in the area. His concerns related to the belief that a surface water supply could be economically introduced to the Woodland area. The City is now entirely on a ground water system, and in his estimation should remain so. Investigation of surface water use should be for the benefit of agricultural water users for the following reasons: (1) it is better quality water for crops in that boron and other salts are in lesser concentrations and less injurious to crops; (2) it is usually less expensive water than ground water pumping because it need not be treated for agricultural purposes; and (3) it will reduce the dependency on ground water supplies for the City or for any urban use. He said the City should remain on ground water supply for the safeguards inherent in that type of system and because it is the system in use today. If the City were to consider using surface water in lieu of ground water, the cost would be far greater for water to customers. He said for Alternative 2 of the General Plan which consists of approximately 1,500 acres the cost of water treatment plant, pumping, conveyance facilities, water storage, water distribution system will be approximately \$20,000,000. The same area using a ground water system will cost about \$5,000,000. Additionally operation and maintenance costs are far more expensive for a treatment plant and related facilities than a ground water system. If one were to consider changing the water system to a surface water system, consider the cost and interruptions to the existing underground facilities and consider the problems getting the voters to vote on financing such a system. He said he is not making a case against surface water development. He said in fact this County needs additional surface water. He stressed the need to work with agricultural water interests in developing additional surface supplies for ag purposes allowing municipal and domestic needs to be served by the present ground water system.

Vice Mayor Rominger said she agrees with Mr. Jenness' cost analysis. She thought the City could possibly do some exchanges and/or some diversion at a different point. She asked Mr. Jenness if that was a viable alternative.

Mr. Jenness said that is a viable alternative, and that is why he suggested the City at least assist the ag water interests in that endeavor. Getting the surrounding area of the community off ground water supply for ag water pumping enhances the ability of

the City to grow using the ground water system. Then farmers are better able to use the untreated surface water supplies.

Vice Mayor Rominger said the City Council and City Public Works Department has received a letter from Yolo County Flood Control and Water Conservation District to look at studying extension of the Magnolia Canal and working jointly to use some of that water to distribute it along the northern and western sides of the City to help with percolation and help distribute the water.

E-2-7 Felix Ybarra, 113 North College Street, Woodland, said he was a resident on a street which is very close to property within Alternative 1 and was aware of what was proposed two to three years ago for the area. As a small builder in the community he said it makes sense to continue the infrastructure to maintain the core look. He said one alternative maintains the core look and the other goes off into the sunset to the east. He said the infrastructure is already there making Alternative 1 much less costly and conceivably open to phasing. The timing would also be beneficial in terms of making Alternative 1 happen.

E-2-8 Paul Deering, Vice President of Yolo Land Conservation Trust, said he was available to answer questions about conservation easements. He said they are talking about a permanent form of zoning, something that political bodies have a hard time accomplishing. He said easements can be used to lock in the City's conservation decisions. He said Yolo Land Conservation Trust holds the two easements mentioned by Mr. Taormino on the Willow Slough By-Pass north of Davis. He said Trust also holds an easement in Clarksburg for 60 acres which is a reinforcement to their Urban Limit Line and allowed development of six home sites. He said both of these easement locations were generated from development mitigation requirements for different purposes.

E-2-9 Blanca Garcia, 385 Bright Day Court, Woodland, said she supports Alternative 1. She said she served on the City Parks and Recreation Commission for two and one-half years and saw a lot of need for facilities for youth, such as soccer and baseball fields. She said it makes no sense to place these facilities farther away from current residents. She said she is in the real estate business and is concerned about the need for and safety of bike paths. She said the City needs to look at growth rate over a longer period than one year at a time, and the City needs upscaled, executive housing.

E-2-10 Bill Glazier thanked the City staff, Council and Commission for all of the work on the development of the General Plan. He said he supports Alternative 1 for continuity.

E-2-11 Suzanne Falzone, 1723 Cottonwood Street, Woodland, asked the Council/Commission to consider the quantity of tax revenue with increased development as well as the quality of life for future residents. She asked them to consider very carefully a cost

E-2-11
(cont)

effective use of shared land and shared facilities in one of the alternatives. She said the City has the opportunity to maximize the use of shared facilities with other agencies whether they include soccer fields, ball fields, libraries, technology infrastructure, or child care. She said they have the capability to be clustered together in a very shared and effective way and made available to the residents of this future community.

E-2-12

Ed Borchard said he supports Alternative 2. With Alternative 1 there is a traffic problem; the City will have to assume all of the new traffic which will be diverted back up West Street, Cottonwood Street and College Street. He said Alternative 2 is the lesser of two evils in terms of taking out prime farm ground. He said he would like an ag study being done of the remaining area.

E-2-13

Eric Paulsen said he prefers Alternative 3 which is not being proposed; he said he wished there were stronger consideration being given for the land east of County Road 102. He said there are some inherent problems there and wishes it could be studied further to know whether or not these problems could be solved for the future. He said he felt there is potential for doing business with PG & E for water rights reasons.

E-2-14

Bev McWhirk, 624 Wildwood Way, Woodland, said she agreed with the comments of Suzanne Falzone with respect to share facilities. She said she supports Alternative 2 because it requires a large tract of land to make those things happen. She said the City needs to have the right sized block of land. Additionally, she said consideration needs to be given to Alternative 2 because County Road 25A is the southern boundary, and ultimately 20 years from now consideration should be given to a beltway around Woodland. When working on the Downtown Specific Plan there was much discussion of how to get the traffic off Main Street and make the Downtown pedestrian friendly. She said she would like to preserve the small town quality of Woodland, and one issue to plan for is traffic.

E-2-15

Andy Efstratis discussed the density issue. He said whether the growth goes south or southeast there should be consideration of the 65/35 or 85/15 ratio of multifamily residential and single family residential housing. The City needs to consider that. When the City zones property for multifamily, the City creates an infrastructure situation where the City has to plan for it and build it and create a surcharge on single family residential. If the City plans for a very large multifamily area, the City is adding onto the cost of homes. He said rents for single family residential are actually moving down.

E-2-16

Don Reed, former President of Larchmont Homes, said he has been in the housing industry for over 20 years, primarily single family housing. He said the Plan the City is addressing is important because it sets the expectations from the community and also is required by law to achieve certain housing types. A concern addressed is that when the Plan is being developed which

calls for a high percentage of multifamily versus single family the City has to deal with the infrastructure that becomes a charge not only for housing but a charge for other kinds of development that will occur for the Plan area.

E-2-17 Dr. Jim North said Woodland has a small town feeling and is family oriented. He said he has read the General Plan documents, and they are very good. He said he took an informal poll of residents which resulted in support for a no growth policy. He said he supported Alternative 2. He said coming from Iowa and experiencing flooding he did not feel it would be wise to build in the Conaway Ranch area.

E-2-18 Mike Beeman said he is affected by both Alternatives. If the Council does adopt Alternative 1, it becomes natural that Road 25 may become a southern boundary. If that occurs he wanted to go on record that it should go on land that is presently annexed and not be bestowed on land owners to the south. He said Dorothy Scott, another land owner, is also opposed to this becoming a major thoroughfare. Secondly, he said he farms on land throughout the Conaway area, and if the City takes Conaway's surface water and uses the wells that they drill, this affects his property. The wells are going to remain higher around Woodland.

E-2-19 Chuck Townsend, Woodland resident, said he supports Alternative 1. He said when the Planning Commission first discussed the alternatives, they decided to do away with phasing, but he said when he looks at Alternative 2 he sees Alternative 4. He said when the Planning Commission brought forth the idea of Alternative 1, the attempt was to broaden the aspects of the land and to provide a competition for projects so that projects could be brought to the Planning Commission and the City Council to benefit the community. He said he supports Alternative 1 because it addresses the problem of traffic on Gibson Road.

E-2-20 Tom Stoffregen, Chair of the Parks and Recreation Commission, said the Commission at its meeting last night discussed the small allocations for park land which are not sufficient for the needs of our citizens. The growth is limited in a box in this manner. Development is forced to become the vision for quality of life and quality of parks. He said the Commission hoped that land would be available in acreage in predevelopment phases so that all of the City funds are not spent on post development land requiring the City to spend \$100,000+ per acre. He said the Commission is not supporting a particular alternative but supports the acquisition of additional park land and school land.

E-2-21 Pat Monley, 650 Elm Street, Woodland, said he is a small builder in the County. He said he has built about 30 homes in the County and one has been built in Woodland. He said it is much easier to sell homes in Davis; Davis has outstanding schools, diversity in housing, and excellent recreational facilities. He said he prefers living in Woodland because of the heritage, and he

said he supports Alternative 1 because it shows continuity.

E-2-22 [Kathy Trott said she was speaking on behalf of her husband Ken Trott as well, and they support Alternative 2. She read a letter on their position. She said they supported preserving prime ag land and continuing enhancement of the Downtown. They supported policies favoring infill development over outward growth and higher residential and commercial densities.

E-2-23 [Julie Farnham said she supports Alternative 2 and quality of life in Woodland.

E-2-24 [Dudley Holman said he is glad that his comments regarding water have started dialogue regarding the issue. He said it is a false assumption that our ground water will always be here and that it will always be sufficient. He encouraged the investigation of alternatives.

Mayor Sandy said the City has received letters from some bona fide water experts who point out that Woodland's water is in fine shape, and that Woodland's best hope is to look to Cache Creek and not to the east for its water supply. Some of those experts have asked to appear before the Council in the coming month to set the record straight.

E-2-25 [Rodney Hersom II, resident on College Street, spoke about his "stump theory." He said just as stumps have new growth around even though the center is dead, the City needs to keep the heart of the City from dying. He also encouraged residents to shop in Woodland rather than going elsewhere.

E-2-26 [Deborah Kunesh thanked the Council and Commission for its time devoted to the General Plan. She said there are four key principles to the General Plan: (1) orderly development to achieve an orderly pattern of community development consistent with economic social and environmental needs; (2) economic health for a diverse economic base with a range of employment opportunities for all residents; (3) adequate housing with a variety of sizes and types; and (4) continuance of intergovernmental coordination. She encouraged the Council and Commission to continue with its time line for the General Plan.

There were no further public comments offered.

Council Member Slaven addressed the issue of the fiscal analysis regarding Table IV capital costs. He said there is a problem of getting adequate sports fields in our community. He said the estimated land cost per acre is \$100,000. Estimated development costs are \$115,000 per acre. The new neighborhood parks and sports fields are estimated at 243.2 acres which equates to land costs alone of \$24,000,000. He said the City needs to develop an adequate fund for acquiring the land.

Council Member Flory said we need to develop some way of getting the land at a less costly tab, but with new development we always have to remember that whatever we do with parks and amenities the homeowners are going to pick up the tab and some of the commercial. The landowners inevitably pass on the price of the home to the homeowner. He said he favored the idea of offering some of the Community Park land now with someone who is interested in developing for some land the City can get even closer to the City that is less expensive. The City can utilize that land immediately because with the problems at the Community Park it will take millions of dollars to develop there. The City could start stockpiling some land now and come up with a method of developers paying in advance so the City can buy land somewhere else in the City now instead of five or six years from now when the land is more expensive.

Vice Mayor Rominger said the City currently has property which has been designated for ball fields, etc., and the City has not developed them. She said the point is the City can put this in the Plan and make plans to develop the facilities, but she asked if we are actually going to do it. She said the Council has been talking about the Regional Park for six years, and the Council has not done anything with it even though the City has had offers from various groups to help out in the development of the facilities. Storz Pond is there, and the response she received from Parks, Recreation and Community Services Director Tim Barry regarding the timing of the development is the concern about the drainage and the maintenance of the facility. She said the drainage problem could be solved by just filling it up with some soil, but the construction and maintenance would have to be addressed.

The Community Development Director said the issue of funding for long term facilities as defined in the General Plan when you get into issues of land costs and development costs these are issues that are raised with the development fee study and are based on the issues of development fee payment which is done at the time of new development. If you are talking about prepayment of fees for future development, you are going to need to have the City Attorney look at how the City can do that. She said the City of Sacramento just did something with the commercial and industrial developers to pay for infrastructure, and they formed a district and issued bonds to go in and prepay for the improvements to avoid payment of development fees only at time of construction and pay over a longer period of time. She said the Council would have to look at alternative funding methods to do that because the current funding method is setup based on development fees being paid at the time of building permit issuance. That money is collected, and then we negotiate for the acquisition of the land. She said we pay that price, and that land is paid for by all of the new development in that area. If the City were to look at land banking, the City would have to find a source of funding for that and then use development fees to pay those costs to keep development fees lower because the land costs would be lower. She said we still need to

address maintenance. The City of Davis has a landscaping and lighting district throughout their City, and she said Davis pays for their park maintenance through the district. In the new areas of the City of Woodland fees are required to pay for park maintenance.

Council Member Slaven said a stronger statement needs to be included in the Plan regarding park facilities.

Vice Mayor Rominger said she has some extensive comments regarding the General Plan Policy document, and she will type the comments and give them to the Council and Planning Commission.

Mayor Sandy said Judy Cahill of McDonough, Holland & Allen was present at the meeting. He said the City retained her because of Conaway Conservancy; the City had to hire a separate legal counsel to represent the City.

The Community Development Director addressed the multifamily issue. She said the Council asked staff to research what other cities have done for multifamily requirements. She said Sacramento Area Council of Governments surveyed three cities with respect to multifamily requirements and low and very low income units: Vacaville, Roseville, and Yuba City. She said none of these cities have a multifamily requirement, but Davis, Winters and Woodland do. Davis is 40 percent; Winters is 25 percent; and Woodland is at 35 percent. In terms of very low and low income allocations the City of Woodland has the very lowest percentage for very low and low income. When the City received its allocation, the City protested and it was determined that 40 percent of the new units to be built should be in the very low to low income category. She also gave the Council information about the last ten years of low income residential construction. She noted that \$18,500 annual income is considered very low income for a family of four people; low income is \$19,000 to \$30,000; moderate income is \$30,000 to \$40,000; and above moderate is \$40,000. She said there has been discussion about amending the Housing Element, and staff did not propose that. She said any amendment to the Housing Element requires the City to go back to HCD to review the element, and it takes approximately 45 days for the review. She said staff cannot guarantee HCD will certify the Housing Element if the City removes the multifamily housing requirement. State law requires that HCD once the City submits an amendment to the Housing Element needs 45 days to review the element, and HCD has 90 days if a new Housing Element is sent in for readoption.

Mayor Sandy said if the Commission and Council decided they wanted to change the housing percentages, they could possibly put a finding in the General Plan which stipulates that. For example, he said they could set a goal in the Plan.

The Community Development Director said her initial reaction to that suggestion is whether the City would have internal

consistency between the Housing Element of the Policy which talks about 65/35 and a General Plan Policy which is somewhere in the land use element which says something else.

Assistant City Attorney Ann Siprelle said one concern she has is to make that type of change in this General Plan update the Council would first have to consider that in the environmental document, and it would be a change to the Housing Element. There is a legal requirement that the General Plan be consistent internally. The appropriate changes would have to be made in the Circulation Element and the Land Use Element and consider all in one EIR. She said this could be done but it would take a significantly longer time.

The Community Development Director said as the City embarks upon the next specific plan the City can look again at the housing diversity issue as a part of that plan. She said the Council/Commission may find as in the Southeast Area that the allocation was 72/28 percent because of the way the land was planned. She said amendments could be made to the Housing Element at that time.

Planning Commissioner Tony Fernandez suggested that the Planning Commission could hold a mini housing summit or workshop and take a snapshot picture of what is happening in the Southeast Area. Developers could be invited to participate to get a better feel of what is happening, and then the Planning Commission could come back to the Council with a recommendation. He said he prefers keeping this General Plan process on track and not deviating from where we are going. He said the Commission/Council could settle the issue after it finishes the General Plan.

Mayor Sandy said he agrees with Commissioner Fernandez, and the Council would need a recommendation from the Planning Commission. Council Member Slaven said he agreed.

Mayor Sandy said the Community Development Director prepared some tables giving history on growth rates. In the 1970's there was a healthy growth rate of 3.7 percent, and in the 80's there was a growth rate of 2.8 percent. So far for the 90's the rate has been 1.9 percent. He asked if the Council/Commission was interested in a mechanism for dealing with an increased growth rate. He said he felt strongly that there should be.

Commissioners Hicks and Moore also agreed there should be a mechanism.

Council Member Flory said they need to discuss the ultimate goals and agreed if there are some controls that could be placed the community will benefit.

Commissioner Fernandez said he was leery of setting growth caps and felt the market forces play a role.

Vice Mayor Rominger said she has been advocating all along that 2 percent is too high for a growth rate and 64,000 is too many people. She said she does not see a need to grow any faster than the Statewide average which is 1.7 percent. She said 1.5 percent is more in line with something she could support. She said it makes a difference how much acreage is required.

Commissioner Sieberth said he could also support a 1.5 percent growth rate. Commissioner Agostini said she too would support a more conservative growth rate. Commissioner Hicks said quality growth and being flexible are more important than getting hung up on the numbers. Commissioner Schwartz said he felt we need to build in some form of a cap to protect ourselves; he said we could easily get caught up in a major shift in population and have it turn around, go the other way and be left holding the bag.

Mayor Sandy said the degree to which the City limits or manages the population has a dramatic impact on the City's ability to finance some of the improvements discussed earlier. His concern is that the City should not constrain population and constrain land use to such an extent that developers are severely restricted because there is insufficient land and insufficient numbers to do anything else. He said we should set a reasonable population and at some point economics has to play a role.

Commissioner Friedlander said he supports a population less than 60,000, somewhere around 58,000, but he said the Council/Commission has to put some energy into how it would implement the General Plan policy.

Assistant City Attorney said if the Council agreed to slow down the growth, you would think the adverse impacts would also slow down, the revenue the City gets from development fees, etc. If the Council decides to do this, the consultants would need to go back and look at what the impacts would be in each area and see if the EIR was still sufficient. If the EIR needs to be changed significantly, it will have to be recirculated.

The Community Development Director said staff would ask the consultant to determine if a new fiscal analysis would have to be prepared. She said much depends on what the Council tells staff. She said if the Council wants the growth rate to go from 2 percent to 1 percent, that may be viewed as significant.

Mayor Sandy said the Council/Commission can ask the question and wait for the answer.

The Community Development Director said a lot depends on what the Council/Commission is looking at. She said the Council/Commission has discussed looking a reduction of land area, reduction in growth, and issues of putting into place growth management tools but keeping the same population. Some just want

to lower the rate, and some want to lower the rate but keep the same amount of land area in the Plan because they want the flexibility. She said the third thing she heard is not touching the figure but looking at how we can put in place some method to manage the growth so that it becomes an ultimate cap that we do not bypass. She said those are all things that would affect the EIR very differently.

Mayor Sandy said staff could ask the fiscal consultant and the EIR consultant what lowering the population might be. He said maybe they could look at 58,000 and 60,000 and bring the answer back at the next meeting.

Mayor Sandy said the final issue is that a number of letters were received regarding water.

The Community Development Director said staff will put together a packet of the letters. She said some are not significant from a policy standpoint, but she will ask for direction from Council/Commission at the November 28 joint meeting.

Mayor Sandy said requests to speak to the Council were received from Erik Vink of the American Farmland Trust which recently completed a fairly widespread study of consumption of farmland in California and from Jim Eagan, Yolo County Flood Control and Water Conservation District, regarding water issues. He said those presentations could be made on November 28.

The Community Development Director said we have not had the water consultant, storm drainage consultant or sewage consultant, and she said they could be present at the November 28 meeting. Mayor Sandy suggested also that the fiscal consultant be present at the meeting.

ADJOURNMENT:

At 9:48 p.m. the meeting was adjourned.

City Clerk of the City of Woodland

November 28, 1995

The Woodland City Council and the Woodland City Planning Commission met in adjourned session at 7:03 p.m. in the City Hall Council Chambers.

PLEDGE OF ALLEGIANCE:

Mayor Sandy opened the meeting and invited everyone present to join him in the pledge of allegiance to the Flag of the United States of America.

ROLL CALL:

COUNCIL MEMBERS PRESENT: Sandy, Borchard, Flory, Rominger

COUNCIL MEMBERS ABSENT: Slaven

PLANNING COMMISSION
MEMBERS PRESENT: Agostini, Moore, Friedlander,
Sieberth, Hicks, Fernandez,
Schwartz

STAFF PRESENT: Ruggiero, Hanson, Nies, McDuffee, Horgan,
Zeier, Wegener, Siprelle, Winnop

PUBLIC COMMENT:

There were no public comments.

PUBLIC HEARING - GENERAL PLAN:

Mayor Sandy said the City Council and the City Planning Commission is meeting again jointly to continue a public hearing to receive public input on the General Plan Policy Plan, the Background Report, the Draft Environmental Impact Report and the Fiscal and Financial Analysis. He said presentations were scheduled at the beginning with Erik Vink of American Farmland Trust and Jim Eagan of Yolo County Flood Control and Water Conservation District. He said Mr. Vink has not yet arrived, and Mr. Eagan was called away to another meeting. Mr. Fran Borcalli will take Mr. Eagan's place to give the Council and Commission an assessment of local water supplies.

Fran Borcalli said it is important to understand that water planning takes time and getting a project on line is even more difficult. From the Yolo County Flood Control and Water Conservation District standpoint he described the water supply which is the Cache Creek watershed. He said the District has the water rights to Clear Lake and owns and operates Indian Valley Dam and Reservoir on the North Fork. These two reservoirs in conjunction with the tributary flow down stream constitute the water supply for the District. The District has an extensive

distribution system throughout a large part of Yolo County. He said that surface water distribution system is really significant in terms of reducing ground water pumpage for agriculture, and at the same there is a recharge component to it. He said the Cache Creek watershed is a deliberate system. In 1969 the water rights to Clear Lake were acquired by the District. He said had the District not acquired those rights the City's prices for water would be substantially different, and the City's water balance would be different. In 1975 the Indian Valley Dam and Reservoir was completed; it took two elections for that to be approved. In 1972 prior to its completion there was a drought situation, and in 1977 Indian Valley came on line. He said the Council previously heard a presentation about the 1992 Water Plan update, and there are activities underway that were approved by their respective agencies. The City of Woodland participated also. He said the City is working with the City of Davis and the University of California at Davis on a master plan. Mr. Borcalli said under State law if the cities go through the process and if they are granted a permit to perfect that permit, the cities have the license. Indian Valley Reservoir was completed in 1975, and there is still a permit on it. The District has very deliberately not attempted to get a license on it but probably will soon. He said the license fixes the quantity of water that can be put in storage and used for beneficial purposes. By operating under a permit the District has really maximized the storage. He then discussed ideas of moving surface water to ground water supplies.

Mayor Sandy summarized that the City and the Water Resources Association of Yolo County are engaged in long range water planning and have been for quite some time, and there are a lot of good things happening in terms of water planning in the County.

Erik Vink of American Farmland Trust (a nonprofit farmland conservation organization) said his organization operates throughout the country and its California field office is located in Davis. In the last ten years they have focused on what is going on in the Central Valley with the loss of agricultural land to urbanization. He said they are very concerned about population projections from the State Department of Finance, and official State population projections going out to the year 2040 which show the Valley's population tripling during that period of time. In Yolo County the population is estimated to go from 150,000 to 386,000 people by 2040. He said his organization is interested in painting a picture of what that population gain would look like. He said they are concerned about good productive agricultural land and ensuring that it remains in production and is not urbanized. Comparing different modes of future development and different ways of accommodating those people, his organization was interested in the cost of providing public services to service the new development. He said their studies, working with researchers at the University of California at Davis and economists, showed that 8 million additional people under the current patterns of development would take about an additional million acres of

agricultural land. Mr. Vink gave Council a report based on a projection of where that growth would occur to the year 2040. His report compared two different scenarios: one million acres of farm land converted continuing our current patterns of development versus less than 500 acres utilizing a more compact efficient mode of development. The difference was an average of three residential units per acre under the status quo development which is averaging out residential development over the entire urban area and comparing that to a more compact efficient pattern coming in at an average of six units per acre. He said he is making similar presentations to city councils, county supervisors and community groups up and down the Valley in order to begin to generate discussion in other communities where they do not have a general plan update so far along in the process as Woodland's is. Mr. Vink said his group was very alarmed by the fact that the study indicated that by the year 2040 there will be a virtual linear city along Highway 99 which is the heart of the most productive farm land in the valley. He said his organization is interested in keeping development off that very good agricultural land.

Larry Mintier, the City's General Plan consultant, discussed the implications of the alternative growth scenarios. He said at the last meeting the Council and Commission directed staff and the consultants to report back with speculation as to the implications of selecting a population target lower than the 64,700 which is already built into the draft General Plan. Specifically Council and Commission were looking at two lower levels for population: 60,000 by the year 2015 which would result in a 1.7 percent annual compound growth rate and 58,000 by the year 2015 which works out to 1.5 percent annual compound growth rate. He said Council and Commission were concerned about how selecting either of those alternatives would effect the EIR analysis, the General Plan documents, perhaps the need for recirculation, and the fiscal and financial analysis for the Plan. First, he said the draft General Plan designates land to accommodate a population of approximately 64,700, and that is based upon SACOG projections. He said that is an approximate holding capacity and is only theoretic. There are several things that could affect the likelihood the City would reach that number by the year 2015. First that population figure assumes that virtually all of the land vacant and underutilized designated in the General Plan for urban development would be developed by 2015. The population projection also assumes that 35 percent of the housing stock will be developed as medium density. Whether market conditions could support that 35/65 split is anybody's guess. He said the point is that 64,700 was used as the target, and the figure is a benchmark and is theoretical. There are a lot of market factors which could affect the ability of the City to reach that figure. He said there are three ways to achieve a lower annual average growth rate or conversely a lower population target or level in the year 2015. First land which is designated for urban development could be taken out of the General Plan. To achieve 64,700 the City needs roughly 1,400 acres beyond the existing City limits. If that figure is dropped to 60,000

population or 1.7 percent growth rate, the land requirements drop from 1,400 to about 1,000. If the population target is dropped to 58,000, or the 1.5 percent growth rate, the land requirements drop to about 850 acres, or another 150 acres beyond the 60,000. Mr. Mintier said removing land from the General Plan is going to reduce the infrastructure requirements, but it is not going to be one for one. The infrastructure requirements will not go down in direct proportion to the reduction in the population. Also, it is going to make a difference when that land is removed from the General Plan. In most cases removing land will have a positive effect or simply reduce the aggregate level of impacts, but the City in a few cases may find out that the City has unanticipated impacts, such as increasing traffic in the existing City. Under land use scenario Alternate 1 with a straight band across the south, if the Council/Commission were to reduce the land it would be impossible to get a roadway in that narrow band. That would probably force traffic to the north into the existing City limits. Overall reducing the land will reduce the impacts, but there will be shifts in impacts, making some of them worse. He said probably the City would not have to recirculate the EIR, but reducing the land could potentially raise the per unit cost of housing for a development because the City could not cut back on the infrastructure. A second method is to leave all that land in and simply reduce the average density which uses land less efficiently. He said if there is less development and less total housing units in a given area the impacts in the aggregate are going to drop. There will be fewer people, fewer cars and fewer impacts, but the City will probably not be able to cut back the infrastructure in anything directly proportional to the amount of development that has been eliminated from the Plan. He said the City would be stuck with the same basic infrastructure requirements and fewer units of development to pay for that infrastructure package. He said probably this alternative would conflict with a lot of policies in the Plan that promote compact urban development and efficient patterns of development with a more pedestrian friendly and transit friendly environment. He said it is more difficult to service a dispersed population, but he said Mintier and Associates is not certain it would require recirculation of the EIR. He said they feel it is more wasteful of the given resources, and the Council would have to seriously consider the significance of spreading the given infrastructure package price tag over fewer units. The third alternative for reducing the target population for the year 2015 is to leave the same amount of land in but reduce the rate of growth, so the time frame is stretched out. The question is which mechanism to use to do that, and he said the market may deliver up the lower growth rate. He said for example if the City were looking at a 1.5 percent annual growth rate, the City would hit 58,000 population in the year 2015 but it would take seven more years to build it out to 64,700. At 60,000 by the year 2015 there would be a 1.7 percent annual growth rate, and under that scenario the build out would occur in 2019 or 24 years. He said there is a complicating factor with this method because there is the question of whether the City extends the time frame just for

residential or extends the time frame for nonresidential, including retail. To a large extent, but not completely, the nonresidential is dependent on the residential in the area of retail sales. If population growth rates are reduced, the City will lose retail sales, but it is not as clear a link to industrial employment. If the Council favored stretching the time frame for residential, it would make sense to stretch the time frame for nonresidential. This method probably would not require recirculation, but it could have the implication of making the financing more expensive. The cost of borrowing will be more expensive. The other alternative is to stretch the residential time frame but not stretch the nonresidential. Mr. Mintier said the draft General Plan is based on a 2 percent annual population growth rate and a 4 percent annual employment growth rate. If the Council decides to go down to 1.7 or 1.5 percent growth and keep the employment growth rate up at 4 percent, the City will reach its target by the year 2015 but the residential is stretched beyond that. The City will be adding in additional employment growth to reach parity with the residential. To choose that option, the City would have to recirculate. He said this is the one area where there are going to be increased impacts because of increased employment.

Commissioner Moore asked how the City stretches out the time frame.

Mr. Mintier said there is no mechanistic growth control program. The General Plan was drafted with the assumption that the requirement for specific plans would be the primary tool, at least for residential development, by which that got sequenced and development occurred in a smooth fashion over time. He said the City would be relying on the specific plan requirement to even out the growth rate. When the time frame is stretched by four years or seven years, he said it becomes more problematical and becomes a bigger issue. He said when the market keeps the City growing at 1.5 or 1.7 percent there is natural demand, and there is no problem, but the question is when there is five percent one year and then eight percent another year. He said he would not suggest any kind of annual growth control mechanism where you rate projects.

David Freudenberger of David Taussig and Associates, the City's economic consultant for the General Plan, discussed the financial impacts associated with the change in population. He said if the Council/Commission were to reduce the population and the number of residential units and tried to relate the infrastructure to that ultimate number, the amount of infrastructure would be less and the physical and geographical location would be different. He said that would probably be some reduced infrastructure cost, but indirectly there are two basic components of infrastructure cost. There is fixed cost and variable cost, and there is a fixed cost associated with something like expanding the sewer treatment plant. There are variable costs associated with the number of roads and the mileage associated with

the roads required to serve a certain area. If Council reduces the population, the annual burdens associated with the infrastructure will probably come down somewhat. On a per unit basis the cost of infrastructure will probably be higher. He then reviewed with the Council a memo prepared by Susan Goodwin of Taussig and Associates. In terms of the fiscal analysis he said if the population is reduced there may be corresponding reduced employment. He said there is a direct link with retail/commercial. Industrial and business employment will need to have a population base to draw their employees which would be a link but not a direct link. For 60,000 population assuming no reduction in commercial would be Alternative 1, and Alternative 2 would assume there would be a corresponding reduction in retail commercial. The same would apply to 58,000 population. Under build out population of 60,000 assuming the retail demands continue to be at the level we have assumed all along there would be a fiscal impact at build out of about \$460,000. By reducing the population and keeping the retail the same and the employment development the same, the City will go from a \$320,000 deficit to a \$460,000 surplus which is about a \$780,000 switch. If it assumed that the retail uses decrease at a rate which corresponds to the decrease in the population, the fiscal impact at build out is about \$120,000 positive which is about a \$440,000 switch. With build out population of 58,000 there would be an \$800,000 surplus at build out assuming no retail reduction and about a \$320,000 surplus assuming corresponding retail reduction. The retail reduction under a 60,000 population scenario is about 26 acres which is about 19 percent of what is being proposed now with the draft General Plan. Under the 58,000 population it is about 38 acres or 28 percent. He said this shows that given the market conditions, the land use mix and service standards in the City of Woodland, there is a net fiscal deficit associated without adding every person to the City. When you add people to the City you generate the demand for retail and generate the employment base. There obviously is a link between residential and nonresidential.

Mayor Sandy opened the public hearing.

E-3-1 [Dona Mast, President of the Yolo County Farm Bureau, said in 1994 agricultural crops produced \$297,905,469 which does not include that the third party of these producers shop in Woodland. She said this has a significant impact on Woodland and the balance of trade. She said the Farm Bureau supports a 1.5 percent annual growth rate instead of 2 percent. Regarding water, she said the water that percolates by irrigation of farm land is a lot different than water that comes from the lawn watering because a lot more water goes down to the sewer system.

E-3-2 [Dudley Holman spoke about the EIR and the water issue. He said he finds the comments in the General Plan documents to be lacking. He noted that on page 5-1 of Chapter 5 of the Draft Environmental Impact Report for the General Plan it is pointed out that the City's sole water supply is currently ground water. He

E-3-2
(CONT)

said he knows that but there are a lot of people in the community who do not know that. The City has no back up supply or alternate supply, and we understand there are moves being made to augment that in some fashion through cooperation with other operations in the County. He said we hope that will be successful. On that same page it states that "For purposes of this Draft Environmental Impact Report, the City's future water system is assumed to rely on ground water supply." He said there is a little weakness in counting on the underground water supplies taking care of us in the future. The following sentence states "Although the City continues to participate in regional efforts to investigate the use of surface water supplies, the ability to acquire surface water rights is uncertain, and development of a surface water supply system would be a long-term effort that would take many years and additional environmental review." He said he agreed that we do not know how many years that would take. He asked if that was comforting as far as suggested mitigation and is that enough. He said obviously our supply is very questionable and our efforts to get more although underway are undetermined. He said he would like to see the EIR, if possible to suggest some additional possibilities, other mitigations that we might be looking for to take care of our community's future.

Mayor Sandy asked Community Development Director Janet Ruggiero to make a note of Mr. Holman's suggestion.

E-3-3

Reed Youmans passed out information sheets regarding land use alternatives: one which addressed the strengths of Alternate 1, one which addressed the weakness of Alternate 1, and one which addressed to the weaknesses of Alternate 2. He said his company has a small parcel of land that exists in Alternate 1 and he spoke to the strengths of Alternative 1. He said the existing residents of Woodland will benefit from the new schools, new ball fields, large community park and large neighborhood shopping center. Zamora and Gibson Schools are continually crowded, and there would be a new elementary school in this area to relieve that pressure. The soccer fields and Little League fields could be easily reached by children in this area by bicycle. All of Woodland will enjoy a community park that is centrally located and easily accessed. A neighborhood shopping center on West Street will relieve congestion on Gibson Road for those people who live south of Gibson Road. An east-west arterial connecting Road 98 to East Gibson Road will be at Matmor Road and will provide a good alternative to Gibson Road. This arterial will be directly in front of the new Woodland Christian School, and that will begin to create quite a bit of traffic as that is developed. He said it has been widely accepted that Woodland needs more executive style housing, and it seems most appropriate to put that arterial by upscale housing. He said the General Plan continues to focus on the central business district, and this will be needed by development along the existing north-south arterials. Neighborhoods on the southern edge of town will maximize the existing community services, for example the fire station on West Street. The primary weakness of Alternate 1 is

E-3-3
(Cont)

that it is on prime ag land. He said also new housing in Planning Area 1 and in the new General Plan is largely east of State Route 113. He said this will separate the City with the new houses east of the highway, east of the Mall, east of the fairgrounds and east of the East Street Corridor. All of the new parks, schools and shopping centers will be inconvenient to the existing residents. By placing the new parks, schools and ball fields east of town, Main Street and Gibson Road will be the only alternatives. He said it is hard to believe that someone on Gibson Road would drive south a mile to Road 25A, across Road 25A and back a mile to the high school or to the Community College. The new Woodland Christian School will also be located on East Street and State Route 113, and this will create a significant amount of traffic in the morning and in the afternoons for kids going to school. There will also be significant conflicts created in new Woodland east of State Route 113 and old Woodland. He said it is generally agreed Woodland needs new executive style housing, and it does not seem quite appropriate to put this behind the Mall, behind the County jail or along the freeway. Finally, he said development of State Route 113 will make the Mall more central and it will be taking more business away from downtown businesses. When these things are considered with the General Plan outline and goals there is significant benefit to Alternate 1. He also noted four significant impacts listed by the General Plan EIR.

E-3-4

Tag Demment, member of the baseball subcommittee for parks and recreation and member of the committee involved in developing the baseball master plan, said although he and other baseball supporters may not agree on what development should take place, if development takes place, they want the Council to place baseball fields in a high priority. He said the City has never actually constructed a baseball field. The City took over Clark Field in 1937 and any new ball fields added to the community since have been done by the School District. He said those fields have been renovated by volunteer groups, but the City has decreased its commitment to maintenance to those fields. He said while the future and the past are somewhat separate development issues, they are inextricably linked. For the future he said his group is putting together a baseball master plan which they hope will be incorporated into the General Plan for the community. He said they would like to see the General Plan (1) provide for a front loading of recreation facilities in general and baseball facilities in particular and (2) serve as a basis for development of present facilities. He said the value of our homes is not set so much by the taxes but by the community we build. He urged the Council to give very strong consideration to the incorporation of recreation facilities and baseball facilities and to use the baseball master plan as a mechanism and a prototype for incorporating planning for other recreational sports into the General Plan.

Vice Mayor Rominger asked how far the City is behind.

In terms of lighted baseball fields Mr. Demment said the City

is at about 25 percent of our standard. He said there are two types of baseball fields: Little League fields and other baseball fields which are full size fields. He said the most impacted group in our community is the group which uses full size fields. Full size fields and lighted fields are at a premium; the City has one lighted facility.

E-3-4
(Cont)

Vice Mayor Rominger said Mr. Demment is suggesting that currently it would be desirable for the City to have four such fields.

Mr. Demment said the baseball master plan includes a series of alternatives which are being presented to the community to allow input on the various alternatives for solving problems to be explored and the financial accounting of those alternatives to be analyzed. Then we can come back and make decisions on types of funding sources and what types of alternative would be the best. He said the assumption is that the City is so low on facilities the schools and City would jointly use fields.

The Community Development Director said she and Parks, Recreation and Community Services Director Tim Barry met and talked about this issue, and they already had an implementation program prepared for the master plan. She said they talked about adding a policy about implementing the baseball master plan once the General Plan is adopted. The other issue, she said, is the front loading of recreational facilities, and that relates a lot to our legal ability to do that and looking at that in reference to the specific plans. She said that is something that can be looked at, but that is a major change in policy from what we have now.

E-3-5

Dave Taormino said he supports Alternative 1. He said Alternative 2 is a lot more than it appears. He said as you review the EIR, policy documents and other documents, you do not see the granting of an exclusive monopoly or exclusive franchise for the next 30 to 35 years for essentially residential development for the City of Woodland. He said Alternative 2 provides an exclusive franchise to a single development partnership. Part of the ability for their promises and representations has been the fact that they do control all of this land and will be able to deliver. He said with Alternative 2 they are essentially the only ones being allowed to develop in this community. He said if Bank America came to the City and said they wanted to be the only bank in the City of Woodland for the next 20 to 25 years and will do good things and will be efficient, that would be met with a tremendous amount of skepticism. He said the EIR is silent about this; the EIR looks at environmentally related issues. He said when economics become so significant and so substantial they can become environmentally related. He asked if the City of Woodland would be skeptical if Dave Taormino was the only developer for Alternative 2. He said this would be a complete departure from choices, competition and variety which the City has talked about for the past eight years. With an exclusive franchise the City will not get that choice. In

143

terms of dollars with Alternative 2 there is essentially a \$400,000,000 project. Once that monopoly begins it will continue and other groups will not be able to come in. He said the monopoly has to be debated. He said when you look at Alternative 1 and the balance and opportunities for the ball fields, traffic mitigation, it meets the Farm Bureau half way with their concerns and could meet their concerns all of the way with a good conservation easement program funded by development fees. Most importantly, he said Alternative 1 provides competition.

Al Beard, resident of Woodland and Member of the Parks and Recreation Commission, addressed the financial analysis. He said they were told the maintenance figures used were based on the current maintenance budget, and the Parks and Recreation staff has indicated their current maintenance level with current parks is substandard to our population and the number of acreage. Maintenance of the current parks is substandard based on the current budget and budget cutbacks experienced over recent years. He said the Commission would like to make note of that in future consideration of the General Plan update. He referred the Council and Commission to Table 4 of the financial analysis. He said the old standard used in the current General Plan was one acre per thousand for neighborhood parks, two acres per thousand for ball fields and community parks and three acres per thousand for the regional park. This was the suggested standard the Commission used of six acres. He said the Commission spent considerable time revising the standards (to catch up to our needs) to one acre per thousand for neighborhood parks, two acres per acre for community parks, three acres per thousand for the regional park, and an additional four acres per thousand for sports fields and facilities. This makes a total of ten acres per thousand. He said it has been suggested that the consultants use the six acre per thousand figure which is the old standard. He said the Commission proposes that the ten acre per thousand be used, back out the regional park since it is already in existence, and use a seven acre per thousand standard in the General Plan update. He said they firmly believe this would be more representative of what the City's needs are and what they will be down the road. He said the Commission also suggests that Table 4 with the Regional Park listed with 73 acres and estimated development costs of \$115,000 per acre with no capital cost of purchasing land be revised. He said this projects to about \$8.4 million in total estimated cost, but there is a big portion of the park which is not capable of being developed. He said that future should be adjusted downward. Regarding front end loading for future development, the General Plan document should be more proactive in developing parks and recreational facilities needs as the population grows. He said the City should be involved in acquiring land early in the development process so that the City is not paying \$100,000 an acre or the highest cost. This would mean exploring predevelopment agreements with developers and upfront fees. He said the City should also look at other ways of utilizing existing land or trading existing land for land elsewhere.

E-3/6

E-3-7 [John Murphy said he is a homeowner and expressed his support for the overall principles which the General Plan update summarizes. He said one thing he likes best about Woodland is the way we conserve farm land without a no growth policy, and way people can maintain contact with City government without having to go through many intermediate steps. He said he likes the fact that the two alternatives do not provide for strip development which would allow Woodland to grow further to the east and further down I-5.

E-3-8 [John Hunter said he represents Little League and youth sports but was present at the meeting on behalf of baseball in general. He said he is not that familiar with the General Plan update, but he said there is a need to increase our standards. He said Woodland is a baseball community and many youth have received baseball scholarships. He said there are professional scouts and recruiters coming to Woodland looking at our baseball players. He said there are people fighting for fields now, and we can produce a better group of ball players with better opportunity. He said he hopes the Council will agree to adding language to the General Plan to upgrade some of the standards.

E-3-9 [Rick Elkins said he is against monopolies also; however, he said he wanted to say that Michael Beeman would be the first one to tell the City that his firm does not represent Mr. Beeman in the Alternate 2 area. Stanley Davis Homes also has property in the Alternate 2 area which his firm does not represent. He said Baker and Prudler own the property south of the Mall which his firm does not represent, and he wanted to clear up that misunderstanding.

Mayor Sandy closed the public hearing on the draft EIR.

The Council/Commission took a recess from 8:40 p.m. until 8:58 p.m.

Mayor Sandy reminded the public that written comments may still be submitted on the draft EIR for the General Plan update until tomorrow, November 29, 1995, 5:00 p.m. He asked for Council and Commission comments on the draft EIR.

Vice Mayor Rominger said she and City Water Conservation Specialist Harrison Phipps agreed that water conservation needs to be emphasized in the EIR for the General Plan as a way of generating an additional water supply. She suggested that we put into our implementation plan discussion about requiring property owners who do major remodels to existing homes to put in low flow shower heads and toilets and that a certain threshold be established to require them to retrofit to become meter ready. Also, she said Commissioner Fernandez voiced concern about ag land and surface water and making sure there is an equal exchange of water that is being used when ag land is developed. She said she was concerned that there should be an equal exchange from the

previous ag land use to the new urban use. She said some of the land that surrounds Woodland which could be developed may currently be using surface water. If surface water is used and not ground water, she said houses built on the property will result in a net increase in the usage of ground water rather than an exchange of water use.

Mayor Sandy said page 5-7 of the draft EIR under "Water Supply and Delivery" outlines a number of ways of promoting efficient water use and reducing water demand. He asked if Vice Mayor Rominger wanted to add to those.

Director of Public Works Gary Wegener said page 5-9 of the draft EIR states that those policies which Mayor Sandy referred to should be modified to require water conserving landscaping and other conservation and over time retrofitting all existing development with water conserving devices.

The Community Development Director said the suggestion is to change the draft Policy Plan to include these mitigation measures in the Policy Plan, and this added language would take place of what is in the draft EIR.

Planning Commissioner Schwartz said in regard to Table 10-1 of the draft EIR regarding "Comparative Impacts of Alternatives" there has been a lot focus of attention on the pros and cons of Alternatives 1 and 2. He said in a couple of instances the Table is not as comprehensively reflective of some of the differences between the alternatives as the underlying background text would suggest. Page 10-8, he said, discusses the alternatives of agricultural land, and the text under "Preferred Alternatives" is almost identical for Alternative 1 and 2. The draft EIR itself on page 3-11 says clearly that Alternative 1 overall encompasses higher quality soils for agriculture. He felt that distinction or clarification should be made there. Also, he said, on page 10-12 under the discussion of the impact on water supply and delivery the language for both alternatives is the same, but on page 1-17 it clearly states that there is more of a potentially significant impact for Alternative 2. His concern was that some people would just look at the chart and try to make their evaluation based on that.

Mayor Sandy said our water consultants are present at the meeting, Gary Meyerhofer and Karen Johnson. He said page 5-4 of the draft EIR states that "These estimated agricultural demands are presented in Table 5-3. In addition, urban water demands for these same lands were projected for comparison with the existing irrigation water applications. Subtracting the future urban water demands from existing agricultural demands results in a projected surplus of water." He said in Table 5-4 adds the existing City urban demands for water to the existing agricultural demands and then the projected build out demands are subtracted. That results in a deficit, and he said he does not follow that comparison.

Karen Johnson of the water consulting firm of Montgomery-Watson said this Table looks at the entire study area and not just the areas that are currently under ground water irrigation applications. She said if you looked at just ag lands that are using ground water versus a certain average development, there is an almost even exchange. Based on Alternatives 1 and 2 land use plans there is lower water use factor for urban than for the agricultural land so there is a surplus. She said if this is applied to the entire study area and all of the lands that are proposed to be developed under the two alternatives, there are lands included that are not currently under agricultural production.

Mayor Sandy said the EIR addresses subsidence. He said it is his understanding that subsidence around the City is a historical phenomena and has occurred over many years. He said he felt it is important to mention that in the EIR. He said he felt there was not sufficient addressing of the flooding issue which could be addressed in another section of the EIR. He said there should be a good explanation of how the water table works in regard to ag pumping. He asked if the EIR addresses water transfers.

Planning Commissioner Fernandez said he previously asked that the issue be included in the Policy Document.

Karen Johnson said page 5-7 of the draft EIR under "Water Supply and Delivery", Section 4.C.1 states that the City shall continue to investigate the possibility of surface water supplies for domestic and/or agricultural use within the Woodland Area. She said that could include exchanges, conjunctive use programs, water rights applications, etc.

The Community Development Director said she has received several letters on the Policy Document, and she gave Council and Commission Members copies of the letters with staff comments. She said the Planning Commission will receive any additional comments at its December 7 meeting. At that time the Commission will also consider other policy decisions previously discussed at the Commission/Council level.

Vice Mayor Rominger said staff has typed her comments and questions, and she will review them with staff before presenting them to the Council and Commission.

Commission and Council Members discussed population projections. They agreed that recirculating the EIR was not an option.

The Community Development Director requested a brief recess. The Commission and Council took a recess from 9:47 p.m. until 9:57 p.m.

The Community Development Director said what staff and the consultants were asking the Council and Commission to do was unfair because the impacts of taking in the land area varies with the Alternative, and Council and Commission have not decided on which Land Use Alternative. She said there are two ways to deal with the issue. First the Commission and Council can decide on a rate of growth. Then the Commission and Council would make a selection on the Alternatives in terms of reduction of land area. Staff can then look at what the implications are on the Alternative selected because they vary between the Alternatives. She said the second way is still to decide on the rate of growth but simply lengthen the time line. If the time line is lengthened, the EIR would not have to be recirculated. The land area would not be reduced. The time line would be expanded to a 25-year plan, and at such time as the specific plans are developed the land areas would be looked at together with the rate of growth. At that time other implications would be reviewed including financing, what lands are under Williamson Act contracts, and using the specific plan as the vehicle.

After a request from Commissioner Fernandez regarding rate of growth, the Community Development Director said a 64,700 population projection results in a 2 percent rate of growth; a 60,000 population results a 1.7 percent rate of growth; and a 58,000 population results a 1.5 percent rate of growth.

After further discussion the Council and Commission reached a consensus that the population projection shall be 64,700, that the time line be stretched an additional five years to 25 years, that the land area remain the same.

Council Member Borchard said because of the linkage between growth rates and population and development in the south he cannot and did not participate in that decision of consensus.

Mayor Sandy reminded the audience that the Planning Commission will hold a public hearing on the General Plan including the Alternatives on December 7, 1995, at 7:30 p.m. The City Council will hold a public hearing on the General Plan on December 19, 1995, at 7:00 p.m.

ADJOURNMENT:

At 10:15 p.m. the meeting was adjourned.

City Clerk of the City of Woodland

RESPONSES TO COMMENTS

A-1 California Department of Transportation (November 29, 1995)

A-1-1 Policy 3.A.2 was modified, establishing LOS D or better as the standard for any roads within ½ mile of a State or Federal highway and within Downtown. As a result of this change, the impact to Main Street between Industrial Way and the Interstate 5 (I-5) Southbound Off-Ramp is characterized as potentially significant in the FEIR, even though the traffic volumes and levels of service for these roadways did not change between the Draft and Final EIRs. Improvements that could mitigate this impact include the following:

- 1) Widen Main Street to six lanes; or
- 2) Construct an improved connection between I-5 and State Route 113 (SR 113).

Widening Main Street may not be feasible because it will create adverse environmental impacts related to right-of-way acquisition such as the removal of existing private businesses and other public infrastructure. The construction of an improved connection between I-5 and SR 113 is currently under investigation as part of the I-5/SR 113 Project Study Report (PSR). This PSR is evaluating alternative means by which traffic travelling between I-5 and SR 113 can be accommodated without using Main Street. One of the performance standards by which the alternatives will be evaluated is Policy 3.A.2 as revised above. It is the City's intent to maintain LOS D on this section of Main Street to the extent possible without creating other substantial environmental impacts.

Concerning the urban street LOS analysis, it is important to understand that LOS intersection analysis is not required in a general plan circulation element under *Government Code* Section 65302(b). Intersection LOS, however, will be analyzed as individual development projects occur as required by Policy 3.A.4. Further, the roadway segment LOS analysis contained in the EIR uses conservative estimates of roadway capacity to ensure that roadways are sized appropriately.

A-1-2 A review of Figure 4-2 and Table 4-6 in the DEIR revealed inconsistencies between the number of lanes identified for Main Street between East Street and County Road 102. This roadway is currently four lanes as shown in Table 4-4 of the FEIR, however, Figure 4-2 of the DEIR indicated only two lanes. In addition, Figure 4-2 should have shown four lanes on County Road 101 from Main Street to Kentucky Avenue. Figure 4-2 (renumbered as Figure 4-1 in the FEIR) was revised to reflect these corrections.

Figure 4-1 is intended to show the proposed circulation diagram including roadway functional classification and number of lanes. Traffic volumes for roadways that were impacted under the new General Plan are reported in Table 4-4. Additional information regarding traffic volumes for specific roadway segments is available upon request from the City of Woodland Public Works Department, 300 First Street, in Woodland. In general, though, the future daily traffic volumes for SR 16, SR 113, and I-5 are as follows:

- SR 16 = less than 10,000 vehicles per day between Kentucky Avenue and Main Street;
- SR 113 = less than 35,000 vehicles per day between Road 25A and Main Street; and
- I-5 = less than 40,000 vehicles per day between West Street and East Street, less than 53,000 vehicles per day between East Street and SR 113, and less than 55,000 vehicles per day between SR 113 and County Road 102.

These volumes are within the capacity of the roadways and the impacts are therefore less-than-significant.

With respect to the General Plan's impact on the regional transportation system, in addition to the state highways and sections of Main Street, the traffic analysis includes roadways that carry a substantial amount of regional traffic such as County Road 98 and County Road 102. Prior to and independent of the General Plan update, the City recognized the need for an improved connection between I-5 and SR 113, reiterated in this EIR, and a new interchange at County Road 102. Further, Policy 3.A.6 requires the City to assess fees on new development sufficient to cover the fair share portion of that development's impact to both the local and regional transportation systems. Therefore, the impacts of individual local development projects on the regional transportation system will be addressed as individual development on projects and reviewed and approved.

- A-1-3 The City of Woodland will use the Caltrans guidelines for the minimum distance between signalized intersections on West Street in the design of the new east-west road connecting County Road 98 and West Street. A minimum of 600 feet will be provided with the understanding that 800 to 1,200 feet is desirable.
- A-1-4 Reconstruction of the existing interchange at County Road 102 will be needed in conjunction with the proposed six-lane widening of this roadway. The cost of interchange reconstruction is included in cost estimates for initial work for the Street Master Plan, which is currently being developed and will implement the General Plan. The ultimate configuration of the interchange is being examined as part of the I-5/SR 113 PSR, which will rely on year 2020 traffic forecasts as directed by Caltrans.
- A-1-5 The figures were combined into one figure in the FEIR, and revised as noted.
- A-1-6 The EIR describes drainage improvements needed to serve projected development under the General Plan. Policies and programs of the General Plan Policy Document (see section 4.E) reduce the impact of development on the drainage systems and flood potential to state highway facilities to a less-than-significant level.
- The policies and programs of the plan provide for detailed storm drainage planning. An update of the Drainage Master Plan is scheduled for completion in 1996 (General Plan Implementation Program 4.1).
- A-1-7 Policy 3.A.12 was added to respond to Caltrans' concern.
- A-1-8 The EIR analysis was based upon a regional traffic model that is consistent with and analyzes impacts on the regional transportation system. Key improvements to the regional transportation system include an improved connection between I-5 and SR 113 and a new interchange at County Road 102. Construction of the new interchange at County Road 102 is assumed in this EIR, while a separate funding analysis is to be included as part of the I-5/SR 113 PSR. Refer also to response A-1-2.
- A-1-9 Right-of-way needs are addressed in Policy 3.A.1 for City streets. Future right-of-way needs for an improved connection between I-5 and SR 113 will be studied as part of the I-5/SR 113 PSR, and corridor protection provided for the selected route according to Policy 3.A.7.

- A-1-10 Policy 3.A.1 does not clearly address right-of-way needs for facilities such as an improved connection between I-5 and SR 113 since the location of this facility has not yet been determined and is therefore not shown on the Circulation Diagram at this point. Policy 3.A.7 was revised to state that City policy is to provide corridor protection for the preferred option that results from completion of the I-5/SR 113 PSR.
- A-1-11 The City's local street system provides good mobility for local trips in corridors parallel to SR 16, SR 113 and I-5.
- A-1-12 Fehr & Peers, the City's transportation consultants, reviewed the Caltrans Traffic Volumes publication for the years 1991 through 1994. This review, which was conducted at the beginning of the General Plan process, showed that daily traffic volumes on SR 16 remained relatively unchanged over the four year period. According to Caltrans District 3 Traffic Census, this occurs because many locations on the state highway system are only counted every three years. Therefore, Fehr & Peers conducted daily traffic counts in early 1995 for SR 16. This count data was used for the General Plan because it more closely matched observed traffic conditions.
- A-1-13 The *Background Report* contains intersection analysis because this information will be used for other purposes such as the Street Master Plan and subsequent project EIRs. For the purposes of the General Plan, only roadway segment analysis was necessary as discussed in response to comment A-1-1. Intersection LOS analysis is not required in a general plan circulation element under *Government Code* Section 65302(b). Further, the inclusion of intersection analysis is not necessary to determine the likely impacts of projected growth on the roadway system. The planned roadway system is intended to accommodate projected traffic levels within the City's level of service standard (see level of service policy discussion in response A-1.1). Policy 3.A.2 establishes service level standards for the City's roadway system, including street segments and intersections. The specific process that will be used to ensure that adequate traffic operations are maintained throughout the city is spelled out in Policy 3.A.4, which requires an analysis of traffic effects from major development projects. Therefore, impacts to specific intersections and roadway segments will be identified and mitigated as development occurs.
- A-1-14 The freeway access discussion in the *Background Report* was revised to state that County Road 98 and West Street also provide access to I-5, while County Road 25A provides access to SR 113.
- A-1-15 Although Circular #373 and the new 1994 *Highway Capacity Manual* (HCM) use a different approach to analyze multi-way stop controlled intersections, the statement that these methodologies are more accurate is incorrect. Fehr & Peers has used all three methodologies extensively in various projects and has determined that both the Circular #373 and 1994 HCM methodologies can produce results that do not match observed traffic conditions. The Consultants have not had similar problems with the 1985 HCM methodology and therefore continue to use this methodology, particularly for planning purposes.
- A-1-16 This is an existing problem that is not an impact of future development under the General Plan. The City will consider existing drainage problems in connection with development of the *Storm Drainage Master Plan* (Implementation Program 4.1). The City has plans to signalize this intersection in the near future and will examine the localized flooding problems in connection with this roadway improvement.

Responses to Comments

A-2 California Department of Fish and Game (November 29, 1995)

A-2-1 Comment summarizes the project description. No response necessary.

A-2-2 Comment supports General Plan policies. No response necessary.

B-1 Yolo County Farm Bureau (November 28, 1995)

B-1-1 Comment supports the conclusions of the EIR.

B-1-2 Comment noted. The General Plan was revised to extend the time frame from 2015 to 2020 for development of agricultural land designated for urban uses, effectively lowering the average annual growth rate to approximately 1.7 percent.

B-1-3 Comment regarding existing residents conserving water is noted. The existing consumption within the city is higher than the statewide urban average; this is likely due to weather conditions and the lack of metering of single family homes. Response to comment C-2-6 identifies many commonly used conservation practices which are practical to implement.

Comment regarding potential new water sources is noted. Policy 4.C.1 has been modified to reflect an increased effort to investigate new water supplies for agricultural or urban needs.

B-1-4 The EIR considers the Eastern Growth Alternative as an alternative to avoid the impacts on prime agricultural lands. The City also considered the Eastern Growth Alternative in developing the alternatives to be assessed in the EIR and in selecting a preferred alternative. See responses to letter C-3.

B-1-5 This comment supports the conclusions of the EIR.

B-1-6 This comment supports the conclusions of the EIR.

B-1-7 This comment supports the conclusions of the EIR.

B-1-8 This comment supports the analysis in the water section of Chapter 5 in the EIR.

B-1-9 Comment noted. This does not change the conclusions of the EIR, which focuses on the physical impacts on the environment.

B-1-10 Comment noted. This comment would also indicate a preference for the No Project - 1988 General Plan Alternative. As noted under the response to B-1-2, the effective annual growth rate has been lowered to approximately 1.7 percent.

B-1-11 The General Plan does not recommend converting County Road 25A to a four-lane roadway. County Road 25A will remain as a two-lane rural collector that will carry about 2,500 vehicles per day in 2015 to 2020 between County Road 98 and East Street and about 6,500 vehicles per day between East Street and County Road 101. Given the current condition of this roadway, some improvement will be necessary to accommodate these volumes, such as pavement rehabilitation and shoulder widening. The timing of improvements will be determined as development occurs, as required by Policy 3.A.4. It should also be mentioned that the I-5/SR 113 PSR includes County Road 25A as one of the alternative connectors between I-5 and SR 113.

Responses to Comments

B-2 Sacramento Area Council of Governments (November 7, 1995)

- B-2-1 The City of Woodland will follow the regional planning process for incorporating transportation improvements in the MTP. Further, the City has already included a number of policies in the General Plan that are directed at minimizing environmental impacts.

B-3 RD No. 2035 (November 29, 1995)

B-3-1 The comment regarding the general conclusion that increased urban development will not result in a significant impact to the water supply is mixed with the specific analysis of the estimated agricultural water use being higher than that required for the average urban land use on a per-acre basis. To avoid confusion, the FEIR eliminates statements in the DEIR that subtracting water demands from agricultural irrigation applications for these lands resulted in a surplus, since these statements were not relevant to the ultimate conclusion of the EIR.

The EIR has been revised to clarify the intent behind the impact analysis. Due to the lack of detailed information on aquifer characteristics, the EIR impact analysis was based on an estimate of increased groundwater use over that occurring presently on an average annual basis. The current use was based on an estimate of agricultural groundwater usage on lands to be converted to urban uses and added to the current City well production estimates. An increase in groundwater use within the Planning Area would not necessarily result in a significant impact to the aquifer or result in additional subsidence. To address the possibility of an impact occurring, mitigations were included to reduce current and future urban water consumption and identify the safe yield of the groundwater basin (Policies 4.C.1 through 4.C.10 and Implementation Programs 4.5 through 4.8).

These policies commit the City to protecting the groundwater basin from overdraft by identifying the safe yield and developing a response plan if an imbalance between safe groundwater yield and projected water requirements are identified. This response plan could include conservation measures, reuse, surface water supplements, and other water management techniques. Prior to identification of safe yield, Policy 4.C.3 restricts new development to water usage levels that would result in no net cumulative increase in groundwater use in the Planning Area. Also note that policies were revised to clarify the studies of the groundwater basin and exploration of various water supply options that the City is currently involved in or intending to pursue (see Policy C.1.1). These policies also encourage the City to develop long-range water management programs. Implementation of these programs will aid in detecting and preventing future water supply problems.

B-3-2 The EIR acknowledges the benefits of groundwater recharge from irrigation water. A comparison of the amount of water percolated from agricultural irrigation versus the amount percolated from urban applications cannot be made without a more detailed analysis. A detailed analysis would identify the specific agricultural water usage on lands designated for urban development, evaporation losses, irrigation efficiencies due to specific irrigation practices, and other issues. This estimation of recharge effects would be too specific for a general plan and in the context of the overall impact would likely not change the conclusions of the impact analysis results, since this analysis addresses cumulative long-term water consumption. More detailed information will be developed in future water management studies efforts proposed by the General Plan Policy section 4.C.

B-3-3 Although the DEIR did not conclude as stated that urbanization will reduce the impact of pumping on the local groundwater basin, the comment regarding the increased impervious cover resulting from urbanization is noted and the EIR modified to reflect this comment. Stormwater drainage Policy 4.E.2 encourages specific project designs to minimize impervious coverage. Policy 4.E.8 addresses the use of stormwater for replenishing the groundwater basin and irrigating agricultural lands. An analysis of impervious cover is not likely to result in a change to the impact analysis

- results, as these address water use at a planning level of detail to analyze the long-term, cumulative effects on water supply. See also response to B-3-2.
- B-3-4 Comment noted. Subsidence within the city has occurred when the groundwater levels were extremely low for extended periods of time such as during the 1976-77 drought and the more recent drought of the early 1990s. Predicting subsidence impacts in specific areas resulting from either urban or agricultural pumping would be speculative due to the complexity of the Yolo groundwater basin, difficulty in making estimates of future aquifer conditions, and the lack of specific geologic data available to adequately predict potential subsidence occurrences. Policy 4.C.1 was modified to include the consideration of a water management program such as conjunctive use which would aid in stabilizing groundwater levels.
- B-3-5 Because of the complexity of the Yolo groundwater basin, any estimates of the long-term availability of the aquifer supply and prediction of future aquifer conditions would require a regional and more detailed assessment than that typically required for a general plan. Policy 4.C.5 addresses the need for an analysis of the long-term groundwater availability, along with other potential water supplies. This policy states that the City will work with other agencies in the county in developing a groundwater model to assess the effects on the aquifer from long-term water usage.
- B-3-6 The quality of water from the municipal wells has continually met state and federal drinking water standards. In the future, drinking water standards for groundwater supplies may change and result in the need for additional monitoring or treatment. To devise water treatment policies based on guesses about future water quality regulations would be too speculative, and therefore, appropriately not addressed in this EIR.
- B-3-7 Comment noted. The EIR was corrected as suggested.
- B-3-8 As described on page 13 of the report entitled, *City of Woodland Storm Drainage System Master Plan -- Phase 1*," prepared by Borcalli & Associates, August 11, 1995 (available for review at the City of Woodland Public Works Department, 300 First Street, in Woodland) and summarized in the Storm Drainage section of the EIR, the City, RD No. 2035, and the Department of Water Resources have reportedly agreed to study the scour problem associated with conveying runoff east across the Yolo Bypass. The proposed new channel discussed on in the drainage section of the EIR would be designed to reflect the findings of this study, and to avoid damage to RD No. 2035's facilities and the Shortline Railroad trestle. Therefore, the General Plan would not have a significant impact on this facility. This issue will appropriately be addressed in follow-up project-level environmental and engineering documents for construction of these facilities.
- B-3-9 Refer to the response to comment B-3-8. As described on page 13 of the report entitled, *City of Woodland Storm Drainage System Master Plan -- Phase 1*," prepared by Borcalli & Associates, August 11, 1995, the existing outfall channel would be improved. Figure 5-3 of the FEIR also indicates that the existing outfall channel will be improved.

The reported proposal by the Corps of Engineers and Department of Water Resources to install flap gates at the point where the low-flow channel meets the Yolo Bypass Levee would have to reflect the need for additional pumping capacity, as appropriate.

- B-3-10 The EIR was modified to state, "Most of this area is designated in the 100-year floodplain according to FEMA, and the potential for deep flooding increases with distance to the east."

The *Background Report* was revised to reflect the commentor's concern. Note that the *Background Report* does not imply that flood risks are limited to the lands located east of the city. Figure 4-7 and associated text description of the *Background Report* presents information with respect to flooding in the city.

- B-3-11 Neither the EIR nor the *Background Report* implies that there is a significant risk of the Yolo Bypass levee failure. The lands located to the east of the city could potentially be subject to deep flooding from overflows from the Willow Slough Bypass, Cache Creek, or the Yolo Bypass, depending upon the particular flood event or levee failure, and associated volume of overflow. The EIR was clarified to indicate that the Reclamation District contends that with ongoing maintenance, 100-year flood protection is provided.

Responses to Comments

B-4 Woodland Chamber of Commerce (November 2, 1995)

- B-4-1 The EIR does not conclude that County Road 25A is not needed to serve development projected under the General Plan through 2020. Not, however, that the I-5/SR 113 PSR is studying options that would use County Road 25A as one of the alternative connectors between I-5 and SR 113.
- B-4-2 Policy 3.A.7 and Implementation Program 3.2 call for development of the I-5/SR 113 connector.
- B-4-3 The EIR examines the mix of housing units based on current Housing Element objectives, and includes standards for law enforcement applicable to new development.
- B-4-4 Policy 1.J.2 calls for future study of development of Urban Reserve area east of County Road 102.
- B-4-5 Comment noted. These policies were expanded upon in the final General Plan.
- B-4-6 Economic and social concerns are not required to be addressed in an EIR. The Policy Document includes a chapter on economic development (Chapter 9).

C-1 Chrysalis Group (November 28, 1995)

C-1-1 The EIR concludes the configuration of this parcel, with urban development on two sides and a major roadway on the other, will create difficulty in continuing agricultural operations on this site. While buffering could still be accomplished, it would not change the overall configuration of the area. It is possible that farming can continue on this site, but the EIR takes the worst-case assumption that conflicts would arise even with policies of the plan. While there may be growth pressures for development of this parcel late in the planning period, the EIR does not assume that it would be developed.

C-1-2 The DEIR indicated that designation for urban use of the 160-acre parcel under Williamson Act contract in Alternative 2 would be more significant than designation of the smaller, 30-acre Williamson Act parcel in Alternative 1. It is true of the 160-acre parcel that although it is under Williamson Act, the soils are of lower quality than much of the other property in the Planning Area not under contract. Note that the Williamson Act analysis is separate from the analysis of prime agricultural lands. The EIR was revised to suggest possible mitigation for designating Williamson Act lands for development, thus leading to their nonrenewal or cancellation, could be application of Williamson Act contracts on lands elsewhere.

C-2 William Abbott & Associates (11/29/95)

- C-2-1 The EIR does compare the impacts of the proposed plan to the existing environment for all topics, including land use, public facilities and services, transportation, population and housing growth, noise, air quality, and recreational facilities. In the two topical areas of agricultural land and habitat, the DEIR did not fully consider the impacts of development within the city limits, primarily from continued buildout of the Southeast Area Specific Plan. The appropriate sections of the EIR were modified to reflect the losses from continued development within the city limits.

With respect to flooding impacts, based on FEMA's flood insurance rate maps (FIRM) for Woodland, the Southeast Area Specific Plan falls within Zone B, defined as between 100- and 500-year flood potential. Note that the property to which the commentor refers, between County Road 102 and the treatment plant, is in Zone B and C; development in these areas would indeed be subject to the same level of flood potential as within the Southeast Area Specific Plan area. Most of the territory within the Eastern Growth Alternative, including all land east of the treatment plant, falls within Zone A, 100-year flood potential. The City's standard for flood protection is identified as a 100-year level of protection. The EIR was revised to clarify the variance in flooding risks within the Eastern Growth Alternative. Also note that in addition to the adopted FIRM maps, the U.S. Army Corps of Engineers 1994 Cache Creek study indicated that areas north of Kentucky would experience higher levels of flooding than their previous categorization in Zone B; for this reason, the City redesignated this area.

- C-2-2 In *Al Larson Boat Shop, Inc. v. Board of Harbor Commissioners* (1993), the court ruled that "deferral of more detailed analysis to a project EIR is legitimate." It has been held that "where practical considerations prohibit devising such measures early in the planning process (e.g., at the general plan amendment or rezone stage), the agency can commit itself to eventually devising measures that will satisfy specific performance criteria articulated at the time of project approval. . . [Citation.]" (*Sacramento Old City Assn. v. City Council* (1991) 229 Cal.App.3d 1011, 1020 [280 Cal.Rptr. 478].) The *General Plan* specifically calls for specific plans for these areas to include measures for addressing conflicts with adjacent agricultural operations (See Policy 1.C.5). The precise measures that might be appropriate will depend on the configuration and specific land uses to be located in these adjacent areas. The agricultural land protection measures referenced in this comment refer to a study regarding methods of establishing a "permanent" urban limit line. The City will use this study in connection with Policy 1.A.11 and Implementation Program 1.1.

- C-2-3 As stated in response to comment A-1-1, intersection LOS analysis is not required in a general plan circulation element under *Government Code* Section 65302(b). Further, intersection analysis is not necessary to determine the likely impacts of projected growth on the roadway system. The planned roadway system is intended to accommodate projected traffic levels within the City's level of service standard (see level of service policy discussion in response A-1.1). Policy 3.A.2 establishes service level standards for the City's roadway system, including street segments and intersections. The specific process that will be used to ensure that adequate traffic operations are maintained throughout the city is spelled out in Policy 3.A.4, which requires an analysis of traffic effects from major development projects. Therefore, impacts to specific intersections and roadway segments will be identified and mitigated as development occurs, as has been the City's practice in the past, as evidenced by the commentor's example of specific development projects in Woodland that included this more detailed level of analysis.

Appendix D sets forth the technical assumptions that were used as inputs into the air quality model used as the basis for analyzing air quality impacts. The air quality model relied on average daily traffic volumes from the traffic model.

C-2-4 Refer to response A-1-1 regarding level of service policy change related to significance criteria.

Main Street and Gibson Road are included in the Yolo County CMP roadway network and have been assigned a level of service C threshold in the current CMP, since the current CMP is based on the City's standards in place when the plan was developed. Segments of both Main Street and Gibson Road may deteriorate below level of service C from development over the life of the updated General Plan. The current CMP threshold is based on the 1988 City of Woodland General Plan. The CMP is currently being updated, and the City has requested that the updated General Plan standards be included in the revised CMP.

In addition, it is not possible to determine if the potential level of service deterioration on Main Street and Gibson Road is in conflict with the CMP at this time for the following reasons:

- 1) CMP conformity is only measured biennially;
- 2) Measurement of level of service for CMP purposes requires that interregional trips be excluded from the analysis; and
- 3) The CMP has a seven-year planning horizon rather than the 25 years of the General Plan

During the CMP's biennial conformity analysis, interregional trips are excluded in the CMP's level of service measurement. The EIR analysis does not break out local versus interregional trips. Since the future levels of service reported in the EIR include a significant number of interregional trips on Main Street, it would not be appropriate to compare these levels of service with the CMP thresholds without removing deducting interregional trips. Given the difference in the time frames of the EIR versus CMP, it would not be appropriate to conduct such an analysis at this time. Policy 3.A.8 states the City's interest in continuing to participate in the countywide CMP. Accordingly, in the event that a future CMP conformity analysis does show a deficiency for these roadways within the time frame of the CMP, the City will participate in correcting the problem.

The EIR acknowledges future traffic studies, including the *Street Master Plan*, may in the future address some of the impacts identified as significant in the EIR, but categorizes the impacts based only on the roadway improvements identified in the EIR.

C-2-5 The commentator is incorrect in stating the plan policies do not support the conclusion that impacts on public services will be mitigated to a less-than-significant level. The plan places a high priority on attainment and maintenance of specified levels of services. Policies of the plan clearly address ongoing service levels in connection with new development. Note that Policy 1.C.5, under the requirements for new development within Planned Neighborhood areas calls for "implementation measures necessary to carry out the plan, including a program for financing public infrastructure improvements and a program for addressing any fiscal deficits to provide for adequate personnel and ongoing operations and maintenance." This policy would address funding for services for fire, police, parks, and libraries.

In addition, Policy 4.I.4 states that "The City shall require new development, as demonstrated through positive fiscal impacts or through specific funding mechanisms in the event of fiscal deficits, to fund fire protection personnel and operations and maintenance that, at a minimum,

maintain the above standards.” Policy 4.H.6 addresses the same requirement with respect to police service.

Policy 5.A.10 states that “The City shall ensure that appropriate funding mechanisms are identified to cover the cost of maintaining future parks and recreational facilities on an ongoing basis,” and further calls for preparation of a Parks Master Plan in Implementation Program 5.1 that would specify funding sources for the development and maintenance of parks and open space resources.

With respect to park facilities, the EIR does not specify the types of methods the City would use to achieve its park standards. The City has flexibility in how to best achieve those standards. The Quimby Act is only one method. Other methods could include development agreements, citywide assessments, bonds, land donations, private facilities, and joint use of school facilities. Many communities have higher standards than can be assessed using only the Quimby Act. It is appropriate local discretion to choose the park standard desired by the community. Secondly, neither the EIR nor the plan requires new development to fund existing deficiencies. The EIR acknowledges for informational purposes only what the existing deficiencies would be based on the updated park standards. Implementation Measure 5.1 requires development of a program to address any existing deficits. The acreage needed to meet new park acreage requirements for new development does not include any acreage needed to meet existing park deficiencies.

- C-2-6 Again, as in response to comment C-2-2, an agency can commit itself to eventually devising measures that will satisfy specific performance criteria. Policies of the General Plan commit the City to protecting the groundwater basin from overdraft by identifying the safe yield and developing a response plan if an imbalance between safe groundwater yield and projected water requirements are identified. This response plan could include conservation measures, reuse, surface water supplements, and other water management techniques, as appropriate. Prior to identification of safe yield, Policy 4.C.3 restricts new development to water usage levels that would result in no net cumulative increase in groundwater use in the Planning Area. Also note that policies were revised to clarify the studies of the groundwater basin and exploration of various water supply options that the City is currently investigating or intending to pursue (see Policy C.1.1.)

While it would not be possible or appropriate for the General Plan to specify the precise measures to be used over the 25-year time frame of the plan, if needed, conservation measures are available that could reduce water use in the Planning Area to levels needed to avoid a significant impact on the groundwater basin. There are many examples of the kinds of measures that have been or will be used in water planning in Woodland. The *Background Report* (see pages 4-2 and 4-3) identifies conservation measures that the City is already implementing. The plan requires additional efforts as stated in Policy 4.C.4. These conservation practices reflect groupings of generally accepted Best Management Practices (BMPs) identified in the 1991 Memorandum of Understanding Regarding Urban Water Conservation in California (commonly referred to as the statewide BMP MOU), which result in more efficient use of water. The specific conservation practices, including retrofitting existing development with water conserving devices, will be further defined in the City’s updated Urban Water Management Plan anticipated for release in Spring of 1996. They will provide the following activities:

- Provide plumbing kits for existing and new water users (e.g., shower flow and toilet devices)
- Require water conserving design and equipment in new construction
- Conduct large landscape water audits and incentives

- Implement landscape water conservation requirements for non single-family residential uses
- Implement landscape water conservation requirements for single family homes
- Conduct more extensive public information effort
- Conduct commercial and industrial water conservation audits and incentives for top water users
- Identify improved efficiencies of new commercial and water users
- Implement conservation-based pricing
- Provide financial incentives for conservation

Conservation savings that may be realized are difficult to quantify since they depend on the extent of implementation but could range from 5 to 25 percent of total water usage. For example, according to the BMP MOU, requiring landscape water conservation for new irrigation usage (non-single family homes) may result in a 20 percent reduction of irrigation usage. A landscape audit for these same existing users with three acres or more may result in a savings of 15 percent of current irrigation requirements. In addition, Policy 4.C.9 regarding reduction of unaccounted water losses through a leak detection and repair program could result in about 10 percent savings of total production estimates.

If identified as a necessary component of the response plan in Policy 4.C.2, retrofitting all existing development over the next 25 years is not an unworkable strategy. This could be accomplished in many ways: 1) by requiring retrofits upon major remodels or change of ownership; 2) mandatory retrofitting of existing development with water meters; or retrofitting existing development as a required mitigation for new development to offset water use. The most appropriate measures will be determined based on the conclusions from studies in Policy 4.C.1. Retrofitting existing development, in combination with the other strategies called for in the plan, is one possible workable strategy to reduce the impacts on groundwater, along with the other strategies to be investigated pursuant to Policy 4.C.1. Furthermore, contrary to the commentator's assertion, retrofitting all existing development is certainly not unprecedented. The City of Davis is currently retrofitting all existing residential units with meters, with the costs paid for through monthly water fees.

- C-2-7 While the General Plan does promote development of a golf course, it does not designate a site and no specific development is planned at this time. The exchange of planned residential or industrial land use with a golf course may result in an increase in water demands for the site. However, golf courses are easily suited to using alternative water supplies such as untreated surface water, reclaimed municipal wastewater, or industrial wastewater. Therefore, if deemed necessary during the project development and approval stages, alternative supplies could be required to augment a groundwater supply. In addition, recent designs of golf course in water-conserving areas include elements such as drought-resistant grasses in non-play areas, thus reducing water requirements. Any future golf course that is proposed would require environmental review that would presumably address impacts on water use.
- C-3-8 Subsidence is addressed in response to comment B-3-4.
- C-3-9 Comment noted. Policy 4.C.1 regarding investigation of surface water supplies for domestic and/or agricultural use was modified to include investigation of water management programs such as conjunctive use and recharge programs.

- C-2-10 The EIR acknowledges that projected growth will require expansion of the treatment plant and describes three alternative methods of providing the additional capacity that the City is examining. Unlike the circumstances in *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994), 27Cal4th713, the General Plan EIR provides the public and decision makers with information concerning a wastewater treatment plant expansion and provides an analysis of possible significant environmental impacts from an expansion. Contrary to *San Joaquin Raptor*, this EIR is a tiered EIR on a General Plan update, not a project EIR. A tiered EIR anticipates that additional environmental review will occur on specific projects. The General Plan and EIR include policies that establish the standards for any wastewater treatment plant expansion, thus providing adequate mitigation at the General Plan or first-tier stage.

The existing land site has the capacity to accommodate expansion needed to serve project development under the General Plan. The *Wastewater Master Plan*, however, will also examine the alternative of a new regional facility since this alternative has been raised in public comment. For the purposes of this EIR, however, it is assumed that the wastewater treatment plant will be expanded at its current site. Expansion of the wastewater treatment plant will be subject to General Plan policies for environmental protection, as well as state and federal laws and permits that address environmental protection.

For informational purposes, the potential impacts of the three wastewater treatment alternatives to be examined in the *Wastewater Treatment Master Plan* are described in general below. Implementation of any of the three alternatives would require the City to do a project-specific EIR which would assess impacts in detail.

Alternative A - Expanded Woodland Facility with Continued Discharge to the Tule Canal: Expansion of the existing facility would result in a greater quantity of wastewater discharged at the Tule Canal, with potentially higher water quality impacts. Any increases would be required to meet state discharge requirements. Overall odor emissions could increase with increased quantities of wastewater treated. If significant, these emissions could be reduced through plant improvements and /or increased levels of treatment and/or odor control. Some increase in noise, light, and vehicle traffic might result from plant expansion; if significant, these would require mitigation consistent with General Plan policy.

Alternative B - Expanded Woodland Facility With Disposal of Reclaimed Water on Agricultural Lands in the Woodland Area: The impacts of this alternative would be similar to Alternative A, except that impacts on receiving water (Tule Canal) would be replaced by impacts associated with reclamation on agricultural lands, including groundwater, replacement of existing agricultural water, and surface runoff from agricultural sites. These impacts could be reduced through proper design and operation of the agricultural sites and additional treatment at the treatment facility.

Alternative C - Regional Facility Serving Davis and Woodland: Again, this alternative is not assumed for the purposes of this EIR. The level of impacts would be greater than Alternative A, and would depend on the location of the new facility.

- C-2-11 The EIR was revised to clarify the issue with respect to toxic gases. Pursuant to Policy 4.D.7 and Implementation Program 4.6, the City will address health and safety risks associated with the present use of chlorine gas at the plant. In addition, any expansion of the plant would be required to examine this issue. The specific mitigation techniques will be further identified in connection

with the *Wastewater Master Plan* and plans for ultimately expanding the plant. The EIR was revised to clarify that expansion of the plant would have less-than-significant impacts.

- C-2-12 The EIR assumes that 100 percent of habitat areas designated for new development will be lost. Policies of the plan would mitigate the impacts of such loss at a project level. The EIR concludes, however, that cumulative impacts on habitat are potentially significant. While the EIR notes that mitigation of this impact could be accomplished through local participation in a regional habitat conservation plan, it concludes that habitat loss is an unmitigated impact of the plan, since the EIR cannot assume adoption of the HCP since this is a future action.

The commentator is incorrect in the statement that no alternative mitigation measures other than the HCP are identified. Policies 7.B.2 through 7.B.9 and 7.C.2 through 7.C.11 provide mitigation for habitat loss; but the cumulative impacts remain significant. Note that in the experience of Mintier & Associates, the City's General Plan and EIR consultants, in cases where cumulative habitat impacts are an issue, state and federal wildlife agencies usually promote the development of regional habitat conservation plans as the most effective way to address these issues. See comment letter on this EIR from the California Department of Fish and Game (letter B-3) supporting the City's continued participation in these efforts.

As an informational document, it is certainly useful for the EIR to note that such an HCP for Yolo County is under preparation, is currently undergoing public review, and is scheduled for adoption in 1996. The EIR concludes, however, that adoption of the Yolo County Habitat Conservation Plan cannot be guaranteed by the City of Woodland, since it is a future action and requires adoption by the Yolo County and the other cities in the county.

The *Draft Habitat Conservation Plan* (January 1996) can be found on the General Plan reference shelf at the City of Woodland Community Development Department, 300 First Street in Woodland, and is also available for review and purchase from the City and Yolo County.

- C-2-13 As described in the EIR, development under the General Plan would increase storm runoff, but policies and programs of the General Plan provide for planning, designing, financing, and constructing storm drainage facilities necessary to accommodate the increases in runoff.

Drainage from the City is pumped into the outfall channel that discharges into the Yolo Bypass. The City will increase pumping capacity to accommodate increased runoff from new development. The increase in pumping capacity would result in a corresponding increase in flows reaching the Yolo Bypass.

The impact of increased pumping capacity on the Yolo Bypass is less than significant based upon information contained in the report entitled, *Reconnaissance Report, Westside Tributaries to the Yolo Bypass, California*, prepared by the U. S. Army Corps of Engineers (Corps of Engineers), June 1994. This report states that initial studies have found that increasing discharges from Cache Creek to the Yolo Bypass, from 30,000 to 64,000 cfs, would have insignificant impacts on the Yolo Bypass due to differences in the timing of the peak flows between Cache Creek and the Yolo Bypass. This same difference in the timing of peak flows would apply to the Woodland area. See also comment C-2-10 regarding *San Joaquin Raptor v. County of Stanislaus*.

- C-2-14 Comment noted. Policy 8.B.4 was modified to require the storage of hazardous materials and wastes within floodplain areas to be protected from potential leaks or spills related to flooding.

C-2-15 Upon further review of this issue, the areas where increased traffic noise would have exceeded EIR thresholds of significance were identified as industrial, commercial, or undeveloped areas or in areas with sound walls that would mitigate this impact. See revised noise analysis in FEIR, Volume 1. This impact was therefore identified as less-than-significant. Further, note that these increases were generally along major arterials and freeways.

C-2-16 Section 15126 (d) of the *CEQA Guidelines* require “. . . a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project.” The EIR appropriately set forth a range of alternatives for accommodating long-term growth in Woodland. The five alternatives include the Eastern Growth Alternative, which includes the property to which the commentor refers, located between County Road 102 and the domestic wastewater treatment plant. Development of this property alone would not attain the long-term growth projections of the city. The goal of the General Plan process was precisely to avoid this kind of piecemeal planning and to look at the cumulative implications of various growth alternatives. Development of this area was related to considerations of growth to the east.

Constraints to development specifically of the property between CR102 and the treatment plant include the appropriateness of residential development adjacent to an existing industrial use (the wastewater treatment plant), safety issues regarding pedestrian crossing of future six-lane County Road 102 to services and schools to the west, and the location of habitat for threatened and endangered species. Other constraints of land within the Eastern Growth Alternative include 100-year flooding potential east of the treatment plant, separation of development east of the domestic treatment plant from the rest of the community, and the economic feasibility of conversion of the City-owned industrial wastewater treatment facility. Further analysis would be required to determine whether the sale of the property would require repayment of the federal government as lending agency based on the federal grant to develop the site. Notwithstanding PG&E Properties' contentions, it appears that study of legal and regulatory requirements would be required to settle this issue to address all issues related to economic feasibility of relocating this facility. These various constraints to eastern growth are not artificial but are well-documented and well-reasoned issues for consideration of the appropriateness of future development.

While the DEIR raised the question of the Williamson Act status of the site of the industrial wastewater treatment facility as it might affect the timing of development to the east, further research has determined that the property should not revert to Williamson Act if removed from public use. The EIR was revised accordingly.

C-2-17 See response to comment C-3-4 regarding relocation of the wastewater treatment plant and response to comment C-3-78 regarding issues of travel to Sacramento. Development within the Southeast Area will likely be more dependent on Sacramento for services and employment than in other areas of Woodland further to the north and west. This was reflected in the traffic and air quality analyses of the project.

C-2-18 The discussion of the Eastern Growth Alternative was modified to reflect that buffering would be required and presumably, could occur. Rice farming tends to be more incompatible with residential development than the row crops and orchards located south of the city. The standing water, associated herbicide use, pests, and subsequent burning of rice straw are intensive uses and the EIR concludes that these activities would be more difficult to buffer for residential

development. Nevertheless, consistent with the policies of the plan, new development could be required to do so.

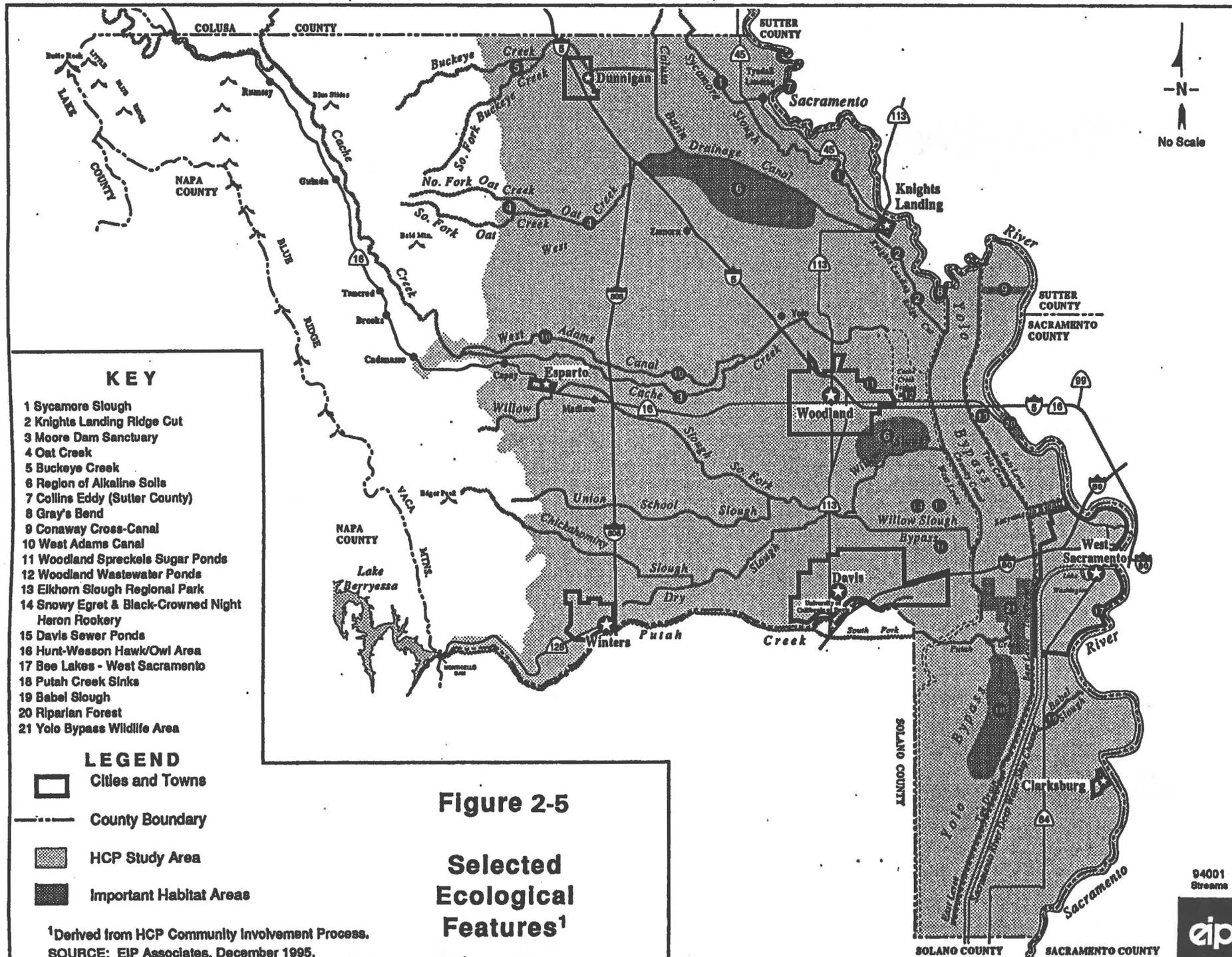
C-2-19 The statement that a new interchange would probably be required to serve the Eastern Growth Alternative is a realistic expectation given that substantial capacity will not be available at the County Road 102 interchange. Therefore, given the costs associated with development of a new interchange, it is reasonable to assume that the total transportation cost associated with developing this area is greater than that for DEIR Alternatives 1 and 2. Note that this was not identified as a significant impact for the Eastern Growth Alternative, but was merely discussed for informational purposes.

C-2-20 Water tables in the Eastern Growth Area are known to be high. The City has experienced high water tables in the easternmost part of the Southeast Area Specific Plan, and PG&E Properties contends in their comment letter on this EIR (C-3) that groundwater in this area is within 5 to 15 feet of surface. From City experience, it is more expensive to install and maintain underground utilities under these conditions. This is not, however, found to be a significant impact of the Eastern Growth Alternative; it is only discussed for information purposes.

The EIR concludes that development to the south will convert agricultural lands, resulting in groundwater used previously by agricultural lands to be converted to urban use. Policy 4.C.1 calls for further investigation of the groundwater aquifer to determine its safe yield and Implementation Program 4.5 calls for development of a groundwater model. Without such information, there is not adequate information to determine if pumping water from the east would have less of an effect on the aquifer than pumping water from the south.

C-2-21 Figure 8-1 in the EIR, along with detailed habitat mapping available for review at the Yolo County Planning Department, 292 Beamer Street in Woodland, show the locations of wetlands, including alkaline sinks and vernal pools, within the area encompassed by the Eastern Growth Alternative. As summarized in Chapter 8 of the EIR, and described in the *Yolo County Draft Habitat Conservation Plan* (January 1996), the wetlands habitat located in the Eastern Growth Area are among the scarcest in the county and support the highest concentrations of state and federally endangered, threatened, and candidate species. According to the *Draft HCP*, of the 465,908 acres in the study area in the county, wetland habitat comprises 4 percent or approximately 18,992 acres. The alkaline sinks subtype, which constitutes significant land within the Eastern Growth Alternative, is specifically identified in the *Draft HCP* as a special habitat area (see attached Figure 2-5 of the *Draft HCP*). The *Draft HCP* describes it as a “regionally scarce habitat type” and “critical to certain HCP species.” Of the five habitat types described in the *Draft HCP* and this EIR, the *Draft HCP* concludes that wetland habitats support in one way or another, 23, or 79 percent, of the 29 target species. In comparison, the agricultural habitat predominant in the southern growth alternatives, comprises 82 percent (380,942 acres) of the study area in the county, and provides benefits to 11, or 37 percent, of the target species.

The EIR appropriately discusses the higher value and regional scarcity of habitat within the Eastern Growth Alternative. EIP Associates, preparers of the *Draft HCP*, acknowledge that although theoretically possible, it would be very difficult to mitigate substantial loss of this habitat, requiring identification of areas elsewhere in the county with alkaline soils where species could be introduced. Nevertheless, because of the policies in the General Plan, the EIR concludes that this habitat loss could be mitigated at a project level, although like the southern growth alternatives, the cumulative loss would be potentially significant without adoption of the HCP.



C-2-22 The City selected two preferred alternatives for analysis in the DEIR prior to its preparation, but did not tentatively select one preferred alternative until after the Draft General Plan and Draft EIR had undergone public review. Issues related to the rate at which the land designated for development occur do not fundamentally change the ultimate impacts of such development. After development of all land within the city limits, new residential development will be subject to specific plans, which certainly affords the City the opportunity to phase new development, and the impacts of any phasing would be examined in future environmental analysis of such specific plans.

The EIR assumed a reasonable worst-case analysis of impacts, with densities based on Housing Element objectives. Discussions of reducing the ratio of multi-family housing to a lower proportion would result in lower densities, rather than higher, with lower levels of impact on services.

The range of alternatives considered in the EIR is an appropriate range for a general plan. As summarized in Table 10-1, the total acreage of development varies greatly, as does the population holding capacity, and the associated impacts. The commentor is incorrect in stating the No Project - No Development Alternative and the No Project - 1988 General Plan are essentially the same. The No Project - 1988 General Plan Alternative would accommodate 17,000 more people, plus substantial additional commercial and industrial development, with associated impacts, compared with no new development under the No Project - No Development Alternative. The Eastern Growth Alternative is identified as an alternative for accommodating projected future development with fewer impacts on prime agricultural lands. The EIR provided a choice among five alternatives. As an alternative to growth on prime agricultural lands, the EIR provided alternatives for accommodating less growth with less conversion of agricultural land, or accommodating future development to the east and reducing impacts on prime agricultural land. Based on an analysis of the issues, the FEIR identifies the Eastern Growth Alternative as environmentally superior to the southern growth alternatives. See alternatives discussion in FEIR text (Chapter 10).

C-2-23 The EIR was revised to clarify this issue.

C-2-24 The summary of the EIR was revised to fully address these issues.

C-2-25 See response to comment C-3-15. The appendices were included as information supporting the General Plan. The density assumptions in Table 2 of Appendix A were used as assumptions for the residential absorption study. These are not directly related to the land use designations, but include subcategories of housing types within land use designations (e.g, small lot, standard lot, and large lot could all be found in the Low Density Residential land use designation).

C-3 PG&E Properties (11/29/95)

- C-3-1 Contrary to the commentor's assertion, the EIR provides a thorough and objective analysis of facts. The EIR relies on numerous studies and information prepared by state, federal, and local agencies, plus additional analysis conducted by specialists in the various technical fields.

As with all information submitted in response to the Notice of Preparation, the information submitted by the Conaway Conservancy was reviewed by City staff and Consultants. Note that all responses to the Notice of Preparation can be reviewed at the City of Woodland Community Development Department, 300 First Street in Woodland (General Plan reference shelf). The information submitted by Conaway addresses issues related to development of 3,000 acres between the wastewater treatment plant and the Yolo Bypass. This, when added to the land between the existing city limits and the wastewater treatment plant, accounts for more land than the City is considering for development through 2020 and includes more land than included in the Eastern Growth Alternative assessed in the EIR. If the EIR were to assess this alternative, it would include a higher level of impacts than the Eastern Growth Alternative because it would include more land and would presumably, have a higher holding capacity. The City is not obligated to conduct an environmental analysis of any territory that a property owner proposes for development; instead as required by CEQA, the EIR analyzed a reasonable range of alternatives to meet projected growth.

In addition, the EIR is not required to critique and evaluate the technical viability of the information submitted by Conaway, particularly as much of this material suggests the undertaking of major public works projects which might have substantial environmental impacts. The information submitted by Conaway, plus existing information and additional studies, would be required to fully address the issues related to growth to the east and whether the City should consider any development to the east. For this reason, among others, the City selected a growth pattern that best met its project objectives, and has chosen to conduct a separate study of issues related to growth to the east to determine if the City should consider growth in this area in the future (see Policy 1.J.2).

The FEIR identifies the Eastern Growth Alternative as environmentally superior to southern growth alternatives.

- C-3-2 The commentor is correct. Based on the case cited, the EIR should be more appropriately entitled a first-tier EIR rather than a program EIR. This name change does not, however, change the format of this EIR or the manner in which it will be used.
- C-3-3 The statement in the DEIR included in Section 1.4, the General Plan Preparation Process, was used to explain the process of updating the general plan, including the actions that had taken place up to the point of preparing the *Draft General Plan* and Draft EIR, and the likely course of events for public review of the draft documents and adoption of the updated plan. Since the City Council identified the two southern growth alternatives as its "preferred alternatives," it was assumed that one of these would be the most likely alternative to be selected by the City. Of course, the City Council considered other alternatives to the project, both in the process of selection of the preferred alternatives to be analyzed in the DEIR and during the public review process of the *Draft General Plan* and Draft EIR. The Final EIR includes an assessment of the environmental impacts of the preferred land use alternative selected by the Council.

- C-3-4 CH2M Hill, the City's wastewater consultants, estimate that the costs for abandoning the existing treatment plant and participating in a regional treatment plant with the City of Davis would be in the order-of-magnitude of \$70 million. (This is an estimate of capital costs plus engineering, legal, administration, and contingency costs.) If Woodland were to develop its own wastewater treatment plant at a different location, rather than participating in a joint plant, the capital costs would be expected to be similar to this amount, if not greater. (For reference of cost estimates, see CH2M Hill memorandum to City of Woodland dated October 12, 1995, on file at the Woodland Community Development Department, 300 First Street (General Plan reference shelf). This estimate does not include costs for remediating the existing site nor any revenues from the sale of land where the treatment plant is currently located. It was concluded that estimating the value of the land where the plant is currently located would be too speculative, without any information about the extent to which the site would be need to be cleaned up or the holding costs of the land. Furthermore, the City developed some portions of the plant with federal and state grants, and it is uncertain whether any profits from the land, if there were any, would revert to the state and federal governments as lending agencies.

The \$70 million is roughly seven times greater than the estimated cost to expand the existing treatment plant to serve projected future development under the General Plan. This cost would need to be borne by existing ratepayers or solely by new development. Clearly, this is beyond the typical costs borne by new development. Further, requiring new development to pay the cost of relocation of the plant would make it difficult or impossible to pay for mitigation of other impacts such as flood control improvements, habitat mitigation, and school construction. In addition, if the City found that new development could bear this level of cost for mitigating impacts, it would appear that these funds could mitigate the loss of more agricultural land than relocation of the treatment plant would permit, through extensive purchase of conservation easements in critical areas of the county.

In addition, while the City certainly considered cost an issue in whether it would consider relocating the wastewater treatment facility, there are other reasons that the City chose not to consider relocation of the treatment plant as part of this project. The treatment plant is an operating public facility, is a viable long-term use for the site, and has potential for expansion at this site. There is no requirement that the City consider the viability of the demolition and relocation of an existing use as a mitigation measure, any more than the City would be required to consider demolition and relocation of City Hall to reduce traffic impacts on Main Street.

- C-3-5 An overview of recent flood protection investigations conducted by the Corps of Engineers is provided in the "Flooding" section of Chapter 4 of the *Background Report*. Policy 8.B.6 requires the City to continue to work toward defining existing and potential flood problems and solutions.

Based on the March 1994 U.S. Army Corps of Engineers *Westside Tributaries Study* (on file at the Community Development Department General Plan reference shelf) which indicated the areas in and around the city that would be subject to flooding from Cache Creek, the City reconsidered areas designated in its General Plan for residential development. As a result, it chose to redesignate approximately 400 acres north of Kentucky Avenue for nonresidential development. It was this decision that led the City to look at expanding its Urban Limit Line since it could no longer accommodate long-term projected population growth within the existing Urban Limit Line without the area north of Kentucky.

It is true that flood control improvements to Cache Creek could also mitigate the flooding hazards in this area; this would be a multi-agency regional effort. While the City is participating in such studies to address flood hazards to existing development, flood control improvements are usually very costly and take time to implement, as is seen by recent experiences in Sacramento. While Conaway suggested some flood control improvements that it contends would allow development of its property, flooding from Cache Creek is a larger issue that should be addressed comprehensively, rather than on a piecemeal basis. Therefore, the General Plan and EIR chose to avoid designating additional residential development within the floodplain as the most prudent and concrete method to mitigate flood hazards.

- C-3-6 The commentator appears to cite only one page of the DEIR in the contention of lack of information. Constraints to growth on the north, west, and east are summarized in Section 1.5, Woodland General Plan Context, in Chapter 1, Project Description and Impact Summary, and are also described at length in Chapter 10, Mandatory CEQA Sections, in Section 10.3, Selection of General Plan Alternatives. These constraints are summarized below.

Physical constraints to the west include prime agricultural lands and lands in Williamson Act contract west of CR 98, and because the City's wastewater collection system cannot serve this area because of the gravity system and capacity of its trunk lines. Maps of Williamson Act contract lands are available at the County Planning Department, 292 Beamer Street in Woodland; the City's wastewater treatment system is described in Chapter 4 of the *Background Report*.

Physical constraints to the north include flooding and prime agricultural lands. The area north of the existing Urban Limit Line was ruled out as a feasible alternative as this land is Class I prime farmland and, according to the U.S. Army Corps of Engineers' *Westside Tributaries Study* (March 1994), Cache Creek poses a flood threat to this area. The area north of Kentucky Avenue designated for residential uses in the *1988 General Plan* was reevaluated, with the conclusion that it was not the appropriate location for future residential growth because flood studies indicated that this area would be subject to flooding from Cache Creek. Therefore, lands north of Kentucky Avenue between the Southern Pacific Railroad Main Line and Road 98B were redesignated for industrial and commercial service uses. See appropriate sections of the *Background Report* for information on soils and flooding.

Constraints to the east include flooding, location of existing land uses, and urban form. Most of this area east of the treatment plant is designated in the 100-year floodplain according to floodplain maps adopted by the Federal Emergency Management Agency. The City's wastewater treatment facilities also raise concerns for the compatibility of development with these facilities and the function of the domestic treatment plant as a barrier. Substantial development east of the domestic treatment plant could not occur in a logical pattern without relocation of the industrial wastewater facility. Developing to the east would require extending future development around and beyond the domestic wastewater treatment plant, creating a discontinuous development pattern and an isolated enclave separate from the existing community. This would create a discontinuous urban form, with development east of the domestic treatment plant more distant from citywide public facilities and services.

Various forms of habitat are a constraint for all directions of growth, although the habitats with the highest concentrations of target species are located to the east. See *Background Report* and *Draft Yolo County Habitat Conservation Plan* (January 1996) (on file at the City of Woodland Community Development Department, 300 First Street (General Plan reference shelf)).

C-3-7 The page to which the commentor refers is in a section entitled “Summary of General Plan.” For ease of use, the City will ultimately publish all elements of its General Plan under one cover. As noted throughout the *Draft General Plan* and Draft EIR, however, the *Housing Element* was not updated as part of this project. To avoid giving reviewers the erroneous impression that an update of the *Housing Element* was part of this process, it was not reproduced in the *Draft General Plan* but instead a placeholder was included to reserve space for the *Housing Element* to be published as part of the adopted document. Readers of the *Draft General Plan* with an interest in housing issues were notified that the *Housing Element* was currently available under separate cover for their information.

The comment appears to erroneously conclude that the EIR intended to incorporate the *Housing Element* by reference. This is not the case. The references to the *Housing Element* cited by the commentor explains that the *Housing Element* is not a part of this project and therefore not incorporated by reference. To the extent that the *Housing Element* is discussed in other sections of the EIR to provide readers with an understanding of its relationship as part of the General Plan and in those sections where the EIR assesses its consistency with the updated *General Plan*, the pertinent sections of the *Housing Element* are summarized. The citation of the *State CEQA Guidelines* (Section 15150(d)) referenced by the commentor refers to a requirement for citing state identification numbers of other environmental documents when incorporated by reference. This is not appropriate since the *Housing Element* is not an environmental document, and therefore does not have the state identification number to which the *Guidelines* refer.

C-3-8 In the “Summary of the General Plan” section, the topical headings discussed in Chapter 7 of the *Draft Policy Document* were inadvertently omitted. These were added to the Final EIR and are:

- Water Resources
- Fish and Wildlife Habitat
- Vegetation
- Open Space for the Preservation of Natural Resources
- Air Quality--General
- Air Quality--Transportation

C-3-9 The Project Alternatives section is adequate and meets the requirements of CEQA. Responses to specific comments on the alternatives are included in subsequent comments.

C-3-10 Section 1.10, Impact Summary, was expanded in the FEIR to fully describe those items required by Section 15123 of the *CEQA Guidelines*. The DEIR evaluated all of the alternatives and gave each alternative serious consideration. The impacts of each alternative and feasible mitigation measures were fully disclosed to permit and facilitate fully informed decisions by the Planning Commission and City Council.

C-3-11 Section 1.10, the section of the DEIR to which the commentor refers, discusses the significant impacts of the two preferred alternatives. The EIR identifies four other alternatives that lessen the impact on agricultural lands, as described in Chapter 10, under the “Significant Impacts of Alternatives” section (following Table 10-1). These alternatives are also listed in the revised summary section of the FEIR.

C-3-12 The section to which the commentor refers to is a summary that addresses the issue of conflicts with surrounding agricultural operations (the full discussion of this issue is included in Chapter 1 of the

EIR). This discussion specifically refers to whether the land use pattern would create conflicts with surrounding agricultural operations. It was concluded that while urban development adjacent to agricultural operations can create conflicts, this could be mitigated through buffering or other means, as required for subsequent specific plans for these areas prior to approval of development. The EIR did conclude, however, that DEIR Alternative 2 did create an agriculturally-designated parcel that would be surrounded on two sides by urban development and on a third by a major urban roadway, which would potentially cause problems for agricultural operations in that area that could not be mitigated through buffering.

The issue of growth inducement onto adjacent lands is another issue that is addressed separately in Chapter 10, Section 10.6, Growth Inducing Impacts, and is discussed in the alternatives analysis. This section concludes that both alternatives are in fact, growth inducing, and was amended in the FEIR to clarify that the *General Plan* is growth-inducing to prime agricultural lands.

C-3-13 This comment merely references subsequent comments.

C-3-14 This comment merely references subsequent comments.

C-3-15 The EIR does use assumptions concerning the likely average density of new development and these densities reflect an important consideration in assessing impacts. The density ranges of the land use designations were devised to accommodate the various kinds of development that are included in the definitions. The maximums identified reflect the absolute maximum that would be permitted, usually in atypical circumstances (i.e., granting of density bonuses). Development at these maximums is unusual, however, and it would be misleading to assume that *all* land would develop at *maximum* densities. This would result in an assumption of a higher population and/or employment in a given area than would likely occur. This assumption would in turn lead to an oversizing of infrastructure (e.g., roadway widths, sewer trunk lines). When actual development occurred at lower densities, the per-unit costs would be higher or infrastructure would be underfunded. Therefore, this EIR uses densities that reflect historic averages to serve as a useful tool in planning for growth and necessary infrastructure.

The averages used in this DEIR were derived through discussions with City staff, Mintier & Associates, and David Taussig & Associates, the City's economic consultants. Mintier & Associates and David Taussig & Associates are familiar with the typical densities seen throughout the Sacramento region and the Central Valley. In addition, City staff reviewed historic and recent development to determine typical densities for development within these land use designations in the city. David Taussig & Associates provided input for typical densities for land use designations (e.g. Very Low Density Residential, Business Park) that are not widely used currently in Woodland but that the City intends to pursue.

Additional environmental analysis (e.g., for specific plans and development projects) will also identify infrastructure requirements. The City will continue to monitor development and, if necessary, can respond to any unexpected changes in development densities through changes in zoning or revised infrastructure planning if warranted. Supplemental/second-tier environmental review would be required if densities are deviated significantly from the assumptions.

C-3-16 The EIR appropriately evaluates the impacts of development of the land designated within the Urban Limit Line to assess the infrastructure, public facility, and environmental impacts of development of this territory. Since the General Plan covers a 25-year time frame, it appears that land availability

would not likely be a constraint for at least 10 to 15 years. This General Plan does not preclude future consideration of expansion of the Urban Limit Line in subsequent General Plan updates if this is needed to provide additional land. In fact, Policy 10.A.3 calls for a major review of the plan every five years. In addition, in connection with the mandatory *Housing Element* update, the City is required to consider constraints on the production of housing. If land availability becomes a significant constraint at some point in the future, there are adequate opportunities for addressing such issues. Further, housing affordability is not an issue that would be considered a significant impact on the environment based on CEQA.

C-3-17 The EIR projects residential and nonresidential growth through the year 2020 and links that growth to the improvements needed by 2020 to serve that growth and the likely impacts of such development. The holding capacity of the Land Use Diagram does include more nonresidential land than is projected for development by 2020. Presumably, at some point in the future, the City will also designate additional land for residential land to accommodate growth after 2020. Where such development might take place, however, is unknown and to make an estimate of where it might occur would be extremely speculative. Consistent with Section 15145 of the *CEQA Guidelines* which states that "if, after thorough investigation, a Lead Agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact," the EIR concludes that evaluating the impacts of development substantially beyond 2020 would be far too speculative, given the uncertainty regarding trends that might affect growth 20 and 30 years hence and uncertainty of technological advances that may take place beyond 2020.

To effectively plan for and fund infrastructure and other improvements, the *General Plan* chooses a time frame (i.e., 25 years) for which projections can be made with some level of certainty and where growth projections, infrastructure, and impacts are linked within a reasonable period for long-term planning.

As a first-tier EIR, future development proposals will be assessed against the assumptions in this EIR. If nonresidential development were to occur to a greater extent than assumed in this EIR, additional environmental analysis would be required before approval and annexation of lands.

C-3-18 See response to comment C-3-15. The EIR clearly identifies the thresholds of significance it uses as the basis of the analysis for each topical heading within each chapter. Section 15064 (b) of the *CEQA Guidelines* states that "the determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible on scientific and factual data. An ironclad definition of a significant effect is not possible because the significance of an activity may vary with the setting." While Appendix G of the *CEQA Guidelines* provides examples of significant impacts, there are only four conditions under which a lead agency must make a mandatory finding of significance (*CEQA Guidelines* Section 15065).

In order to identify the appropriate thresholds of significance for this project, the EIR preparers reviewed all the items suggested in Appendix G of the *CEQA Guidelines*. Those that were appropriate for the conditions in Woodland and for a general plan update EIR were included in the EIR and are referenced in the appropriate topical heading within each chapter. In addition, the EIR includes many others that were specifically suited to the local conditions and this project. Other than suggesting that the EIR include the entire list without consideration of their suitability for this project, the commentor does not state any specific thresholds that were not included that the commentor believed should have been. Further, the commentor appears to imply that all the items

listed in Appendix G should be listed as thresholds of significance in the section on “Urban Land Use and Land Use Plans” in Chapter 3, Land Use, Housing, and Population. Since most of the items in Appendix G do not address the topic of the chapter, this would clearly be inappropriate.

- C-3-19 For the purposes of analysis, the EIR makes general assumptions regarding the composition of uses in those areas designated Planned Neighborhood (PN), based on the guidelines set out in Policy 1.C.5. The mix assumed in the EIR is based on those guidelines and current Housing Element objectives. As provided for in the General Plan, the precise location and mix will be based on the specific plans for the area, which must comply with the guidelines in Policy 1.C.5. As a first-tier EIR, future plans and development proposals will be assessed against the assumptions in this EIR. If the mix were to be substantially different than assumed in this EIR, additional environmental analysis would be required to address any changes in impacts.
- C-3-20 Comment noted. See response to C-3-15. In addition, Policy 1.C.5(k) requires new residential specific plans to manage residential growth consistent with the General Plan’s population projections.
- C-3-21 The meaning of “urban reserve” is clearly defined in the General Plan and EIR. Urban reserves are lands that may be considered for future development after further study and analysis, but are not considered for development as part of the general plan or general plan EIR. The EIR further defines urban reserve on page 1-12 in Chapter 1. As stated in Chapter 2, the EIR analyses land within the Urban Limit Line, and Table 2-2 explicitly states that no new development of lands designated as Urban Reserve is assumed within the time frame of the General Plan.

Specifically, as it relates the designation used in the General Plan, Urban Reserve is defined as follows:

This designation is applied to land outside the Urban Limit Line within the Planning Area, which may be considered for future development with urban uses. No urban development may occur on lands designated Urban Reserve before the General Plan is amended to specify a primary land use designation for the property. Until the General Plan is amended, allowable uses shall include wastewater treatment facilities and other uses specified under the Agriculture (A) and Open Space (OS) designations.

- C-3-22 The discussion of the *Yolo County General Plan* was summarized in the *Background Report* and EIR. The Plan is also available for review at the City of Woodland Community Development Department, 300 First Street in Woodland (General Plan reference shelf).

The *Yolo County General Plan* seeks to direct urban development to the cities and existing communities. It does not, however, preclude existing cities from making decisions over future expansion. Since the precise boundaries within the *Yolo County General Plan* are based upon Woodland’s *1988 General Plan*, the land use boundaries of the updated *Woodland General Plan* differ from those shown in the *Yolo County General Plan* in the same way that the updated *Woodland General Plan* has different boundaries than those in Woodland’s *1988 General Plan*. This would be true for any alternative selected by the City that expands its Urban Limit Line. The updated *Woodland General Plan* does not, however, run counter to the overall goals and philosophy of the *County General Plan*, indicated by the minimal revisions that would be needed to the City-County Urban Development Agreement. A change in boundary itself is not a significant impact.

The issue is the impacts on prime agricultural land, which are identified elsewhere in the plan as significant and unavoidable.

The City sent copies of the Draft General Plan and Draft EIR to the County for their review as part of the normal review process, but received no comments from the County on either document.

C-3-23 The EIR assesses the impacts of any development under the *General Plan* on the environment as defined in Section 15360 of the *CEQA Guidelines*. The precise location and boundaries of the proposed project are shown in Figures 1-1, 1-2, and 1-3 of the EIR. The detail is appropriate for a general plan EIR. These figures show the existing city limit line, Urban Limit Line, Planning Area boundaries, and locations of major facilities, and the Land Use Diagram showing the precise locations of existing and future land uses. In addition, the alternatives are mapped in Figures 10-1 through 10-3.

The EIR was revised to include a generalized map of existing land uses (Figure 3-1), and the locations of land use are also described qualitatively in appropriate sections of the EIR. The analysis of changes to existing land use was based on assumed development by traffic analysis zone for all land use and infrastructure impacts; these assumptions are included as Appendix A of the EIR.

C-3-24 This assumption was misstated in the DEIR and is revised in the FEIR. Analysis of loss of agricultural land within the city limits and within the Urban Limit Line was considered a significant impact of all alternatives that included this territory.

C-3-25 The alternatives analyzed in the EIR are broad alternatives for accommodating long-range development. Alternatives for individual areas were not included because the possibilities are infinite. The City Council considered the area east of CR 102 for both residential and nonresidential uses, but felt that there were many important issues to be addressed concerning growth east of 102 that would appropriately be the subject of a future study for the entire area, rather than consideration on a piecemeal basis. Such issues include compatibility of adjacent residential and nonresidential development with the wastewater treatment plant, overall urban form with respect to beginning the trend of growth to the east, and issues of safety with pedestrians (especially children traveling to school) crossing six-lane CR 102. The area in the north was already included in the Urban Limit Line in past general plans and includes some existing unincorporated development; therefore, the City chose not to remove the land from the Urban Limit Line as the City had a long-standing commitment to development of that area. The impact was considered in past EIRs, determined to be significant, and the City made findings of overriding consideration for this impact upon adoption of the 1988 General Plan.

C-3-26 See response to comment C-3-23.

C-3-27 See response to comment C-3-10

C-3-28 Recent court cases refute this assertion. In *Al Larson Boat Shop, Inc. v. Board of Harbor Commissioners* (1993), the court ruled that “deferral of more detailed analysis to a project EIR is legitimate.” It has been held that “where practical considerations prohibit devising such measures early in the planning process (e.g., at the general plan amendment or rezone stage), the agency can commit itself to eventually devising measures that will satisfy specific performance criteria articulated at the time of project approval. . . [Citation.]” (*Sacramento Old City Assn. v. City Council* (1991) 229 Cal.App.3d 1011, 1020 [280 Cal.Rptr. 478].) The *General Plan* calls for specific plans

for these areas to include measures for addressing conflicts with adjacent agricultural operations. The precise measures that will be appropriate will depend on the configuration and specific land uses to be located in these adjacent areas. These measures will be required to reduce conflicts to a less-than-significant level.

C-3-29 See response to comment C-3-11.

C-3-30 The mitigation measure discussed in this context would indeed be a *permanent* urban limit line that could not be adjusted through subsequent general plan amendments as it would entail the purchase of conservation easements. These conservation easements would be deeded to a nonprofit trust that would not allow urban development in these areas.

C-3-31 The various sections of the EIR were expanded where necessary to clarify how the policies and programs would address the environmental impacts under consideration. The analysis of consistency with the *Housing Element* was also expanded.

C-3-32 See response to comment C-3-7. The *Housing Element* was not updated as part of this project. This does not, however, preclude the need for an analysis of the housing impacts of this EIR. The EIR analyzes the increase in housing that would be permitted by the General Plan, and then the secondary impacts from this housing development (e.g., loss of agricultural land, traffic impacts). The EIR also analyzes the consistency of the other elements updated in the General Plan with the adopted *Housing Element*.

While the updated General Plan provides for a longer time frame and higher population holding capacity than the 1988 *General Plan* that it updates, the *Housing Element* is subject to special statutory requirements that differ somewhat from other General Plan elements. The adopted *Housing Element's* housing and population projections cover a seven-year time frame (the State extended the typical five-year time frame), ending June 30, 1988. By July 1, 1998, the City is required by law to have adopted a revised *Housing Element* addressing the next five year period. Within the 25-year time frame of the General Plan, the housing needs identified in the *Housing Element* can be met, as can the other goals, objectives, and policies of the plan. The section of the EIR discussing the plan's consistency with the *Housing Element* was expanded to clarify this point.

C-3-33 The acreage of vacant and underutilized land by land use designation is included in Table 2-1 of the EIR. The questions raised by this comment directly address issues and information contained in the *Housing Element*, which was adopted in 1994 after substantial public review and comment. Most new land for residential development is designated PN on the Land Use Diagram. An EIR is not required to address the issue of housing affordability. Note, however, that since the updated *General Plan* designates all the land within the city limits for residential development that was included in the *Housing Element* plus additional land to the south, the updated *General Plan* should not negatively affect housing affordability as addressed in the recent *Housing Element* update (see response to comment C-3-16).

C-3-34 The SACOG projections, while tentative at the time of publication of the *Draft General Plan* and *Draft EIR*, have been formally adopted by SACOG. The commentor questions many of the assumptions in the SACOG projections. All long-term growth projections are speculative and many factors may affect and change growth in the Woodland and within the SACOG region. In updating its General Plan, the City appropriately considered SACOG's projections and is required by law to be consistent with the regional traffic model based upon these assumptions. The City of Woodland,

however, has the discretion to consider its long term goals for population and economic growth, and plan accordingly. As part of the update process, the City determined what it considered an appropriate rate of growth and based its general plan on this.

C-3-35 Refer to response A-1-2 regarding the analysis of state highways.

The tables regarding accident data to which the comment refers are included as an appendix to Chapter 3, Transportation and Circulation, in the *Background Report*. The data in the "Critical Accident" column was inadvertently left out of these tables in the *Draft Background Report* but was corrected in the final version. This is technical information that supports the conclusions in these tables.

Caltrans completed a 1992 *Project Study Report* (PSR) that addressed potential options for providing an improved connection between I-5 and SR 113. Due to concerns regarding visual impacts and right-of-way impacts, the City is currently preparing a more comprehensive supplemental PSR that is evaluating multiple alternatives for three distinct improvement options. These options include a direct freeway to freeway connector, an arterial/expressway connector from SR 113 to I-5 using the County Road 102 interchange, and an arterial/expressway connector from SR 113 to a new interchange on I-5 east of County Road 102. The EIR was revised to reflect the future traffic volumes for state and federal highways and to elaborate on the alternatives being analyzed in the I-5/SR 113 connection study. This study was initiated and is being conducted independent of the General Plan update; the primary purpose of this study is to address regional traffic problems and to eliminate the use of through-freeway traffic using local Woodland streets. The PSR will undergo separate public and environmental review.

Addition of this information serves to clarify, but does not make any significant modifications and does alter any conclusions of the EIR. Pursuant to Section 15085.5(b) of the *CEQA Guidelines*, no recirculation is required.

C-3-36 See response to comment A-1-1, Policy 3.A.2 was revised to include level of service D or better as the threshold for facilities within a ½ mile of state or federal highways and for Downtown. As a result of this change, the FEIR identifies impacts to Main Street as potentially significant, although the traffic volumes and levels of services have not changed from what was reported in the DEIR.

Development under the General Plan will result in two segments of Main Street exceeding the General Plan's service level threshold of LOS D. Traffic improvements along Main Street between Walnut Street and Third Street require special attention to ensure they are consistent with the overall plan for the Downtown area. Mitigation measures to address this service level would include widening Main Street. This would remove existing buildings and would not be appropriate for the character of Downtown and was therefore considered infeasible. The *Downtown Specific Plan* recommended exploring one-way couplets for the Downtown area along Main Street and Court Street. Because of the effects on existing uses and very site-specific impacts of implementing this mitigation measure, it was not determined to be feasible without further investigation. This and other methods to address this area will be considered as part of the City's *Street Master Plan*, to be completed after adoption of the General Plan. This therefore remains a potentially significant impact.

The second section of Main Street projected to operate at level of service E is between Industrial Way and the I-5 southbound ramp. Possible improvements that would mitigate this impact could include widening Main Street to six lanes or construction of an improved connection between I-5 and

SR 113. This area is currently the subject of a *Project Study Report* being prepared by the City. An improved connection will substantially reduce through traffic along this stretch of Main Street, which currently serves as the main connection between these two freeways. One of the performance standards for which the PSR alternatives will be evaluated includes Policy 3.A.2 as revised above. It is the City's intent to maintain LOS D on this section of Main Street to the extent possible without creating other substantial environmental impacts. Note that the I-5/SR 113 PSR intent is to reduce regional traffic using Main Street as a connection between I-5 and SR 113. The updated General Plan is not responsible for the increase in regional traffic that would result in unacceptable levels of service along this section of Main Street; the EIR merely models all roadways in Woodland using the regional traffic model. This would be a project of regional importance, to remove regional through-traffic along Main Street. Since the City cannot unilaterally guarantee such an improvement to the state highway system, this is still considered a potentially significant impact.

The other potentially significant impact identified above is the segment of Gibson Road between Third Street and East Street, which just exceeds the level of service C threshold. This impact could be mitigated by widening this roadway, but since the Project Study Report for the I-5/SR 113 connector will result in a redistribution of trips in this area, it does not appear reasonable to widen it without further evaluation. A new roadway connecting the area southeast of East Street to College or Third Street would also mitigate this impact. The increased traffic on College or Third could be out of character with the residential area. A more appropriate mitigation would be the addition of policy to the General Plan requiring the Project Study Report to contain an evaluation of this location as part of the traffic analysis, and to recommend any needed improvements identified as a result of this analysis. Without knowing the outcome of such a study, however, the impact on Gibson Road is still considered a potentially significant impact.

Since these locations are very localized circumstances that will not exceed level of service standards until late in the planning period, the EIR identifies these as potentially significant impacts. It should be noted, however, that future studies may result in roadway improvements that improve the levels of service; since these are not guaranteed at this time, the EIR makes conclusions of impacts without consideration of these possible mitigations.

In this case, neither the project nor the environmental setting have meaningfully changed. The DEIR clearly identified the levels of service along Main Street, and these levels of service have not worsened between the Draft and Final EIRs. As evidenced by this comment submitted on the DEIR, readers of the EIR were aware of the increased traffic along Main Street resulting from the project, therefore, recharacterizing it as "significant" in response to this comment does not warrant recirculation.

C-3-37 The traffic modeling and results are summarized in Chapter 4 of the EIR. Traffic model documentation and information regarding future traffic volumes is available at the City of Woodland Public Works Department, 300 First Street, in Woodland. Given the highly technical nature of this information, it is not reproduced here but is available upon request.

C-3-38 Refer to response to comment A-1-4.

C-3-39 The Caltrans 1992 PSR will be superseded by the City's current supplemental PSR. This new PSR will consider potential conflicts with all existing and planned local roadways. In addition, the planned roadway does not conflict with the preferred alternative from the 1992 PSR.

- C-3-40 See responses to comments A-1-1 and C-3-36. The PSR study is a separate, independent study to address regional traffic connections between I-5 and SR 113. It is true that by removing regional, through traffic from Main Street, an I-5/SR 113 connector may improve traffic conditions that have been identified in this EIR. However, it would not be appropriate to delay action on the General Plan until the City completes the PSR study. The EIR appropriately characterizes impacts on those roadways that exceed LOS standards as significant without assuming that the I-5/SR 113 connector would mitigate those impacts.
- C-3-41 See responses to comments A-1-1, C-3-36, and C-3-40. The EIR was revised to identify the mitigation measures that would be necessary to reduce the roadway levels of service. Where appropriate, the significant impacts that may be caused by these mitigation measures are identified. The mitigation measures were found to be infeasible for the reasons stated in the FEIR.
- C-3-42 See response to comment C-3-36. The FEIR identifies the impacts on Main Street as significant based on the revised service level policy. Note that this is only a change in characterization of the impact; the traffic volumes and level of service did not change between the Draft and Final EIRs.
- C-3-43 See response to comment C-3-42. *CEQA Guidelines* Section 15088.5 require recirculation only “when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term ‘information’ can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not ‘significant’ unless the EIR is changed in a way that deprives the public of meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement.” In this case, neither the project nor the environmental setting have meaningfully changed. The DEIR clearly identified the levels of service along Main Street; and these levels of service have not worsened between the Draft and Final EIRs. As evidenced by this and other comments submitted on the DEIR, readers of the EIR were aware of the increased traffic along Main Street, therefore, recharacterizing it as “significant” in response to this comment does not warrant recirculation.
- C-3-44 The I-5/SR 113 improved connection is one potential mitigation measure for the impact to Main Street between Industrial Way and the I-5 Southbound Off-Ramp. As stated in response A-1-1, the revised Policy 3.A.2 will be used as a performance standard for the evaluation of PSR alternatives. The General Plan policy calls for level of service D on this section of Main Street. Widening the road was determined to be infeasible because of impacts on surrounding properties. Further, the financing of this improvement is also being addressed as part of the PSR. Again, note that the EIR does not assume that the connection will be built, and characterizes impacts without construction of this facility. As an informational document, the EIR does appropriately describe this study, since it is an ongoing independent study, and suggests that construction of such a facility may mitigate some impacts on Main Street and Gibson Road. Also see responses to comments C-3-36 and C-3-40.
- C-3-45 See response to comment C-2-6. Again, as discussed in response to comment C-3-28, in *Al Larson Boat Shop, Inc. v. Board of Harbor Commissioners* (1993), the court ruled that “deferral of more detailed analysis to a project EIR is legitimate.” It has been held that “where practical considerations prohibit devising such measures early in the planning process (e.g., at the general plan amendment or rezone stage), the agency can commit itself to eventually devising measures that will satisfy

specific performance criteria articulated at the time of project approval. . . [Citation.]” (*Sacramento Old City Assn. v. City Council* (1991) 229 Cal.App.3d 1011, 1020 [280 Cal.Rptr. 478].) Policy 4.C.1 appropriately calls for continued investigation of safe yield of groundwater model and other water supply options to determine the long-term water use for the city to ensure that the groundwater basin will not be significantly affected by long-term growth. The plan includes appropriate mitigation measures to ensure that no significant impacts will result while the City is determining its long-term water supply (see Policies 4.C.1 through 4.C.10 and Implementation Programs 4.5 through 4.8).

- C-3-46 See response to comment C-3-17. The implications of buildout are analyzed in all areas to ensure that major infrastructure (e.g., roadway rights-of-way, water and sewer trunklines) were reserved to ultimately serve development after 2020. The implications are described qualitatively, however, as such long-term projections are assumed to be too speculative.
- C-3-47 Agricultural water demand estimates were based on annual water use factors developed by the California Department of Water Resources for crops typically grown in the area. The water use factors are general estimates and do not take into account the fallowing of land. Even if a more detailed analysis were conducted on crop water usage within the Planning Area, it is not anticipated that the results of the impact analysis would change significantly since this is a cumulative analysis that assesses water use at a planning level of detail.
- C-3-48 The City has conducted previous analyses of supplemental surface water supplies and the conceptual level costs associated with developing a surface water treatment program by itself and jointly with the City of Davis. Results indicate that construction costs alone associated with a surface water treatment plant may be \$16 to \$18 million. Options in addition to or in conjunction with a surface water treatment program are recommended for investigation in Policy 4.C.1. There are other non-construction costs associated with obtaining a surface water supply and conveying it to the city or surrounding lands, such as environmental compliance and permitting costs, water purchase costs, and legal costs. Additional work is needed to refine the previous investigations and to look in more detail at the feasibility of conjunctive use programs, recharge programs, and the best option for a surface water supply. In connection with Policy 4.C.1 and Implementation Program 4.5, the City will continue to participate in such investigations in connection with efforts by the Yolo Water Resources Agency and the Yolo County Flood Control and Conservation District.

While Conaway asserted that surface water could be supplied to serve development of Conaway owned property and some additional land, the property owned by Conaway is located east of the domestic wastewater treatment plant, and the Eastern Growth Alternative includes only part of the 3,000 acres that Conaway proposes for development. Therefore, the EIR takes a conservative approach and assumes the Eastern Growth Alternative would be served by groundwater. Of course, surface water rights owned by Conaway is one of many options for possible future water supplies that may be considered in Policy 4.C.1. It should also be noted that use of surface water supplies may also have significant environmental impacts, which would need to be evaluated further.

- C-3-49 See responses to comments B-3-4 and B-3-5 regarding subsidence and groundwater levels. The EIR has been revised to clarify the intent behind the impact analysis. The EIR has been revised to clarify the intent behind the impact analysis. Due to the lack of detailed information on aquifer characteristics, the EIR impact analysis was based on an estimate of increased groundwater use over that occurring presently on an average annual basis. The current use was based on an estimate of agricultural groundwater use on lands to be converted to urban uses and added to the current City

well production estimates. An increase in groundwater use within the Planning Area would not necessarily result in a significant impact to the aquifer or result in additional subsidence. To address the possibility of an impact occurring, mitigations were included to reduce current and future urban water consumption and identify the safe yield of the groundwater basin (Policies 4.C.1 through 4.C.10 and Implementation Programs 4.5 through 4.8). These policies also encourage the City to develop long-range water management programs. Implementation of these programs will aid in detecting and preventing future water supply problems. Also see response to comment C-2-6. The impacts are appropriately defined as less-than-significant, therefore no recirculation of the EIR is required.

C-3-50 Malcolm Walker, of Larry Walker and Associates, environmental engineers under separate contract with the City, in his letter dated March 30, 1995 (on file at City of Woodland Public Works Department, 300 First Street), provided an overview of the regulatory requirements that are or will impact the City with respect to storm water quality. This information was summarized in the report entitled, *City of Woodland Storm Drainage System Master Plan -- Phase 1*, prepared by Borcalli & Associates, August 11, 1995, and is also summarized in the *Background Report*. (Both documents available for review at the City of Woodland Community Development Department, 300 First Street (General Plan reference shelf).

The question as to what standard must be met is addressed in Policy 4.E.5, which requires compliance with applicable state and federal pollutant discharge requirements.

C-3-51 The City's adopted *Source Reduction and Recycling Element* contains policies and programs for meeting state-mandated requirements for waste reduction. The *Source Reduction and Recycling Element* will be a component of the County's *Integrated Waste Management Plan* and planning for future countywide disposal requirements. Both the *Source Reduction and Recycling Element* and the *Countywide Integrated Waste Management Plan* must be reviewed and updated to ensure compliance with their programs and objectives. If the City fails to achieve its state-mandated goals, this would be determined through review of these plans and appropriate remedies that would be instituted at that time.

The EIR assumes that the City will comply with applicable state and federal laws, including mandated waste-reduction targets, just as it assumes that the City will comply with state water quality regulations, building codes, air quality regulations, and other legal requirements. To assume that Woodland would not comply with state-mandated waste reduction targets would also open the door to the assumption that no communities in the county, or throughout the state, would meet these targets, and would alter waste planning in the county. The City is obligated to comply with law.

C-3-52 While urban development will increase stormwater runoff, note that it will be partially mitigated by the associated reduction in agricultural runoff as these areas are developed for urban uses. The City's storm drainage system takes water through a series of channels before its ultimate release; also assists in removal of pollutants. Policy 4.E.4 requires mitigation of impacts from new development, and Policy 4.E.5 requires compliance with all state and federal water quality regulations. Implementation Program 4.11 calls for the City to develop a storm drainage ordinance to address water quality. These policies and programs establish an appropriate standard for future projects to ensure no significant impact on water quality. No recirculation of the EIR is necessary.

C-3-53 See response to comment C-3-52.

C-3-54 This comment supports the conclusions of the EIR. See also response to comment C-2-12. The EIR concludes that cumulative impacts on habitat are potentially significant. The EIR further notes that mitigation of this impact could be accomplished through local participation in a regional habitat conservation plan.

As an informational document, it is certainly useful for the EIR to note that such an HCP for Yolo County is under preparation, is currently undergoing public review, and is scheduled for adoption in 1996. The EIR concludes, however, that adoption of the *Yolo County Habitat Conservation Plan* cannot be guaranteed by the City of Woodland, since it is a future action and requires adoption by the Yolo County and the other cities in the county.

The EIR appropriately concludes, therefore, that the plan would have significant cumulative adverse impacts on habitat that are not mitigated as part of this project. Nevertheless, the City will continue to participate in the HCP with the intention of adopting the plan in 1996 with the other participants.

C-3-55 See response to comment C-3-28. Prior to adoption of the *Habitat Conservation Plan*, the City would of course consult with the Department of Fish and Game and other responsible agencies during the preparation of specific plans and in compliance with General Plan policies.

C-3-56 This comment appears to confuse project impacts with cumulative impacts. The EIR concludes that General Plan policies mitigate project level impacts to a less-than-significant level. As the commentor described in comment C-3-54, the EIR concludes that cumulative impacts on habitat are potentially significant, and as the commentor noted, cannot be mitigated through a habitat conservation plan that has not been adopted.

C-3-57 The Uniform Building Code's seismic zones include four zones nationwide. Of the four seismic zones used nationwide, California includes the two zones of highest potential seismicity, zones 3 and 4, with zone 4 being the most seismically active. Boundaries of the zones are determined by proximity to a fault considered capable of generating an earthquake of 6.0 to 7.0 Richter magnitude or greater. The basis for the UBC seismic zone maps are the probabilistic seismic hazard maps which have been developed by the U.S. Geological Survey in the past two decades. Woodland is in Zone 3 based on seismic safety studies that indicate the level of possible groundshaking so as to require buildings to be constructed to withstand an expected level of groundshaking. This scientific data is justification for considering Woodland a possible area of seismic activity, and to assume the opposite would be irresponsible.

C-3-58 The EIR states that the potential for lurch cracking and lateral spreading is highest in areas where there is a high groundwater table, relatively soft and recent alluvium deposits, and where creek banks are relatively high, but that these can be addressed through engineering of roads and structures. Note that the potential for lurch cracking and lateral spreading within the Planning Area would be greatest in the Eastern Growth Area because of the high groundwater table.

C-3-59 Corrections to the *Background Report* were made.

C-3-60 Reclamation District 2035's study, entitled *Assessment Report and Operation and Maintenance Valuation Assessment Role* (December 1994), is available for review in the City of Woodland Public Works Department, 300 First Street. The EIR does not contend that RD 2035 will fail to adequately maintain levees; it is only seeking to provide information on the level of deep flooding in the event that any levee failure would occur. This kind of deep flooding is more sudden and potentially

catastrophic than a 100-year flood event, and would be true of development adjacent to any major levee, as evidenced by levee failures in the Midwest in recent years. After the recent Midwest floods, the issues related to development within floodplains have been the subject of major discussion. It is a policy issue to be addressed by the City whether or not it chooses to locate new development near major levees.

While Conaway did contend in its NOP submission that flooding from Cache Creek east of CR 102 could be addressed through the construction of collection levees around the site, more extensive study would be required to determine the accuracy of this contention, evaluate the feasibility and costs of such improvements, and to evaluate the impacts of any solution to Cache Creek flooding. In addition, similar to the issue of water supply in response to comment C-3-48, it could not be assumed that Conaway would be willing to detain floodwaters on its property if only the portion of its land included in the Eastern Growth Alternative is designated for development. Therefore, the improvements suggested by Conaway as a mitigation measure are too speculative and the EIR is not required to fully analyze this mitigation. The General Plan and EIR mitigate flood hazards by avoiding designation of new residential development within the floodplain as its preferred method. It is not the role of a general plan EIR to analyze the feasibility and impacts of various flood control improvements for a regional facility.

- C-3-61 The EIR appropriately analyzes the impact of new development that would be permitted under the General Plan. While this is a general plan for the entire city, the General Plan update does not create the flooding hazards in developed areas merely by reporting new information. This flood hazard would exist with or without the General Plan Update.

Note that the City is also investigating measures to reduce flood hazards to existing development, as described in General Plan Policy 8.B.6, but chose not to expose additional residents to flood hazards as the most prudent and concrete mitigation for flood hazards. See also response to comment C-3-5.

- C-3-62 This comment supports the performance standards for noise in the General Plan.

- C-3-63 See response to comment C-2-15.

- C-3-64 Contrary to the commentor's assertion, Chapter 10 meets CEQA requirements for analysis of a reasonable range of alternatives at a level appropriate for a general plan update. All information submitted in connection with the NOP was reviewed and considered. The EIR clearly identifies significant impacts for all alternatives in an unbiased manner. The FEIR includes some revisions to the alternatives analysis to clarify its analysis, but does not include significant new information and no recirculation of the EIR is warranted.

- C-3-65 See response to comment C-3-4. This statement was not meant to indicate that residents in the Eastern Growth Area would not use services within Woodland. However, it does seem reasonable to expect that due to its direct access to I-5 and separation from Woodland, this area would be an attractive location for commuters to Sacramento, who might be expected to commute 10 to 15 minutes more for the wider range of services found in the larger city. The alternative was found to have a significant effect on land use not because of possible commuting patterns, but because development in this area would be isolated from the rest of the city by the domestic wastewater treatment plant. This runs counter to general plan objectives of a compact city, central Downtown, and avoidance of sprawl.

The FEIR does not conclude that the Eastern Growth Alternative is environmentally inferior to the preferred alternative, rather that it is environmentally superior, particularly concerning impacts on agricultural lands. Regarding the costs of relocating the treatment plant, see response to comment C-3-4. Note that if the City were to assume relocation of the treatment plant, then the Eastern Growth Alternative would include less land to the east to accommodate the projected growth, resulting in a more compact development pattern.

C-3-66 Although the commentor submitted information to the City asserting that portions of the treatment facilities could be relocated and the plant buffered, the EIR concludes that the costs of relocating the treatment plant would be too high, and that development located east of the plant would be discontinuous with the existing city and counter to many project objectives.

C-3-67 See response to C-2-16. There are many potential constraints to development of the Eastern Growth Alternative described in the EIR, including the following:

- Land within the 100-year floodplain
- Issues of land use surrounding the wastewater treatment plant, including its function in separating development from the rest of the city, compatibility of adjacent development with the wastewater treatment plant, and the effects of development on operations at the plant (e.g. roadway running through it, safety precautions)
- Economic feasibility of relocating the Contadina industrial wastewater treatment facility, including issues of loan repayment to the lending agency, since the site was acquired with a federal Clean Water Act grant
- Endangered species issues (see response to C-2-21)

C-3-68 Comment noted. The EIR identified conversion of prime agricultural land as a significant impact and an irreversible impact. The City seriously considered this impact in making policy decisions regarding growth.

C-3-69 The commentor correct in that none of the land east of CR 102 is prime agricultural land, although most is in agricultural use. Indeed, the Eastern Growth Alternative was identified as the environmentally superior alternative solely because of its relatively low impacts on agricultural lands. In other areas, however, this alternative is not environmentally superior, including flood hazards, urban form, and habitat value. Furthermore, contrary to the commentor's assertion, this alternative is not capable of meeting many of the project objectives, including compact, contiguous urban development, no residential development within flooding areas, and efficient use of public facilities and services.

C-3-70 The discussion of streets and roads for the Eastern Growth Alternative describes connections to Woodland's existing system as difficult due to the location of the wastewater treatment plan. If the wastewater treatment plant is relocated, then more direct connections to the existing roadway system would be easier. See response to comment C-3-4 regarding relocation of the wastewater treatment plant. The materials submitted by Conaway in response to the NOP were reviewed. These materials assume development of one of the I-5/SR 113 alternatives, using CR 25A connecting to an new interchange with I-5 east of CR 102. Since the preferred alignment has yet to be determined pending completion of the PSR, the EIR does not assume construction of the I-5/SR 113 connections in its analysis of any of the alternatives. To do so would also reduce the roadway impacts of the other alternatives. Note that the I-5/SR 113 alternative referenced by the commentor is the largest and

would be the most expensive to construct. In addition, its location adjacent to the regional park site and near Willow Slough, a sensitive habitat area, raise the most complicated environmental issues.

C-3-71 While neighborhoods within the Eastern Growth Alternative could certainly be designed to be pedestrian and transit friendly according to General Plan policies, allowing for internal pedestrian and bike travel, the disconnection from the rest of the community would make it more difficult for residents to walk or bicycle to services in the rest of Woodland, as it would involve traversing the wastewater treatment plant, crossing six-lane CR 102, and the crossing under SR 113 along Main Street to Downtown Woodland. This does not appear to be convenient enough to foster pedestrian and bicycle travel. While it could also be served by transit, its disconnection would again make transit use difficult until substantial development of the area had occurred, to provide a significant enough population to warrant transit service. Development to the south adjacent to the city limits would extend existing development patterns. The commentor does not explain how the Woodland “grid” pattern deters transit or nonautomotive travel, or how the ability of Eastern Growth Alternative to stray from existing Woodland patterns would allow for greater transit or pedestrian use, or provide for better location of services. The EIR concludes that contiguous development better provides for transit and nonautomotive travel and efficient public services.

C-3-72 See response to comment C-3-1. Since roughly 600 acres of the 1,800 acres east of County Road 102 (excluding the domestic wastewater treatment plant) in the Eastern Growth Alternative are owned by Conaway Ranch, it would appear inappropriate for the EIR to assume that Conaway would provide surface water to serve the entire area. Further, even if the EIR were to assume that surface water could serve this area, it would not necessarily be “clearly environmentally superior” to the preferred alternative. The General Plan includes policies to mitigate the impacts on groundwater supply to a less-than-significant level. Furthermore, construction of a water treatment plant would also have environmental impacts that could be significant.

C-3-73 See responses to comments C-3-4 and C-3-67.

C-3-74 The comment suggests specific operational methods to address odor issues. See response to C-2-11.

C-3-75 The EIR analysis takes a conservative approach in assuming alternative methods for sludge handling would be required to factor in possible future concerns about odor. Like any industrial processing, however, even with alternative sludge handling processes, the wastewater treatment plant will still emit some odors. The EIR was revised to clarify that consistent with General Plan Policy 1.H.6, buffering might be required for residential uses adjacent to the treatment plant, as would be needed for new development adjacent to any existing heavy industrial use. The Eastern Growth Alternative was not precluded because of odor buffering requirements. The EIR raised the issues of the compatibility of development with adjacent wastewater treatment facilities, as well as the location of the treatment plant functioning as a barrier between development on the east and west sides. The issues were appropriately raised as considerations with respect to the Eastern Growth Alternative, just as the EIR raised issues of conversion of prime agricultural land as considerations for the DEIR southern growth alternatives. Disclosing such information is the legally-required role of an EIR.

C-3-76 The EIR was corrected with respect to the issue of toxic gases. Again, the issue of buffering concerns the compatibility between the treatment plant, an existing heavy industrial use, and surrounding development. See also response to comment C-3-75.

C-3-77 For all alternatives, the EIR assumes loss of all habitat on lands designated for urban development. The wetlands habitat that is located in the Eastern Growth Alternative, particularly the alkaline sinks, is more regionally scarce in Yolo County and the state, and includes a significant number of endangered and other HCP target species. See response to comment C-2-15. Since much of the land within the Eastern Growth Alternative is not owned by Conaway, it would not be appropriate for the EIR to assume that Conaway would be responsible for mitigating all habitat impacts of development of the Eastern Growth Alternative by replacement habitat on other Conaway-owned land. Furthermore, it is not known if land with the proper soil types to develop replacement habitat exists on land owned by Conaway. The EIR concluded that policies of the plan would mitigate project - level impacts to a less-than-significant level, although loss of habitat would be significant on a cumulative level without adoption of the HCP.

C-3-78 The easternmost location of existing or approved residential development in Woodland is County Road 102. County Road 102 is planned for six lanes and serves the industrial area to the north as well as substantial regional through-traffic. Development east of County Road 102 to the wastewater treatment plant would be contiguous to the existing city limits, but as discussed in the previous two comments, it raises the issue of compatibility of development adjacent to the domestic treatment plant. Development of this area also raises concerns about pedestrian crossing of CR 102, especially for school children to attend schools west of CR 102. East of this area is the wastewater treatment plant. The size of this facility would serve to separate any development east of the plant from the rest of the city; it would not be contiguous with other residential development.

The distance that residents or workers in this area would have to travel to Downtown Woodland would be longer than residents or workers in development located contiguous to existing development to the south would have to travel. The longest distance via roadway travel in the preferred land use alternative would range from roughly $\frac{3}{4}$ to $1\frac{1}{4}$ miles, while travel distances from the Eastern Growth Alternative would range from $1\frac{1}{2}$ to 2 miles. This could make a significant difference in terms of encouraging cycling and walking.

Because Sacramento is the largest city and major employer in the greater region, workers in Sacramento commute from within and outside the county, particularly along the major freeway corridors, as evidenced by existing commute patterns in Yolo County (Davis, Winters, Woodland), as well as in Placer County, El Dorado County, and southern Sacramento County. Development in the Eastern Growth Alternative, served by a direct connection to I-5, would be 15 to 20 minute travel to Downtown Sacramento, closer than such existing and planned development in Sacramento County, such as Laguna West. The City expects some of the future development in Woodland to house those who work outside Woodland regardless of the land use alternative selected, but seeks to minimize that pattern as far as practical. While development in the Eastern Growth Alternative would certainly be expected to house Woodland workers, it is obviously a very convenient location of those who would commute to Sacramento.

C-3-79 Expansive soils, as are common in the alkali soils in the Eastern Growth Area, could be addressed through engineering. The type of storm sewers that would be most appropriate are based on many factors; it is possible that cast-in-place pipes might be appropriate in the Eastern Growth Area and could also be appropriate in the preferred alternative to the south. This could only be determined through specific engineering studies at a project level.

It is true that water pipes can be laid at shallow depths, although the precise depths also depend on storm sewer, wastewater, and other infrastructure that is also laid underground. Since roadways in

Woodland are typically cut two to three feet below the homes, and water pipes laid beneath these, this leaves little depth before potentially reaching the water table. Although infrastructure could be installed with additional engineering considerations, long-term maintenance would be more difficult and expensive with a high water table, and this would be an unusual situation compared with most development in Woodland. Note that the EIR raises this issue for informational purposes, but concludes that it could be mitigated to a less-than-significant level.

C-3-80 See response to C-3-60. Note that while Conaway did suggest that Conway would address flood control improvements to allow development of 3,000 acres east of the domestic wastewater treatment plant, no cost estimates or accompanying environmental analysis was included.

C-3-81 The Eastern Growth Alternative is closer to the airport noise contours (see Figure 8-15) of the *Background Report*. Note that the EIR concludes that if this became an issue, new development could be soundproofed and therefore the impact was less than significant. See response to C-2-15.

C-3-82 Comment noted. The EIR was revised to acknowledge this.

C-3-83 As noted in the various responses to comments in this letter, the EIR is adequate and meets the requirements of CEQA. No recirculation is necessary as only minor modifications and clarifications were made to the EIR. The FEIR identifies the Eastern Growth Alternative as environmentally superior to the preferred alternative, because of issues related to the irreversibility of conversion of prime agricultural land, although the Eastern Growth Alternative does have many environmental and engineering issues to contend with, and fails to meet many project objectives. See response to comment C-3-65.

D-1 Whitman F. Manley (November 29, 1995)

- D-1-1 The mitigation measure suggested by the commentor was incorporated as a possible method of establishing the permanent urban limit line in Implementation Program 1.1.
- D-1-2 Comment noted. The policy was revised to establish level of service D or better as the standard within one-half mile of state or federal highways and in the Downtown core.
- D-1-3 The I-5/SR 113 PSR is already funded through a combination of local and state sources. As part of the PSR, a financial analysis will be conducted to determine various funding options for constructing the preferred alternative. It is likely that new development will share in the responsibility for funding this improvement as required by Policy 3.A.6.
- D-1-4 The *Downtown Specific Plan* addresses issues related to Downtown, including policies limiting new theaters to within the Downtown area.
- D-1-5 This comment reflects a preference for a lower population, as considered in the No Project - No Development and No Project - 1988 General Plan alternatives.

Responses to Comments

D-2 Kenneth and Kathryn Trott (November 28, 1995)

- D-2-1 This comment addresses policy issues, rather than the adequacy of the EIR. No response is necessary.
- D-2-2 This comment addresses policy issues, rather than the adequacy of the EIR. No response is necessary.
- D-2-3 State law requires new homes to be constructed with water meters. Retrofitting of existing homes with water meters is one of the conservation programs that could be included in Policy 4.C.4.
- D-2-4 Comment noted. Policy 7.D.9 was added to reflect this concern.
- D-2-5 This comment addresses policy issues, rather than the adequacy of the EIR. No response is necessary.
- D-2-6 This comment opposes the Eastern Growth Alternative. No response is necessary.

D-3 Debra L. Gonella (November 29, 1995)

D-3-1 These comments address policy preferences, rather than the adequacy of the EIR. No response is necessary.

D-4 Robert I. Orlins, California Archaeological Consultants

- D-4-1 This comment reflects style issues that do not affect the adequacy of the EIR. Minor changes were made in the EIR for clarification.
- D-4-2 The *Background Report* was corrected to strike the word “event.”
- D-4-3 The guidelines were approved by the City Historic Preservation Commission. The 1940 used in the *Background Report* is generally descriptive; it is not policy language for City’s consideration as historically significant.
- D-4-4 The definition included in the *Background Report* explains the criteria for cultural significance. Properties could be architecturally, historically, and culturally significant. The “additional evaluation factors” are in addition to other factors for architectural, historic, and cultural significance. Archaeological resources are described later in the chapter, and would be based on Appendix K of the *CEQA Guidelines*.
- D-4-5 The sentence was clarified as suggested.
- D-4-6 The *Background Report* was revised to reflect these suggestions. Note that a records search in September 1995 of the California Archaeological Inventory, Northwest Information Center indicated no recorded archaeological resources in the Planning Area.

E-1 November 9, 1995, Public Hearing

- E-1-1 Don Sharp, representing Woodland Chamber of Commerce, submitted a letter commenting on Policy Document. Connections of County Road 25A from CR 98 to CR 102 are not needed to serve development under the General Plan. Housing mix is a policy issue; the EIR assesses the impacts on services based on the mix identified in the Housing Element. Policies of the General Plan include investigation of various water supplies. No EIR response is required
- E-1-2 David White, Woodland resident, expressed support for Alternative 1. No EIR response is required.
- E-1-3 Skip Davies, Woodland Parks and Recreation Commission, supports the park standards in the plan. No EIR response is required.
- E-1-4 Dona Mast, President of Yolo County Farm Bureau, expressed support for Alternative 2 and preservation of soils south of the city and County Road 25A as an agricultural route. See response to comment B-1.
- E-1-5 Casey Stone, Woodland resident, requested additional time to review the Draft General Plan and additional water analysis. The EIR underwent a 45-day review period, and comments on the plan were received through December 19, 1995. Policy 4.C.1 of the General Plan calls for investigation of various future water sources to serve as long-term supply.
- E-1-6 Dudley Holman, Woodland resident, expressed concern over schedule for adoption of General Plan and supported exploration of water sources to the east. The General Plan calls for investigation of various future water sources to serve as long-term supply.
- E-1-7 Don Pollock, Woodland resident, expressed concerns over the effects of growth. These effects are documented in the EIR.
- E-1-8 Don Sharp, Woodland Chamber of Commerce, expressed concern over the ratio of multi-family housing. See response to E-1-1.

E-2 November 16, 1995, Public Hearing

- E-2-1 Pat Murray, Woodland resident, expressed support for Alternative 2. No EIR response is necessary.
- E-2-2 Lois Linford, Woodland resident, expressed support for Alternative 2. No EIR response is necessary. Suggested continued reliance on groundwater rather than surface supplies. The General Plan calls for a study of various future water supplies.
- E-2-3 B.J. Ford, Woodland resident, supports Alternative 2 and growth to the east at later time. Cache Creek should be protected for future water supply. The General Plan calls for a study of various future water supplies.
- E-2-4 Kevin Haarberg, Woodland businessman, expressed support for Alternative 2 and more larger lot housing. This is a policy comment; no EIR response is necessary.
- E-2-5 Dave Taormino discussed the use of conservation easements. These are identified as a possible implementation program of the General Plan.
- E-2-6 Rich Jenness, Woodland resident and engineer, expressed support for continued reliance on groundwater supplies for municipal supplies, with additional surface water to serve agriculture. This is one of the alternatives to be studied in Policy 4-C-1 and Implementation Program 4.5.
- E-2-7 Felix Ybarra, Woodland resident, expressed support for Alternative 1. This is a policy preference; no EIR response is necessary.
- E-2-8 Paul Deering, Vice President of Yolo Land Conservation Trust, discussed use of conservation easements in the county. Comment noted. These are identified as a possible implementation program of the General Plan.
- E-2-9 Bianca Garcia, Woodland resident, expressed support for Alternative 1 and recreational facilities and bike paths, a slower growth rate, and more large lot housing. These address policies. No EIR response is necessary.
- E-2-10 Bill Glazier expressed support for Alternative 1. This addresses a policy issue. No EIR response is necessary.
- E-2-11 Suzanne Falzone, Woodland resident, expressed support for joint use facilities. This concept is contained in many of the policies in the General Plan.
- E-2-12 Ed Borchard expressed support for Alternative 2 and an agricultural study. This addresses a policy issue; no EIR response is necessary. Note that Policy 1.A.11 and Implementation Program 1.1 provide for investigation of location of a permanent urban limit line.
- E-2-13 Eric Paulsen expressed support for the Eastern Growth Alternative. This addresses a policy issue. No EIR response is necessary.
- E-2-14 Bev McWhirk, Woodland resident, expressed support for Alternative 2 and planning for traffic. The EIR describes the future traffic improvements needed and supports continued planning for roadway improvements.

- E-2-15 Andy Efstratis commented on housing mix and density. See response to comment E-1-1.
- E-2-16 Don Reed, former President of Larchmont Homes, commented on housing mix and density. See response to comment E-1-1.
- E-2-17 Dr. Jim North expressed support for Alternative 2. This addresses a policy issue. No EIR response is necessary.
- E-2-18 Mike Beeman expressed concern over effects of development on agricultural land and water use. Comment noted.
- E-2-19 Chuck Townsend, Woodland resident, expressed support for Alternative 1. This addresses a policy issue. No EIR response is necessary.
- E-2-20 Tom Stoffregen, Chair of Parks and Recreation Commission, supports a proactive approach to park and school land acquisition. Comment noted.
- E-2-21 Pat Monley, Woodland resident and small builder, expressed support for Alternative 1. This addresses a policy issue. No EIR response is necessary.
- E-2-22 Kathy Trott submitted written comment on General Plan, and expressed support for Alternative 2, and support for continued infill and higher densities. This addresses a policy issue. No EIR response is necessary.
- E-2-23 Julie Farnham expressed support for Alternative 2. This is a policy preference; no EIR response is necessary.
- E-2-24 Dudley Holman encouraged investigation of water supply alternatives. This supports policies in the General Plan.
- E-2-25 Rodney Hersom II, Woodland resident, supports preservation of existing neighborhoods as city grows. This supports the Neighborhood Conservation and Enhancement policies of the General Plan.
- E-2-26 Deborah Kunesh expresses support for General Plan principles. No EIR response is necessary.

E-3 November 28, 1995, Public Hearing

- E-3-1 Dona Mast, Yolo County Farm Bureau, expressed concern regarding water and economic effects. See response to letter B-1.
- E-3-2 Dudley Holman expressed concern over future water supplies, and requested additional mitigation measures in the EIR. The EIR was modified to include additional water mitigation.
- E-3-3 Reed Youmans expressed support for Alternative 1. This addresses a policy issue. No EIR response is necessary.
- E-3-4 Tag Demment expressed support for development of baseball facilities. Policies supporting development of such facilities are included in the General Plan.
- E-3-5 Dave Taormino expressed support for Alternative 1, opposing Alternative 2 since it would create a land ownership monopoly. The EIR is not required to address economic and social effects.
- E-3-6 Al Beard, Woodland resident and Parks and Recreation Commission member, discussed financial analysis. This is not part of the EIR; therefore, no EIR response is necessary.
- E-3-7 John Murphy, Woodland resident, expressed support for General Plan principles and southern growth alternatives. This addresses a policy issue. No EIR response is necessary.
- E-3-8 John Hunter expressed support for additional baseball facilities. Policies supporting development of such facilities are included in the General Plan.
- E-3-9 Rick Elkins stated that all land in Alternative 2 is not under one ownership and, therefore, Alternative 2 would not create a monopoly. The EIR is not required to address economic and social effects.