

WRITTEN COMMENTS

Governor's Office of Planning and Research1400 Tenth Street
Sacramento, CA 95814

November 30, 1995

JANET RUGGIERO
CITY OF WOODLAND
300 FIRST STREET
WOODLAND, CA 95695

Subject: CITY OF WOODLAND GENERAL PLAN SCH #: 95053061

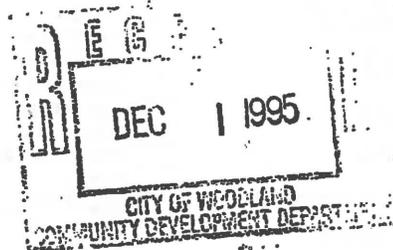
Dear JANET RUGGIERO:

The State Clearinghouse submitted the above named environmental document to selected state agencies for review. The review period is closed and none of the state agencies have comments. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call at (916) 445-0613 if you have any questions regarding the environmental review process. When contacting the Clearinghouse in this matter, please use the eight-digit State Clearinghouse number so that we may respond promptly.

Sincerely,

A handwritten signature in cursive script that reads "Antero A. Rivasplata".

ANTERO A. RIVASPLATA
Chief, State Clearinghouse

Project Title: GENERAL PLAN UPDATE

Lead Agency: CITY OF WOODLAND

Contact Person: JANET RUGGIERO

Street Address: 300 FIRST STREET

Phone: (916) 661-5820

City: Woodland CA Zip: 95695

County: Yolo

Project Location

County: Yolo City/Nearest Community: Davis

Cross Street: NA Zip Code: 95695 Total Acres: 55.841

Assessor's Parcel No. NA Section: _____ Twp. _____ Range _____ Base: _____

Within 2 Miles: State Hwy #: 113 and I-5 Waterways: Cache Creek & Willow Slough

Airports: None Railways: Southern Pacific Schools: Woodland Joint Unified Yolo Shore Line

Document Type

- CEQA: NOP Supplement/Subsequent Early Cons EIR (Prior SCH No.) Neg Des Other Draft EIR
- NEPA: NOI EA Draft EIS FONSI
- Other: Joint Document Final Document Other

RECEIVED
OCT 16 1995
STATE CLEARINGHOUSE

Local Action Type

- General Plan Update Specific Plan Rezone Ammendation
- General Plan Amendment Master Plan Prezone Redevelopment
- General Plan Element Planned Unit Development Use Permit Coastal Permit
- Community Plan Site Plan Land Division (Subdivision, Parcel Map, Tract Map, etc.) Other

Development Type

- Residential: Units _____ Acres _____ Water Facilities: Type _____ MGD _____
- Offices: Sq. ft. _____ Acres _____ Employees _____ Transportation: Type _____
- Commercial: Sq. ft. _____ Acres _____ Employees _____ Mining: Mineral _____
- Industrial: Sq. ft. _____ Acres _____ Employees _____ Power: Type _____ Watts _____
- Educational _____ Waste Treatment: Type _____
- Recreational _____ Hazardous Waste: Type _____
- Other _____

Project Issues Discussed in Document

- Aesthetic/Visual Flood Plain/Flooding Schools/Universities Water Quality
- Agricultural Land Forest Land/Fire Hazard Septic Systems Water Supply/Groundwater
- Air Quality Geologic/Seismic Sewer Capacity Wetland/Riparian
- Archeological/Historical Minerals Soil Erosion/Compaction/Grading Wildlife
- Coastal Zone Noise Solid Waste Growth Inducing
- Drainage/Absorption Population/Housing Balance Toxic/Hazardous Landuse
- Economic/Job Public Services/Facilities Traffic/Circulation Cumulative Effects
- Fiscal Recreation/Parks Vegetation Other

Present Land Use/Zoning/General Plan Use

1988 GENERAL PLAN

Project Description

TO UPDATE THE 1988 GENERAL PLAN

State Clearinghouse Contact: Mr. Chris Belsky (916) 445-0613

Project Sent to the following State Agencies

State Review Began: 10.16.95

Dept. Review to Agency: 11.22

Agency Rev to SCH: 11.28

SCH COMPLIANCE: 11.30

- Resources
- Boating
- Coastal Comm
- Coastal Conserv
- Colorado Rvr Bd
- Conservation 2
- Fish & Game # _____
- Delta Protection
- Forestry
- Parks & Rec/OHP
- Reclamation
- BCDC
- DWR
- OES
- Bus Transp Hous
- Aeronautics
- CHP
- Caltrans # 3
- Trans Planning
- Housing & Devel
- Health & Welfare
- Drinking H2O
- Medical Waste
- State/Consumer Svcs
- General Services
- Cal/EPA
- ARB
- CA Waste Mgmt Bd
- SWRCB: Grants
- SWRCB: Delta
- SWRCB: Wtr Quality
- SWRCB: Wtr Rights
- Reg. WQCB # 5
- DTSC/CTC Safe
- Yth/Adlt Corrections
- Corrections
- Independent Comm
- Energy Comm
- NAHC
- PUC
- Santa Mn Mins
- State Lands Comm
- Tahoe Rgl Plan
- Other: _____

Please note SCH Number on all Comments

95053061

Please forward late comments directly to the Lead Agency

AQMD/APCD 40 (Resources: 10, 21)

9565300d A-1

DEPARTMENT OF TRANSPORTATION

DISTRICT 3, SACRAMENTO
MS 41
P. O. BOX 942874
SACRAMENTO, CA 94274-0001
TDD 916 741-4509
FAX no. 916 323-7669
Telephone 916 327-3859



November 29, 1995

GYOL064
03-YOL-5/113
City of Woodland Draft General Plan
DEIR

Ms. Janet Ruggiero
City of Woodland
Community Development Department
300 First Street
Woodland, CA 95695

11/30/95
JA

DEC 4

Dear Ms. Ruggiero:

Thank you for the opportunity to review and comment on the above referenced document.

COMMENTS:

DEIR

A-1-1 [(Refer to page 4-3) Policy 3.A.2 provides an exception to the Level of Service (LOS) "C" standard for any roads within 1/2 mile of a State or Federal Highway. We recommend a standard of LOS "D" in these areas. Since signalized intersections normally determine the overall LOS on urban streets, it would be necessary to determine the future LOS at signalized intersections in order to better estimate the future LOS on the major roads. The LOS "E" projected for East Main Street may indicate unacceptable conditions at all of the ramp intersections in the area.

A-1-2 [(Refer to page 4-6, Figure 4-2) The number of lanes indicated for some road segments in this figure do not match the information provided in Table 4-6. This figure also does not provide any projections for State Highways, including State Route 16 (County Road 98), Interstate 5, or State Route 113. The impacts of the General Plan on the regional transportation system should be assessed.

A-1-3 [(Refer to page 4-6, Figure 4-2) The proposed new road, which is shown north of Kentucky Road, should be planned so that its intersection with West Street is located at least 600 feet away from the southbound ramp intersections at the West Street Interchange. A distance of 800 to 1200 feet is preferred.

A-1-4 [(Refer to page 4-11) Development beyond the year 2015 may significantly increase traffic volumes at the County Road 102/Interstate 5 Interchange. The need for a

Project Study Report (PSR) should be referenced in the EIR to determine the future design and right of way requirements for this interchange. The "build out" traffic demands should be used to determine the right of way requirements.

A-1-5

Figures 4-1 and 4-2 depicting street, road and highway systems in the Woodland area show obliterated State highway shield numbers for Interstate 5 and State Route 113 while the text of nearby pages addresses issues affecting these routes. The State Route 113 shield for that segment of East Street north of Interstate 5 is missing from both figures. The State Route 16 shield for the portion of Main Street west of Woodland and the portion of County Road 98 from Main Street north to the junction with Interstate 5 is also missing.

A-1-6

The EIR should assess the impacts of development on drainage systems and flood potential to State highway facilities. The last storm drainage master plan was revised in October 1987. Will the new General Plan update the master drainage plan?

GENERAL PLAN POLICY DOCUMENT

A-1-7

The redesignation of County Road 102 north of Interstate 5 as State Route 113 has been discussed for many years. This concept should be discussed in the General Plan. A policy supporting this change may be appropriate.

A-1-8

(Refer to page 3-5) Caltrans supports Policies 3.A.5 and 3.A.6 regarding funding for needed improvements to the regional transportation system. The first step is to analyze the impacts on the regional system. This has not been provided in the DEIR.

A-1-9

A specific objective or policy should be added regarding the determination of future right of way needs and preservation of appropriate right of way to address these future needs.

A-1-10

(Refer to page 3-6) Policy 3.A.7 should be revised to ensure corridor protection for any chosen Interstate 5/State Route 113 connector route as a result of current alternative studies.

A-1-11

Objectives and policies should be added to provide parallel road alternatives to minimize the use of State Highways for local trips.

BACKGROUND REPORT

A-1-12

(Refer to Figure 3-2) This figure incorrectly shows the "existing" volumes on State Route 16. According to Caltrans 1994 Traffic Volumes publication, State Route 16 had an Average Annual Daily Traffic (AADT) volume of 9800 vehicles west of County Road 98. County Road 98 north of Main Street, which is also a segment of State Route 16, had an AADT of 6800.

A-1-13

(Refer to page 3-6) Table 3-4 shows the existing LOS for intersections. Analyses of the future LOS at these intersections should also be provided.

A-1-14

(Refer to page 3-9) The discussion of Freeway Access should also mention the County Road 98 and West Street Interchanges with Interstate 5 and the County Road 25A Interchange with State Route 113.

A-1-15

(Refer to page 3-17) The LOS criteria shown in Table A-3 for Multi-Way Stop Controlled Intersections has been replaced by a more accurate method described in the Transportation Research Circular #373, July 1991, and the 1994 Highway Capacity Manual. Caltrans recommends that the newer methods be used in this analysis.

A-1-16

(Refer to page 4-8) The City contacted Caltrans regarding ponding problems at the intersection of State Route 16 and County Road 98 (Brown's Corner). The background report appeared to categorize this situation as nuisance flooding and a Blue Ribbon Committee determined the costs to rectify these types of circumstances exceeded benefits. Had the City been considering improvements here? What is the final disposition of this issue?

Please provide our office with copies of any final actions taken regarding the General Plan and subsequent documents.

If you have any questions regarding these comments, please contact Ken Champion at (916) 324-6642.

Sincerely,

ORIGINAL SIGNED BY:

**JEFFREY PULVERMAN, Chief
Office of Transportation
Planning - Metropolitan**

cc Dana Lidster, State Clearinghouse

bcc Jim Brake, Office of Traffic Operations
Trin Campos, Project Manager - West
Dennis Jagoda, Hydraulics
Scott Jackson, Office of Right of Way Engineering
Mike Forga, Special Funded
Ken Champion, District 3 - Yolo County IGR Coordinator

JP:KC:jw
GYOL064

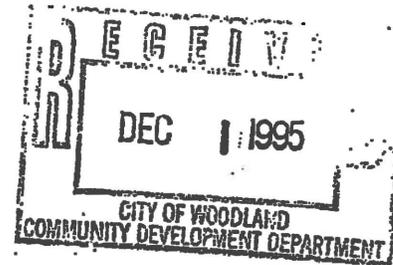
DEPARTMENT OF FISH AND GAME

REGION 2
1701 NIMBUS ROAD, SUITE A
RANCHO CORDOVA, CA 95670

(916) 358-2888



November 29, 1995



Ms. Janet Ruggiero
City of Woodland
300 First Street
Woodland, California 95695

Dear Ms Ruggiero:

The Department of Fish and Game (DFG) has reviewed the Draft Environmental Impact Report (EIR) for the comprehensive update of the City of Woodland General Plan, SCH# 95053061.

A-2-1
This project consists of development and adoption of a new General Plan for the City of Woodland, which will accomplish the following: Update and provide internally consistent General Plan goals, policies, and implementation measures; provide a comprehensive environmental assessment of impacts associated with growth and define appropriate mitigation measures to reduce or eliminate significant effects; and provide an analysis of infrastructure and service level requirements. This plan will provide for a larger urban growth boundary to accommodate population and employment growth through the year 2015.

The Planning Area for this updated Draft General Plan includes approximately 12,500 acres, including all territory within Woodland's existing urban limit line plus an expanded area to the northeast, east, and south that is currently unincorporated county territory. Most of the unincorporated area is currently vacant land or in agricultural use, but this area also includes the Yuba College site, regional park site, the City's existing wastewater treatment plant site, and the City's wastewater spray fields.

A-2-2
The DFG would like to commend the City of Woodland for requiring participation in the "Yolo Habitat Conservation Plan". This action shows that the City is interested in protecting and enhancing the fish and wildlife habitats that occur within the City and the County of Yolo.

Ms. Janet Ruggiero
November 29, 1995
Page Two

We appreciate the opportunity to review this Draft General Plan for the City of Woodland. If we can be of further assistance, please contact Mr. Roger Scoonover, Associate Wildlife Biologist, at (916) 666-3407, or Mr. David Zezulak, Environmental Specialist III, at (916) 358-2929.

Sincerely,



for L. Ryan Broddrick
Regional Manager

cc: Mr. Roger Scoonover
Mr. David Zezulak
Department of Fish and Game
Rancho Cordova, California

PRESIDENT
Dona Mast
FIRST VICE-PRESIDENT
Blake Harlan
SECOND VICE-PRESIDENT
Duanie Chamberlain
SECRETARY/TREASURER
Tara Atkinson

YOLO COUNTY FARM BUREAU

P.O. Box 1556, Woodland, California 95776
(916) 662-6316

November 28, 1995

Gary Sandy, Mayor
City of Woodland
300 First Street
Woodland, CA 95695

Dear Mayor Sandy,

On behalf of the Yolo County Farm Bureau I would like to thank you for allowing the extension of the Woodland General Plan's final decision date. This will allow adequate time for us to comment on this critical road map of Woodland's future growth. Presently, we have prepared some comments regarding the draft environmental impact report. Additional comments will be forthcoming on the policy document.

The following is a chapter by chapter summary of questions, comments, concerns, etc., which we have regarding the draft environmental impact report. Only chapters which are relevant to agricultural issues have been reviewed.

Chapter 1: Project Description and Impact Summary

B1-1

Alternative one would add approximately 1,730 acres to the General Plan, whereas alternative two would only add 1,630 acres. With regard to the conversion of prime agricultural land, alternative one contains a total of 2,296 acres of prime agricultural land which would be designated for urban development, whereas alternative two designates 2,108 acres of prime agricultural land to be converted to urban uses. Both alternatives deplete an already dwindling supply of prime farmland.

B1-2

With regard to the Sacramento Area Council of Governments (SACOG) growth rate projections for the next twenty years, the Farm Bureau believes that a 2% annual growth rate is not very practical, and may in fact be growth-inducing, as these projections have expanded the area of urban designation within the General Plan. According to the Background Report, since 1992 Woodland has grown at only 1% per year to date. Yolo County has averaged 1.2% over the last three years, and California has averaged 1.7% over the last three years. With the current depressed real estate market taken into consideration, we believe it is safe to assume that Woodland's growth rate should fall between 1 and 1.5%. The net result of this is a reduction in prime agricultural land being

permanently taken out of production. To a large degree, Woodland's growth rate will be determined by market forces. Should the demand escalate, the Woodland City Council has the option of reviewing the General Plan four times annually, in order to address any unforeseen growth spurts.

B-1-3

In section 1.10 the issue of water supply is briefly discussed. The Farm Bureau is concerned about the impact on the groundwater supply by both alternatives. Alternative two results in a net average demand increase of up to 400 acre-feet per year by the year 2015. We interpret this to mean that people who are already using the water will have to conserve heavily to support new development. Is this fair, or practical? We further believe that the City needs to take a hard look at potential new water sources, whether they supplement agricultural or urban needs.

B-1-4

Chapter one also briefly discusses the eastern growth alternative. We believe that this alternative should have been given more consideration within this general plan. This alternative has the greatest potential for minimizing loss of prime agricultural land, while at the same time opening the door for possible negotiations concerning surface water acquisition.

Chapter 3: Land Use, Housing and Population

B-1-5

The comparison of the soil types in the two alternatives was very revealing. In alternative one, 90% of the area south of the existing Urban Limit Line is prime farmland with a weighted Storie Index of 82. In alternative two, 88% of the area south of the existing Urban Limit Line is prime farmland, with a weighted Storie Index of only 65. Furthermore, of the prime farmland in alternative one, 64.8% of it has a Storie Index of 100. By comparison, 34% of the prime farmland in alternative two has a Storie Index of 100. The area designated as urban reserve, which would be included in an eastern growth alternative is composed of mostly Class III and IV soils, which are generally regarded as less desirable for agricultural production..

B-1-6

Both alternatives would result in a large amount of land being taken out of Williamson Act contracts. Under alternative one 307 acres would be taken out and under alternative two 515 acres would be taken out of production.

B-1-7

The paragraph describing mitigation measures for the loss of prime farmland is fairly direct. There are no mitigation measures to reduce the loss under either alternative of the Draft General Plan to a less-than-significant level.

Chapter 5: Public Facilities and Services

B-1-8

On page 5-5, the projected urban water demands are discussed. We believe one of the key points on this page is that Woodland's aquifer relies on irrigation water for its recharge, whereas recharge occurs to a lesser extent with landscaping. By converting surrounding

agricultural land to urban uses, the City is reducing its groundwater recharging capabilities. This results in higher pumping costs for both urban and agricultural users.

Chapter 10: Mandatory CEQA Sections

B-1-9

Section 10.6 discusses the cumulative impacts of a loss of production from prime farmland. The last sentence on page 10-26 states that "Loss of production from these lands will have an adverse effect on the overall agricultural economy." This suggests that only the agricultural sector suffers when good land is taken out of production. In fact, the entire economy of Woodland and the outlying areas will be affected. The driving force of Woodland's economy is and always has been agricultural.

Conclusion

B-1-10

The Farm Bureau believes that the easiest way to mitigate loss of farmland is to lower growth rate projections from 2% down to 1.5%. Both General Plan alternatives result in a substantial loss of prime farmland which, in turn results in a reduction of groundwater recharge. Woodland's quality of living and agricultural heritage also need to be protected to maintain a sound community.

B-1-11

On a separate note, we feel that county road 25A should be maintained as an agricultural corridor from Road 98 to East Street. This is the only avenue on the south side of town adjacent to the city which allows for agricultural equipment and commodity transportation. Converting this to a four-lane road will only hamper and eventually eliminate agricultural activity in this area.

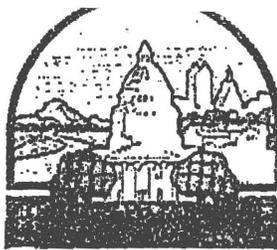
We would like to thank the Woodland City Council, staff and the Woodland City Planning Commission for their efforts on this General Plan Update.

Sincerely,

Dona Mast

Dona Mast
President

DM:kns



Sacramento Area Council of Governments

3000 "S" Street, Suite 300, Sacramento, California 95816

November 7, 1995

Ms. Janet M. Ruggiero
 Director
 Community Development Department
 City of Woodland
 300 First Street
 Woodland, CA 95695

Subject: Draft Environmental Impact Report for the City of Woodland Draft General Plan

Dear Ms. Ruggiero:

SACOG appreciates the opportunity to review the Draft Environmental Impact Report (EIR) for the City's Draft General Plan and would like to offer the following comments.

We note that the implementation of the plan will contribute to the need for many roadway improvements in the City of Woodland, some of which would be considered regionally significant under the criteria established for regionally significant transportation facilities in the 1993 Metropolitan Transportation Plan (MTP). Specifically, we see the plans to widen Gibson Road, County Road 102, and Main Street as projects that would impact regionally-significant facilities. Should any of these roadway improvements require state or federal funding or any type of federal permit, they will need to be included in the MTP if they are to move forward in the project implementation process. Nomination of projects for the MTP takes place when SACOG updates the MTP every two years.

Once transportation projects are included in the MTP, they are subject to SACOG's mitigation monitoring requirements as outlined in the Subsequent EIR for the 1993 MTP Supplement. A copy of the "Potential Project Impacts and Mitigation Measures as Identified in the 1993 Metropolitan Transportation Plan SEIR" is attached for your review. Although the transportation projects envisioned in the General Plan may not now be included in the MTP, city planning staff are in a position at this early stage of environmental review for the General Plan to anticipate the types of impacts that may result from construction of transportation improvements. Further, mitigation measures can be incorporated into the environmental document now to minimize potential impacts. SACOG staff recommend that city planning staff review the checklist and incorporate mitigation measures into the Draft EIR -- where significant impacts are found to exist -- to mitigate the potential impacts of transportation facility construction.

Ms. Janet Ruggiero

2

November 7, 1995 B-2

Again, thank you for the opportunity to review the EIR for the draft General Plan. Should you have any questions, please contact Nancy Kays of my staff at (916) 457-2264.

Sincerely,


MICHAEL HOFFACKER
Executive Director

MH:NK:bb
Enclosure

cc: Nancy Kays, SACOG (Yolo County liaison)
John Greitzer, SACOG

S:\SHARED\PROJECT\ENV\DOCR\WOODGPD.EIR

POTENTIAL PROJECT IMPACTS AND MITIGATION MEASURES
AS IDENTIFIED IN THE 1993 METROPOLITAN TRANSPORTATION PLAN SEIR

B-2

Name of Project:

Date of Review:

Type of Document:

NA = Impact/Mitigation not applicable to proposed project

X = Impact/Mitigation adequately addressed in the document

• = Impact/Mitigation not addressed in the document; SACOG recommends that the project proponent include these measures, where appropriate.

Bold-faced notes throughout the checklist refer to the subject environmental document.

POPULATION AND HOUSING

___ 1. Impact: Displacement or Relocation of Residences and Businesses

Mitigation:

___ a. Project-specific environmental reviews should include alternative alignments that reduce or avoid impacts to nearby residents and businesses.

___ b. Where project-specific reviews identify displacement or relocation impacts that are unavoidable, state and federal relocation programs should be used to assist eligible persons to relocate. In addition, construction schedules should be prepared to allow adequate time for affected commercial and industrial businesses to find and relocate to adequate substitute sites.

___ 2. Impact: Disruption of Neighborhood Character

Mitigation:

___ a. Individual projects should be designed to minimize long-term community disruption by maintaining access between residential and community services.

LAND USE

___ 3. Impact: Impacts to Sensitive Land Uses

Mitigation:

___ a. Policies regarding facility development should take into consideration potential impacts to schools, parks, and recreation areas. Mitigation measures could include creating a landscape corridor when passing through a park, providing landscaped buffer zones when adjacent to schools, or potentially re-routing planned improvements when approaching a sensitive land use.

AIR QUALITY4. Impact: Fugitive Dust Emissions From ConstructionMitigation:

- ___ a. Construction equipment should be monitored so that emissions during operation are minimized.
- ___ b. Construction equipment should use low sulfur fuels.
- ___ c. Require trucks to maintain freeboard (i.e. the distance between the top of the load and the top of the truck bed sides).
- ___ d. Access roads onto construction sites should be paved or covered with dust palliatives when applicable to the proposed project.

WATER RESOURCES5. Impact: Degradation of Existing Vernal PoolsMitigation:

- ___ a. Whenever possible, re-route facilities around existing vernal pools to ensure no net loss of vernal pool acreage, values, or functions. When this is not feasible, require off-site mitigation at areas approved as "mitigation banks". As a last resort, require in-kind compensation for the type and functional value of such pools. Any mitigation of eliminated vernal pools shall, at a minimum, replace lost acreage on a one-to-one basis.

6. Impact: Degradation of Natural Riparian or Marsh AreasMitigation

- ___ a. Whenever cut activities are required for a new or expanded facility, slopes should be constructed to enhance vegetation growth.
- ___ b. Use best management practices for citing, construction and operation of transportation improvements, including controls to limit toxic chemicals from entering receiving waters.

BIOLOGICAL RESOURCES7. Impacts: Potential Degradation of Sensitive Habitats and Potential Adverse Impacts to Endangered and Threatened SpeciesMitigation:

- ___ a. Carry out all necessary surveys prior to completion of the permit process for specific

projects to determine the actual project-specific biological and ecological impacts and appropriate mitigation measures, as approved by applicable agencies (e.g. Army Corps of Engineers, Environmental Protection Agency, California Department of Fish and Game, Fish and Wildlife Service, and/or National Marine Fishery Service).

- ___ b. Require surveys as part of the planning process for all species that are candidate, proposed or listed under the federal and state Endangered Species Acts, and require adequate mitigation for any development that would have an adverse impact on listed/candidate species.

CULTURAL AND HISTORIC RESOURCES

___ 8. Impact: Possible Damage Destruction, or Removal of Unrecorded Cultural Resources

Mitigation:

- ___ a. Conduct an archeological field survey if a development area is identified as "sensitive." If the field survey and analysis identify significant cultural resources, apply appropriate mitigation measures as identified by State Historic Preservation Office (SHPO) and Appendix K of CEQA.
- ___ b. Coordinate and develop appropriate policies and mitigation measures with SHPO, Native American Heritage Commission, and other appropriate Native American agencies and Native American groups when Native American burial sites are encountered.

AESTHETICS AND VIEWS

___ 9. Impact: Disruptions to Important View or Adjacent Landforms, Introduction of New Visual Elements in an Existing and Established Landscape and Impacts on Designated or Eligible Scenic Highways.

Mitigation:

- ___ a. Enhance existing environmental design resources or minimizing displacement of these resources;
- ___ b. Minimize negative proximity effects, such as incompatibilities of physical scale;
- ___ c. Minimize negative barrier effects, such as impairment of views or disruption of design continuity.
- ___ d. Capitalize on opportunities to spatially unify an area.
- ___ e. Recontour adjacent landforms where affected by corridor improvements to provide a smooth and gradual transition between modified land forms and existing grade to avoid the appearance of manufactured grading.
- ___ f. Recontour cut and fill slopes where feasible to vary the contour to create a more natural appearance.

- ___ g. Use berms and landscaping to screen views of the facility.
- ___ h. Select landscaping materials that recognize the opportunities for enhancing slope land form variation, erosion control, and fire retardation, including natural vegetation in appropriate locations and densities to fit into the natural setting.
- ___ i. Consider split-level roadways to conform to terrain, and bridges, structures, or tunnels where appropriate.
- ___ j. Consider special structural design provisions (such as bridge type selection) to develop architectural design theme for each corridor.
- ___ k. Coordinate between implementing agencies (Caltrans, cities, counties) and local jurisdictions to apply design review procedures as appropriate and necessary to minimize adverse effects of new construction.
- ___ l. In addition to the measures cited above, planned corridors in largely undisturbed viewsheds should be considered for State or County Scenic Highway designation in advance of construction. Potentially eligible new corridors in the MTP include the following:

- ** Route 70 (Marysville Bypass),
- ** Route 70 (from the Marysville Bypass to Butte County Line),
- ** Route 65 (Lincoln Bypass),

A Scenic Highway designation would help ensure that the facilities' alignment, design, and structures, as well as surrounding new development, would be planned and constructed with a high priority for scenic values.

UTILITIES AND SERVICES

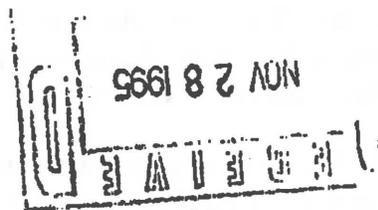
___ 10. Impact: Increased Water Needs Resulting From Transportation Facility Construction/Maintenance

Mitigation:

- ___ a. The use of non-potable water is preferred for mixing construction materials, washing down surfaces, and wetting down dirt-covered surfaces.

November 17, 1995

Janet Ruggiero
Planning Director
City of Woodland
300 First Street
Woodland, CA 95695



Re: City of Woodland Draft General Plan - Comments of Reclamation District 2035
to Draft Environmental Impact Report (SCH No. 95053061)

Dear Ms. Ruggiero:

Reclamation District No. 2035 ("RD2035") provides water service and flood and drainage protection to the area adjacent to the City of Woodland's eastern boundary. As future urban development within the City's urban limit line may impact the District's operations, RD2035 has reviewed the above referenced Draft Environmental Impact Report ("DEIR") and its related documents and has the following comments with respect to water supply and drainage issues.

Groundwater Impacts

1. Section 5.1 of the DEIR analyses the potential impacts of increased urban development on groundwater supplies within and adjacent to the City. At page 5-4 and in Table 5-3, the DEIR concludes that the conversion of land from existing agricultural uses to urban use will not affect groundwater resources. The DEIR states that "subtracting the future urban water demands from existing agricultural demands results in a projected surplus of water"

B-3-1

The basis for this conclusion appears to be a comparison of per acre applied water values for crops grown in the area (assumed to average 3.25 acre feet per acre per year) with per acre demands for various kinds of urban uses, as depicted on Table 5-1. We are concerned that this analysis does not take into account two factors which may increase the impact on ground water resources of the proposed changes in land use.

B-3-2

First, a significant portion of applied irrigation water is returned to the groundwater basin as deep percolation. While some urban outdoor water uses result in similar deep percolation, we believe the amount returned to the groundwater basin is much smaller. The increased amount of impervious cover combined with the way outside watering is accomplished means more of the water that is not consumed by plants ends up in the storm drains, increasing the net use of water above that experienced in an agricultural setting. Because the DEIR does not adequately address

this issue, RD 2035, requests that the differential deep percolation be evaluated in determining the impact on groundwater resources.

B-3-3

Second, the increased impervious cover resulting from urbanization will reduce the amount of precipitation that can percolate into the groundwater basins during the winter months. Again, a portion of the water that has historically reached the aquifer will be diverted to the storm drain system. This effect should be factored into the equation before concluding that urbanization will reduce the impact of pumping on the local groundwater basin. Accordingly, an analysis of this type should be included in the final EIR.

B-3-4

2. The DEIR, at page 5-8, discusses the potential for subsidence as the result of groundwater pumping. RD2035 believes that this discussion should be expanded to analyze whether the change in groundwater pumping patterns that occurs when land is converted from agriculture to urban uses increases the risk of subsidence. Agricultural pumping is seasonal and the lack of pumping in the winter months allows the portion of the aquifer that was dewatered in the summer to be resaturated in the winter. We believe that this reduces the risk of permanent subsidence. On the other hand, while urban pumping has a seasonal summer peak, pumping occurs all year. Therefore, a portion of the aquifer that, under agricultural use, was resaturated during the winter may not be resaturated with an urban pumping pattern. Additionally, the hydrostatic pressures between aquifers may be permanently disrupted or altered, which in turn could result in permanent subsidence. We believe that this will increase the risk of long-term subsidence and request that this potential impact be analyzed in the EIR.

B-3-5

3. The DEIR does not appear to address the effects of expanding urbanization on the current cone of depression problems which the City of Woodland is experiencing. Expansion of the urban pattern of continual groundwater pumping would seem to increase the potential for cones of depression in the groundwater aquifers. The EIR should analyze any problems resulting from cones of depression and their impacts on groundwater, both within the proposed city limits and on adjacent lands.

B-3-6

4. On page 5-8 of the DEIR, it is inferred that water quality problems in the future are unknown but that additional groundwater demands are likely to have significant negative impacts. Given that there are wells in Yolo County that have boron and other contaminant contents, what are the likely impacts to groundwater quality within the proposed city limits and on adjacent lands? We believe that the EIR should analyze any negative impacts which are likely as a result of overall decreases in supply and system reliability due to the increased continual pumping demands proposed in the DEIR.

B-3-7

5. At page 5-1 of the DEIR, the Water Resources Association is misidentified as the Water Resources Agency. This should be corrected. At the same place it is stated that all Yolo County water purveyors are members of the WRA. This statement should be corrected as RD2035 is not a member.

Flood Control and Drainage Impacts

B-3-8

6. At page 5-26 of the DEIR, it is stated that a new ditch to convey storm water flows will be constructed from the west to the east across the Yolo Bypass to the Tule Canal. RD2035 operates and maintains its main water supply canal immediately south of where the new ditch will be constructed. It is unclear in the DEIR whether the new ditch will also be north of the Yolo

Shortline Railroad trestle. The construction of such a ditch could increase the turbulence of flood waters flowing south from the Fremont Weir through the Bypass. Such increased turbulence could cause additional erosion and scour at RD2035's main ditch and possibly at the railroad trestle. This potential impact should be evaluated in the EIR.

7. At page 5-24, the DEIR states that the City's pump stations at the southwest corner of the Cache Creek Settling Basin was designed to provide a combined capacity of 900 cfs into the outfall channel. RD2035 does not believe that the existing outfall channel can handle the design flow without serious risk of over topping or failure of the Old South Levee of the Cache Creek Settling Basin. The potential problems with the existing outfall channel require much more detailed evaluation in the EIR. This evaluation should include the following:

B-3-9

a. There is no gate structure separating the outfall channel from the Yolo Bypass. This will cause a backup of water from the Bypass into the channel during time of high water in the Bypass, thereby reducing the capacity of the outfall channel. This combination will create an increased risk of flooding of lands within RD2035.

b. The Background Report at page 4-10, states that the Corps of Engineers and the California Department of Water Resources have proposed to install flap gates at the point where the outfall channel meets the Yolo Bypass levee. RD2035 would support this proposal as it would allow the Old South Levee to be decommissioned. However, installation of the flap gates would, in our opinion, require the installation of standby pumps at the Bypass levee to move storm drain runoff from the outfall channel, over the levee, and into the Bypass at times when the Bypass is flooded. These structures and facilities and their proposed operation should be discussed in the EIR.

8. The DEIR, at page 10-4, and the Background Report, at page 4-12, discuss flooding in the case of levee failures. RD2035 has several problems with the way the information is presented and believes that the impressions left need to be corrected.

B-3-10

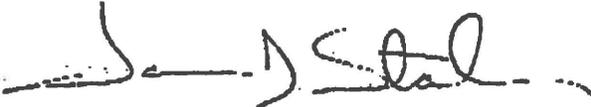
a. The Background Report refers to RD2035's assessment report as finding that "lands located to the east of Woodland would be subject to 6.5 to 16 feet of inundation should the bypass levee fail." That report was prepared for the purpose of determining what assessments should be levied upon lands within the Districts boundaries for the flood and drainage protection that the District provides. Therefore, it discussed the depth of flooding in the absence of protection (which is relevant to the degree of protection provided) only for lands within the District. The citation can not be used to infer, that if a levee failure occurred, lands to the west of the District's boundaries would not be subject to flooding as well. In the event of a bypass levee failure, substantial acreage within the City's proposed urban limit line, depending on elevation, would be subject to flooding similar to that described in RD2035's assessment report. The EIR and the background report should be corrected to eliminate the misimpression that land west of RD2035's boundaries would be safe from flooding if a bypass levee failure occurred.

b. The Background Report also states that the lands to the east of the City (i.e., lands within RD2035) could be subject to deep flooding from overflows from Cache Creek. This would seem to be true only if lands to the west of the District were also flooded, as a Cache Creek overflow would most likely occur in an area upstream from the District. The implication in the background report that Cache Creek flood risks are limited to lands east of the City should be corrected.

B-3-11

c. Finally, the EIR and the Background Report seem to imply that there is a significant risk of Yolo Bypass levee failure that is relevant to the City's planning activities. The fact that RD2035 evaluates how much to assess property for levee maintenance based on the type of damage those lands would suffer if the levees failed should not be used to imply that there is a substantial risk of levee failure. RD2035 consistently receives the State's highest rating for its maintenance of those levees. We are confident that the levees are sound and that potential failure need not be a basis for planning decisions. The EIR should reflect that the risk of levee failure is no greater than for other well maintained levees designed to protect life and property.

Very truly yours,



James D. Staker
General Manager

/cw

cc: RD 2035 Board of Trustees
Kris Kristensen



November 2, 1995

520 MAIN STREET
WOODLAND, CA 95605
916/662-7327
FAX 916/662-1086

Honorable Gary Sandy, Mayor, City of Woodland and Members of the Woodland City Council

Jan Hicks, Chairperson, City of Woodland Planning Commission and Planning Commissioners

The Woodland Chamber of Commerce applauds your successful efforts to move the General Plan Update/ revision in a positive direction. The Chamber has reviewed the General Plan Policy document and the Environmental Impact Report. The Woodland Chamber of Commerce recommends the following:

B-4-1 1. The area identified for future growth should include lands South of the current city limit line to Road 25A with a West boundary of Road 98 and an East boundary of Road 102; also lands North of the current city limits to the junction of Road 98 and Interstate 5 with a West boundary of Road 98 and North/East boundary of Interstate 5. Action should be taken by the city of Woodland to protect prime agricultural lands to the South of Road 25A and to the West of Road 98 from development and growth beyond the scope of the current general plan area and direct growth in an Easterly direction. The Chamber does not promote full development of the lands South to Road 25A but we believe that Road 25A needs to be included in this General Plan update as a major transportation route of the future, as defined by this general plan. Lands South to Road 25A from 98 to 102 should provide for future residential needs, recreational/open space, commercial growth and possibly an agricultural preservation zone within the City. Lands to the North should provide for future ag-industry, commercial and recreational /open space needs.

B-4-2 2. A connector for Highway 113 and Interstate 5 is crucial. Because there is an interchange at Road 25A and Highway 113 the Chamber recommends that Road 25A be identified as a future connector from Highway 113 East to Interstate 5, possibly at the Road 103 overpass. Road 25A West of 113 may need some improvement as a two lane road for an agricultural thoroughfare and other traffic to relieve pressure on Gibson Road and other southern thoroughfares.

B-4-3 3. The Chamber recommends a housing mix of 85% single family and 15% multi-family. The ratio of 35% multi-family, as indicated in the draft, is of concern, not only to the

Chamber but to local law enforcement, as a large number of service calls involve apartment dwellings. This imbalance could result in higher costs for services and lower community wellness and quality of life for the tax paying citizens.

B-4-4 4. Development East of Road 102 should be explored for the future but lands East of 102 should not be included in this General Plan update. Because of issues concerning flood hazards, odors, wildlife and, economic impacts in relocation of the City sewage treatment facility, these lands along the Interstate 5 corridor should be studied thoroughly beginning immediately after the adoption of this General Plan.

B-4-5 5. The Chamber strongly supports the Water Supply and Delivery Goal 4.C and policies indicated in the Draft General Plan Policy Document date September 1995 on page 4-4 and 4-5. We believe the policies stated protect the future water supply of the City of Woodland and should be an essential part of the General Plan.

B-4-6 6. More considerations should be given in the policy document to economic development. A strong economic development policy could help Woodland generate more revenue to maintain the quality of life.

Adoption of this General Plan is crucial to the continued improvement of Woodlands' economy and the Chamber recommends adherence to the current timeline set by the City Council.

Thank you for your consideration.

Sincerely,

Cyndi Blickle, President

cc: Yolo County Farm Bureau

November 28, 1995

Janet Ruggiero
Community Development Director
City of Woodland
300 First Street
Woodland, CA 95695

NOV 29 1995
CITY OF WOODLAND
COMMUNITY DEVELOPMENT DEPARTMENT

Re: Comments regarding City of Woodland Draft General Plan, Draft Environmental Impact Report

Dear Janet:

As representatives of the "Turn of the Century" project and its property owners, the following comments are provided relative to the Draft General Plan EIR:

1. Page 3-15 and 16 relating to the "Urban Agricultural Conflicts" for the parcel north of Road 25A and east of East Street.

The draft EIR indicates a more significant impact for this parcel due to abutting urban development and the Highway 113 freeway. We believe the urban/agricultural conflict is no greater for Alternative 2 than Alternative 1 because:

- a. The same General Plan policies for buffering Alternative 1 would apply to this parcel in Alternative 2, thereby reducing impacts;
- b. Agricultural practices or operations would not change compared to those currently used despite closer urban development (such as aerial applications/spraying);
- c. The freeway has existed for years abutting this parcel with no increase in pressure to develop this parcel; and,
- d. Measures to preserve this parcel in its agricultural state are available if it is the desire of the City, thereby eliminating any conversion to urban.

C-1-1

2. Page 3-16 relating to Williamson Act of the 160 acre parcel in Alternative 2.

The EIR indicates that the parcel has not filed for non-renewal and that it can't be guaranteed to occur, therefore, Alternative 2 has a significant impact vs Alternative 1. We believe that this analysis is erroneous because:

C-1-2

C-1-2
(cont)

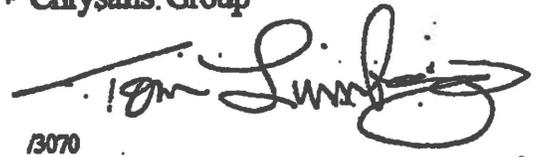
- a. The same situation occurs for the smaller 30 acre parcel in that the parcel has not filed for non-renewal and cannot be guaranteed to occur;
- b. The soil qualities on the parcel in Alternative 2 are poor to very poor compared to the parcel in Alternative 1, so the agricultural value of the parcel is less. For example, the soils are Capay Clay (Stone Index 50) and Pescadero Clay (Stone Index 14); and,
- c. Mitigation measures could be devised to reduce the impact by replacing the 160 acres with lands on another site of even better soil conditions through Williamson Act or conservation easements.

With these comments, we believe that Alternative 2 has no such significant agricultural impacts as indicated in the draft EIR.

If you have any questions, please contact us.

Sincerely,

Chrysalis Group



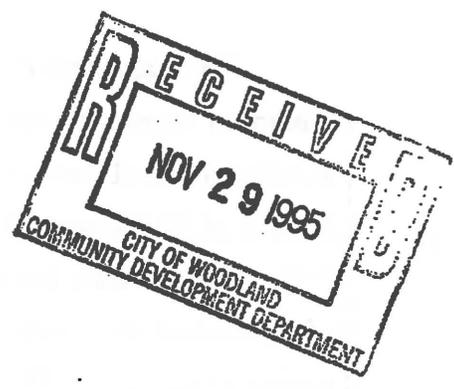
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**WILLIAM ABBOTT
& ASSOCIATES**
ATTORNEYS AT LAW

William W. Abbott

Diane G. Kindermann

November 29, 1995



HAND DELIVERED

Ms. Janet Ruggerio
Community Development Department
City of Woodland
727 Second Street
Woodland, CA 95695

Re: Review of the DEIR for the General Plan Update

Dear Ms. Ruggerio:

As you know, my firm has served as counsel to the owners of the Heidrick Property, approximately 175 acres of land located between Road 102 and the City Sewer Ponds, and south and southeast of the approved auto mall. Given that the General Plan will become the blue print for community character and growth for the next decade, my clients are very concerned about the impending General Plan decision, and therefore, in response to the Draft EIR, they submit the following comments. The various partnerships and individuals with interest in the above-referenced property and on whose behalf these comments are submitted, are Woodland Country Club, a limited partnership; Rancho 102, a general partnership; Woodland 102, a general partnership; and Bruce Nott and Bob Eoff, the latter two holding varying interests in the above-referenced partnerships. Mr. Eoff is also a taxpayer, property owner and resident of the City of Woodland.

Ms. Janet Ruggerio
November 29, 1995
Page 2

The DEIR Contains a Fundamental Flaw in that the Analysis of Environmental Impacts is Based Upon a "Plan to Plan" Comparison, and not "Plan to Existing Environment."

C-2-1

The California courts have been clear that an EIR for a general plan is inadequate in analyzing impacts where it compares a proposed Plan to the existing General Plan and not the existing physical environment. In Environmental Planning and Information Council v. the County of El Dorado (EPIC) (1982) 131 Cal.App.3d 350, the appellate court held invalid an EIR which, because the new plan provided for a reduction in population from the existing plan, reached the conclusion that the project would have less than significant impacts on the environment. The DEIR is at odds with the ruling in the EPIC case because in many impact categories, the document omits that increment of development which is allowed for under the existing General Plan but has not been constructed.

To use an example, the Southeast Area contains a large area planned, but not yet constructed, for residential development. The DEIR at Figure 9-1 shows this area as being subject to flooding. The DEIR treats this same flood risk as potentially significant in other areas outside of the existing City limits, but states "Existing development located within the Planning Areas may continue to be exposed to flooding and dam inundation hazards, but this is not considered an impact of new development under the Draft General Plan." (Page 9-6.) In this case, such an approach understates the exposure of new growth to what the City has identified as an environmental risk. Had the City properly recognized the risks to new residents within the existing City limits as an impact to be addressed, the City would have been obligated to identify possible mitigation strategies. Since enhanced flood protection to the Southeast Area would not end with Road 102, my clients' property would in all likelihood receive a higher level of flood protection as well, thereby eliminating one of the constraints used by the City to fully study the Eastern Growth option.

I would also add that elsewhere, the DEIR is inconsistent with respect to the level of development subject to analysis. In the chapters discussing land use and agriculture, environmental review was based upon a review of the new growth increment. Yet the public

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services, noise, traffic and air quality analyses appear to review new growth in relation to the existing physical environment. The DEIR is neither complete nor internally consistent.

The Impacts Resulting from the Urban/Agriculture Conflict are Understated.

The DEIR states at page 3-15 that impacts resulting from the urban/agriculture interface are less than significant due to specific policies in the Draft General Plan. However, a close examination of the Draft General Plan policies does not support this conclusion. A planning requirement for the new Planned Neighborhood areas must "address..(1.) Provision for minimizing conflicts between new development and agricultural uses." (Page 1-15.) No implementation program is included to address this requirement. Similarly, on page 1-29, "The City shall require development within or adjacent to designated areas to minimize conflicts with adjacent agricultural uses." Despite the fact that the City's consultant reported to the City a number of techniques for minimizing impacts, none of those are reflected in the Draft Plan or in the DEIR as specific mitigation measures. (Report, J. Laurence Mintier, May 26, 1995.) The above-quoted policies are not adequate by themselves to assure citizens that the impacts will be mitigated as promised. Based upon the City's own reports, it is well within the City's power to explicitly address and incorporate the required mitigation strategies at the General Plan level. There is no justification in deferring the tough decision to a later date after the City has decided, through its new General Plan, to grow south across the best soils, or to presume mitigation will occur, when no definite strategy is set forth.

C-2-2

The EIR is Inadequate for Ignoring the Issue of Potential Impacts to Intersections.

The DEIR focuses only on the issue of road length segments, and ignores the other equally important component of traffic analysis: that being intersection movements. Interestingly, the General Plan background report at page 3-6 contains an analysis for existing (1995) Intersections Level of Service. This table shows two intersections are operating at a substandard level of service. Tables 4-5 and 4-6 reflect that traffic volumes will substantially increase for both alternatives, yet there is no discussion of the projected impacts to

C-2-3

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intersections. The DEIR's failure to study intersections may also explain why the Draft General Plan is silent as to any standards or policies for intersections (whereas, intersections were addressed in the 1988 General Plan [Exhibit 1] and EIR [Exhibit 2]). Therefore, the DEIR is inadequate for failing to acknowledge the likely impacts to intersections, and whether or not there is any basis for reducing those mitigating impacts.

A lay person reading the policy Plan or the EIR would likely presume that the only traffic concerns to be expected in the future are those set forth in the DEIR. This is, in fact, not the case. The City has current information regarding impacted intersections, and as a result, the EIR must contain an analysis of the likely impacts of growth. Attached to this letter are excerpts from City-generated environmental documents showing that there will be impacted intersections. [Exhibit 3 - Woodland Auto Park EIR; Exhibit 4 - Southeast Area EIR; Exhibit 5 - Woodland Wal-Mart EIR.] In light of the increased traffic resulting from new growth, these intersections and others that should be reviewed as part of a comprehensive traffic study must be included in the EIR.

C-2-3

(cont)

To add another perspective to this omission, there is attached to this letter a DEIR completed by the City of Fullerton as part of its General Plan Update. This Plan includes an extensive analysis of intersection operations internal and external to the City's boundaries [Exhibit 6]. General Plan EIRs for similar Central Valley communities also address intersection impacts. [Exhibit 7 - City of Vacaville; Exhibit 8 - City of Chico; Exhibit 9 - City of Lathrop; Exhibit 10 - City of Tracy; Exhibit 11 - City of Folsom.] The requisite standard of analysis has not been met.

Interestingly, the DEIR appears to have recognized the issue of congested intersections in the air quality section. To perform this analysis, the consultants logically identified those intersections that they thought would suffer from the greatest congestion whether as a result of traffic volume, intersection geometry or both. However, none of the methodology is set forth except an impenetrable discussion in Appendix D. Thus, the air quality analysis supports the conclusion that certain intersections would deteriorate sufficiently when compared to the rest

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that they were worthy of study. However, the public is left in the dark as to how and on what basis these eight intersections were studied, and not others.

The City May Not Make Traffic Impacts Become Less Than Significant By Merely Changing the Relevant LOS Standard.

At page 4-10, the General Plan concludes that impacts are less than significant, notwithstanding the explicit recognition that certain road segments will operate at a level less than C, the City's own standard for determining significance. (Background Document, page 3-4.) Apparently, the EIR confuses the City's discretionary authority under the State Planning Law to set its own standards for *planning purposes* with its duty to disclose to the public, pursuant to CEQA, as to whether or not the impacts of those policies are environmentally significant. Additionally, both Main Streets and Gibson Road are included in the County-wide congestion management system. According to the Yolo County Congestion Management Plan, level of service C must be maintained on those streets. (Background Document, page 3-17.) This conflict is not recognized. The impacts remain significant.

The traffic analysis also relies upon a yet to be completed Street Master Plan as an apparent form of mitigation. This form of deferred analysis, without the use of explicit performance standards, is not a form of valid mitigation for the purpose of mitigating impacts. This strategy was rejected by the appellate court in Sundstrom v. County of Mendocino (1988) 202 Cal.App.3d 396, and related cases.

Potential Impacts to Public Services are not Properly Disclosed or Mitigated.

The DEIR understates the impacts related to providing adequate City services under the Draft General Plan. Proposed policies for key services would permit the City to reduce the level of services in response to budgetary constraints. The lack of assured future funding

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mechanisms cannot support a conclusion that impacts will be mitigated to a level of insignificance. This bold assumption, unsupported by the EIR, impacts the following services: police, fire, library and parks.

The potential for a shortfall to park facilities, is even greater. The EIR presumes a level of land dedication that is flawed for two reasons. First, it exceeds the specific acreage limitations of the Quimby Act (Gov. Code § 66477). Second, it requires new development to fund existing deficiencies, a dedication in excess of the City's legal authority based upon the line of reasoning set forth in the Nollan, Dolan and Lucas decisions of the United States Supreme Court. For further background on this limitation, see Public Needs and Private Dollars (Solano Press) Chapter III, California Land Use Law (Solano Press) Chapter 14.

**The DEIR Offers Illusory Mitigation Techniques
As a Means of Mitigating Groundwater Impacts.**

At page 5-8, the DEIR concludes that the impacts to groundwater will be significant, but yet in the pages that follow, it suggests that the addition of two policies will reduce impacts to a level of insignificance. The document's authors conclude, without any analysis, that the measures set forth in italics on page 5-9 would reduce impacts a minimum of 400 acre feet for alternative 2, and 1900 acre feet for Alternative 1. The DEIR states "By implementing aggressive conservation and leak detection programs, however, the potential supply deficit could be eliminated." The document is devoid of any supporting analysis. There is simply no basis upon which a reader of the document can follow the drafter's analysis that impacts have been mitigated. The DEIR must be revised to set forth the basis for the analysis, and the public given an opportunity to review and comment.

In the same topical discussion of water impacts, the EIR sets forth a strategy for retrofitting all existing development for water conservation. The feasibility of such an approach is so remote that it cannot justify the conclusion that the impacts could be mitigated. A search of State of California records did not reveal any cities that had implemented a

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retrofit program at the level that would be necessary to serve the City of Woodland. Any person who reads the Sacramento Bee will tell you that California residents relying upon unmetered water have an aversion to mandatory retrofit programs. To implement such a program, the City would either have to charge the existing residents for the cost, or pay for it from general funds. There is no reason to believe that the existing residents will voluntarily pay this cost themselves, and given the City's financial position with \$500,000.00 in unfunded road maintenance, it is equally unlikely that the City will pay for the cost out of the general fund. As a result, it is clear that the General Plan will have an adverse impact on groundwater.

C-2-6
(cont)

The Draft General Plan contemplates construction of a golf course. During warm weather, a golf course will consume 1,000,000 gallons of water per day. Is this water usage accounted for in the new water demand numbers?

C-2-7

The DEIR should be clarified as to whether or not the impacts resulting from subsidence are significant. That is the clear implication from the text found on page 5-8, however, only groundwater supply is really addressed. Subsidence is a secondary consequence of overdraft, and is a distinct and separate impact, but its importance is editorially diminished.

C-2-8

Finally, this section needs to address other forms of mitigation such as groundwater recharge through reinjection wells, temporary dams, detention basins, or delivery of surface water to the agricultural community in order to decrease agriculturally-based groundwater pumping. These techniques are in operation elsewhere in California, and should be examined as part of this General Plan Update.

C-2-9

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The Discussion of Waster Treatment is Deficient.

C-2-10

Three alternatives to treatment are set forth in the DEIR. Nowhere is there any comparative environmental evaluation of the three alternatives, nor is there any discussion of the impacts associated with the expanded operation of the existing plant (e.g., downstream discharge, odor). As such, the residents cannot evaluate the probable environmental consequences of community expansion. To conduct the analysis *after* the Plan is adopted as part of a wastewater master plan defeats CEQA's objective of requiring a good faith disclosure at the earliest possible time. Increased wastewater treatment is a component part of the project, and must be analyzed now. (See San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus (1994) 27 Cal.App.4th 713.

It is also necessary to add that in June of 1995, the City raised concerns regarding chlorine gas risks from plant operation. The City's consultant identified potential health and safety zones around the plant, and there was testimony that a prior gas leak almost closed Highway I-5.

C-2-11

CEQA does not permit the City to have it both ways. Continued and expanded operation of the existing plant will result in increasing transportation and handling of chlorine gas. As a result, there is a corresponding increase in health and safety risks. A risk analysis, with the attendant environmental consequences and appropriate mitigation techniques to perfect surrounding activities such as I-5, must be discussed. The DEIR should also examine mitigation techniques such as gas containment equipment, non-chlorine based treatment strategies (e.g., ultraviolet light), as well as alternatives such as pond relocation. After this analysis is completed, the City will be able to reach a conclusion regarding the environmental effects of plant expansion (noting that the DEIR now only sets forth an environmental conclusion regarding the laying of pipeline [page 5-16]).

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The City Has Improperly Deferred or Ignored Impacts to Wildlife Habitat.

The DEIR generally describes, but fails to quantify impacts to habitat loss. While reliance on an adopted HCP may constitute a form of mitigation, the reliance on one which has not been finalized, much less adopted by the requisite jurisdictions, is not a substitute for the City conducting the required level of analysis. The EIR itself recognizes that the HCP may not be adopted, and then, in lieu of analyzing the impacts of the proposed Plan and how those impacts may be mitigated, shortcuts the process by concluding that the impacts would be significant. There is no discussion of how the City on its own might address mitigation, something that would well be within the City's police power.

C-2-12

Even if a reader wanted to read the HCP as the City's substitute mitigation process, it is not attached as part of the EIR, or referenced as to its availability. See CEQA Guidelines §§ 15148 and 15150.

The Consequences of Increased Urban Stormwater Discharge Must Be Discussed.

The EIR contains a discussion of stormwater runoff. However, it cannot be ascertained as to whether or not there will be increased downstream discharge, and what would be the environmental consequences of increased urban runoff into the surrounding waterways. Runoff is a necessary component of new urbanization and is analogous to the expansion of the sewer treatment plant required by the appellate court in the San Joaquin Raptor case cited above.

C-2-13

The DEIR Fails to Evaluate the Potential Flood Effects On Industrial Development Within the 100-Year Floodplain.

The policies of the Draft General Plan set forth in the DEIR discussion, permit the siting of industrial land uses in the 100-year floodplain without substantive mitigation if flood depths are less than 4 feet (page 9-9). While the Draft General Plan policies require the

C-2-14

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floodproofing of structures in flood inundated zones, materials and equipment within such areas and in outdoor storage areas are not similarly protected. During a flood event, stored hazardous materials and wastes could be mobilized and/or spilled. Given the concentration of industries potentially using such materials in the Woodland area, this could result in a public health hazard that should be evaluated in the DEIR as a secondary impact of flooding and industrial development in the floodplain.

C-2-14
(cont)

The DEIR Fails to Evaluate Meaningful Alternatives to the Proposed Draft General Plan that Would Reduce the Impact of Increased Traffic Noise on Existing Land Uses.

The DEIR at page 9-27, rightfully concludes that increased traffic noise as a result of urban development pursuant to the Draft General Plan, would be a significant impact. Given the difficulty in retrofitting noise mitigation measures in existing land uses, there is agreement that there are no feasible mitigation measures to reduce the impact to a less than significant level. However, CEQA demands more. Section 15126(d) requires the discussion of alternatives to the proposed project which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or be more costly. Development to the east would avoid impacts to the existing community as a result of development to the south. This further argues for a detailed study of an eastern growth alternative.

C-2-15

The Alternatives Analysis is Incomplete.

Section 15126 of the Guidelines sets forth the applicable legal standard for the preparation of alternatives. By previous correspondence, my clients submitted their suggested alternative for consideration by the City. However, this alternative was dismissed from further serious review based upon dubious grounds. First, as noted elsewhere in these comments, the flood risk east of Road 102 is not materially different from that in the Southeast Area, and is the same information available to the City at the time of the 1988 General Plan which opened up the Southeast Area to development (compare the mapping of

C-2-16

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C-2-16
(Cont)

the DEIR to Figure 4-5 of the 1988 General Plan EIR). The DEIR mentions the possibility of lands reverting to Williamson Act contract, a foundation for rejection which has no legal basis whatsoever, and no factual basis in the record. Previous comments by PG&E Properties outlined that there was no supporting grounds for the proposition that the prior federal grant posed a limitation on the relocation of the ponds, and that supposed limitation has never been studied and presented to the public, other than the report initially released on the morning of the City Council's action to reject a full study of the east alternative. Essentially, a series of artificial constraints were created as the basis as why there should not be a bonafide study of the East Area. The City's approach thus improperly constrained the alternatives that should have been studied.

While there is comparative discussion of the various alternatives, the DEIR contains numerous conclusions, not supported by any information in the record, to then dismiss the eastern growth alternative. This lack of credible analysis includes the following:

C-2-17

Page 10-7: "Given the City's investment in the wastewater treatment plant, it is not considered a feasible option to relocate this facility" (see also page 10-13) "..... [d]evelopment of this area would probably depend a great deal on Sacramento for many of its community services and activities, rather than on Woodland's Downtown and commercial services..." (Comment: It is interesting to note that the same conclusion should have been reached in the Southeast Area Plan, but was not).

C-2-18

Page 10-8: "The location of development adjacent to rice fields to the east would probably make it infeasible to continue adjacent rice farming because of the nature of the crop operations..." (Comment: Elsewhere in the DEIR, the City believes that there will be adequate buffering, but not here. There is no evidence in the record to justify a different conclusion for the East Area as there is for the preferred alternative?.

C-2-19

Page 10-10: "A new interchange would probably be required, which would be more costly than the transportation improvements expected under the other alternatives."

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C-2-20

Page 10-12: "Development of the water delivery system would be more difficult, however, because the high water table in the area would make it more difficult to ensure integrity of underground pipes." (Comment: utilization of wells in this area would have less of an impact on agricultural operations located south of the City which rely upon groundwater.)

C-2-21

Page 10-17: "The Eastern Growth alternative would result in the greatest loss of wetland areas, including vernal pool areas."

As noted above, none of the foregoing conclusions are substantiated by the DEIR, and are an insufficient basis for rejecting the feasibility of an alternative. See Guidelines § 15091.

C-2-22

In light of the City's early rejection of an Eastern growth option, the City, in order to set forth alternatives which meet the basic objectives of the project while at the same time avoiding the impacts, was required to address another southern growth alternative. The need for this option was vividly demonstrated during the joint Planning Commission/ City Council meeting of November 28, 1995, in which southern growth options of lower growth rates, subdivision or permit allocation and higher density were readily identified. The City's response to these inquiries was that there was time to respond to these issues out of fear that the EIR document might have to be recirculated. (The proposed response of using the Specific Plan as a phasing device lacks any quantifiable benefit or mitigation.) This begs the question of whether or not the DEIR should have included those options at the outset.

Essentially, the studied range of alternatives was too narrow. A review of the chart in Chapter 10 illustrates that for virtually all purposes, the no-project and the existing General Plan alternatives are the same, as are the two southern growth options when compared to each other. Thus, the choices presented to the public were essentially two; no growth or high impact to prime agricultural lands. The public was not given a choice of alternatives which could mitigate the identified impacts. CEQA requires a *range* of alternatives, not a choice of two, and in fact, since the no growth/ existing General Plan alternatives are environmentally

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superior, the City is obligated pursuant to § 15126(d)(4) to identify another environmentally superior alternative. This was not done.

OTHER GROUNDS OF INADEQUACY

C-2-23 { Guidelines section 15124(d)(1) requires the discussion of intended uses of the EIR, including what agencies will use the EIR, and for what approvals the EIR will serve. The fourth full paragraph on page 2, insufficiently touches on these subjects.

C-2-24 { Impact Summary: The summary is deficient by not listing all of the required topics of 15123(b), including areas of controversy or issues to be resolved, by not listing all significant impacts, and by not listing mitigation measures or alternatives which could avoid or reduce significant impacts.

C-2-25 { The density assumptions of Table 2-2 are not substantiated in the EIR. Only by studying Appendices A, B and C, can one determine the rationale for the density assumptions. The ultimate assumptions used in the EIR presented in Table 2-2, conflict with the densities established in the study presented in Appendix A, Table 2.

Thank you for considering the above comments. I look forward to reviewing the Final EIR.

Sincerely,



William W. Abbott

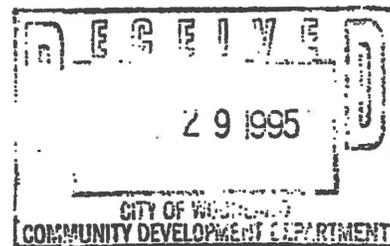
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Bert C. Bangsberg
Vice President-Development



**PG&E
Properties, Inc.**



November 29, 1995

HAND DELIVERED

Ms. Janet M. Ruggiero
Community Development Director
City of Woodland
300 First Street
Woodland, California 95695

Re: Draft Environmental Impact Report - City of Woodland Draft General Plan

Dear Ms. Ruggiero:

On behalf of the Conaway Conservancy Group, the owner of the Conaway property and the Conaway Ranch, we have reviewed the DEIR and have the following comments thereto. All page references are to the DEIR. A portion of the Conaway property on the Conaway Ranch is located within the Urban Reserve Area and the "Eastern Growth Alternative" as described in the above-referenced Draft Environmental Impact Report ("DEIR").

1. General Comment.

In general, we believe the DEIR fails to provide a thorough, objective analysis of facts relating to this General Plan process. Such analysis is not only required by applicable law, but it is also absolutely necessary in order for the City Council and Planning Commission to be able to make an informed decision on the Woodland General Plan. All too often it appears that the DEIR provides nothing more than a post hoc rationalization for the approval of Alternatives 1 or 2, both of which would cause Woodland to grow to the south into areas of prime agricultural land. Identification and analysis of other growth alternatives is limited and dismissal of these other alternatives, especially the Eastern Growth Alternative, is often based on conclusory statements unsupported by any factual analysis. With particular respect to the Eastern Growth Alternative, the very detailed and thorough body of information submitted by Conaway Conservancy on June 15, 1995 in response to the Notice of Preparation of the DEIR appears to have been completely ignored by the preparers of the DEIR. This fact alone raises doubts as to the credibility of the DEIR analysis.

C-3-1

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For these reasons, as more detailed in our specific comments below, we believe the DEIR must be extensively revised and then recirculated for additional public comment. Once revised consistent with applicable law, we believe that a true, objective analysis of the relevant facts will show that the Eastern Growth Alternative, while it too will have environmental issues with which to contend, will nevertheless be the environmentally superior growth alternative for the City of Woodland.

C-3-2.

Pages 2-3. (Program EIR).

The DEIR purports to be a first tier EIR, a program EIR, and a master environmental assessment. A program EIR is inappropriate under the holding of *Al Larsen Boat Shop, Inc. v. Board of Harbor Commissioners* (1993) 18 Cal.App.4th 729.

C-3-3.

Page 1-3. ("Hybrid" Alternative).

The DEIR states that one of the two residential growth alternatives or a hybrid will be selected by the City Council after the public review process but prior to adoption of the General Plan. This statement compromises the CEQA process by essentially stating that the City Council does not intend to consider any other alternative to the project, even one which might be raised during the comment period. Furthermore, should the Council select a hybrid, the environmental impacts of the hybrid should be documented in the final EIR prior to adoption of the hybrid.

C-3-4.

Page 1-3. (Wastewater Treatment Plan Relocation).

The DEIR states here and on many other occasions that the cost to relocate the main wastewater treatment plant precludes its relocation. However, nowhere in the DEIR are the facts supporting this conclusion stated or explained. Since we, and presumably other members of the public believe that it is feasible to relocate the main wastewater treatment plant or material portions thereof during the timeframe of the General Plan, the DEIR should set forth the facts upon which it contends that it is infeasible to relocate the plant. These facts must be fully substantiated and based on objective information.

C-3-5.

Page 1-5. (Flood Mitigation).

The DEIR acknowledges that existing development and existing zoned but undeveloped land currently is at risk to flooding. However, the only mitigation measure identified by the DEIR to minimize these risks is to change the zoning of a relatively small portion of property within the City from residential to non-residential. There is no

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discussion in the DEIR, to any meaningful degree, of other potentially feasible mitigation measures. Significantly, the DEIR nowhere states or discusses measures which might need to be taken in order to strengthen the Cache Creek levee system. There obviously exist feasible mitigation measures as such are used throughout the Sacramento Valley; these measures must be considered.

C-3-6.

Page 1-5. (Growth Alternatives).

The DEIR states that there are constraints to growth to the north, west, and east. However, nowhere in the DEIR are these constraints fully discussed, especially in the case of growth to the east and west.

C-3-7.

Page 1-12. (Housing Element).

The General Plan DEIR inadequately summarizes the Housing Element. Section 15150 of the State CEQA Guidelines requires that when incorporating by reference, "... the incorporated part of the referenced document shall be briefly summarized." The General Plan DEIR only refers the reader to the existing 1993 Housing Element with no summary of its contents. Section 15150(b) of the State CEQA Guidelines specifies that "... [w]here part of another document is incorporated by reference ... the EIR ... shall state where the incorporated documents will be available for inspection." There is no mention in the General Plan DEIR of where the 1993 Housing Element can be found. The DEIR only states that the Housing Element is "... available under separate cover". Last, as noted in Section 15150(d) of the State CEQA Guidelines, the state identification number of the Housing Element should be included in the DEIR summary; such is not the case for the General Plan DEIR.

3-3-8.

Page 1-15.

There is an obvious omission at the end of Chapter 7.

C-3-9.

Page 1-16. (Alternatives).

For a variety of reasons set forth in this letter, we believe the Project Alternative Section is inadequate and does not meet the standards required by CEQA.

C-3-10.

Page 1-16. (Alternatives).

The DEIR summary is required, according to Section 15123(b) of the state CEQA Guidelines, to present the significant effects along with proposed mitigation measures and alternatives to the proposed project that would reduce significant impacts. Section

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1.10 of the General Plan DEIR summary does not present any discussion of mitigation measures or alternatives to reduce potentially significant biological resources impacts. Also, some discussion of Alternative 2 is mentioned in the summary with regard to the reduction of significant environmental impacts. However, there is clearly no summary of the potential reduction of many significant environmental effects that would result with the Eastern Growth Alternative. In particular, an evaluation of the potential reduction in the significance of the loss of prime farm land with the Eastern Growth Alternative should have been presented, as well as reductions in groundwater reliance. In effect, this shows a pre-judgement by the DEIR preparers that the Eastern Growth Alternative, a reasonable alternative capable of meeting basic project objectives while substantially reducing significant effects, is not being seriously considered. Thus, the City Planning Commission and City Council is being deprived of a full disclosure of potentially feasible alternatives that meet the project objectives and reduce impacts. The summary also does not discuss Areas of Controversy known to the Lead Agency, in accordance with Section 15123(b)(2) of the State CEQA Guidelines, or Issues to be Resolved as specified by the state CEQA Guidelines Section 15123(b)(2). In fact, although mandated sections of a DEIR, these items are not found anywhere in the document.

C-3-11.

Page 1-16, (Alternatives to Impact on Prime Agricultural Land).

Alternative 1 and 2 are really not alternatives as defined under Guideline Section 15126. CEQA requires that the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly. The primary unmitigated significant environmental impact associated with Alternatives 1 and 2 is the loss of prime agricultural land. Yet the difference between these two project alternatives from the standpoint of impact on prime agricultural land is only 188 acres, that is, Alternative 2 impacts only 188 acres less prime agricultural land than does Alternative 1, a less than 10% difference. This certainly does not constitute avoidance of an impact under Section 15126 and it certainly does not constitute a substantial lessening of the significant impact.

C-3-12.

Page 1-17, (Growth Inducing Impact on Additional Prime Ag Land).

The DEIR discusses additional pressures to convert prime agricultural land to urban development under Alternative 2 but does not identify any such impacts with respect to Alternative 1, at least in the impacts that are significant. The distinction between Alternative 1 and Alternative 2 in this regard is not meaningful. In each case, urban development borders prime agricultural land. Under Alternative 2, urban development

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would border agricultural land on an additional side, but that side is separated by a major highway, not an uncommon situation. We believe the final EIR should acknowledge that both Alternative 1 and Alternative 2 would result in additional pressure to convert prime agricultural land to urban development.

C-3-13. Page 1-17. (Traffic and Water Supply). - See additional comments below.

C-3-14. Page 1-18. (Loss of Habitat and Noise). - See additional comments below.

C-3-15. Page 2-5. (Land Use Density Assumptions).

The DEIR lists density assumptions for development. An allowable range of development density is shown, and an "in-between" density is selected as the basis for analysis of the General Plan DEIR. For instance, the "rural residential" land use designation in the Woodland General Plan allows development of 0.0 to 2.0 dwelling units per acre. The DEIR assumes 1 unit per acre. The General Plan allows a range of between 3.0 and 8.0 units per acre and the DEIR selects 5.0. The DEIR does not substantiate how these assumptions were derived. Are they based on land costs? Availability of parcels for development? The DEIR states only (at page 2-3) that densities were adjusted down from the maximum allowable "... based on historic experience that indicates most land will not develop at its maximum allowable intensity because of market forces, parcel-specific site constraints, regulatory constraints (e.g., zoning), and other factors." How do these factors relate to Woodland, and to the parcels that could be developed under the Draft General Plan? What will happen in the future as land values rise? Aside from this statement, no analysis is provided to support the densities selected. This is a critical issue in that it addresses land absorption assumptions and the ultimate level of physical disturbance, which in turn leads to greater or lesser environmental impact. The City has not demonstrated that the assumptions it is using are reasonable and foreseeable.

C-3-16. Page 2-6 through 2.8. (Supply of Land).

Other than an allowance for a small vacancy rate (5%), the DEIR does not, but should make allowance for the fact that not all land in the new growth areas will be available for development at any given time. In order to meet housing demands, most general plans and the environmental analysis of those plans, acknowledge that some amount of oversupply of housing or land for housing is necessary in order to meet housing demand at any given time. Without an oversupply, and such a limited choice of available sites, a monopolistic effect is possible, the consequence of which is higher housing prices. This impact, unless mitigated, is potentially significant.

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C-3-17. Page 2-9, (Buildout Impacts).

We applaud the City's desire to ensure that a wide range of parcel sizes and locations is available for future industrial development to encourage economic development. However, the DEIR simply assumes that the entire amount of this land will not be developed by the year 2015 and therefore does not analyze the consequences of buildout of this land. Since the land is zoned and available for development, CEQA requires analysis of buildout of these non-residential lands. This impact analysis should be revised to reflect buildout of these lands.

C-3-18. Page 3-2, (Development Projections; Impact Analysis).

Again, the analysis here assumes that development will occur consistent with the projections described in Chapter 2 of the DEIR. For the reasons stated above, we believe the projections are flawed. Furthermore, the preparers of the DEIR selectively reference thresholds of significance set forth in Appendix G of the CEQA Guidelines. There are many other standards of significance set forth in Appendix G. We believe the preparers' selection of only two of the over twenty standards of significance set forth in Appendix G is further evidence of a prejudgment by the preparers of the EIR that the Eastern Growth Alternative will not be seriously considered.

C-3-19. Page 3-3, (Alternatives; Density of Development).

Given that the General Plan only sets forth a PN designation for the major areas of planned new residential development, and given that the DEIR acknowledges that specific plans will be required to determine the location and mix of land uses, how can the General Plan and the DEIR assume only one estimate of total housing units in the new growth areas (Chapter 2)?

C-3-20. Page 3-6, (Supply of Land).

The DEIR acknowledges that the rate at which vacant land within the proposed urban limit line will be developed will largely be determined by market forces. This supports our contention set forth in comment #15 above.

C-3-21. Page 3-6, (Urban Reserves).

The DEIR does not adequately discuss the meaning of "urban reserve" in the context of the General Plan.

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C-3-22.

Page 3-7. (City/County Development Agreement).

The General Plan DEIR states that the proposed General Plan includes a policy and program to amend the existing City - [Yolo] County Urban Development Agreement to allow for an adjustment in the Urban Limit Line. It further states that an amendment would be necessary to the Yolo County General Plan within the Urban Limit Line to accommodate the proposed Woodland General Plan. As the DEIR indicates, the amendments would be necessary because the proposed Woodland General Plan expands the Urban Limit Line beyond what is contemplated and adopted in the City-County urban Development Agreement; and in the Yolo County General Plan. The General Plan DEIR concludes that a less-than-significant impact to planned land use would result with the proposed project because the amendment is assumed to be acceptable to Yolo County, and assumed to occur at some point in the future. Yet, there is no indication that Yolo County was contacted in this regard, that the agency would support such amendments, or that those actions would occur. Therefore, the basis for the less-than-significant conclusion has not been adequately addressed or verified, and is not supported. The DEIR should therefore conclude, absent confirmation to the contrary, that this impact is significant and may be unavoidable.

The DEIR also states that the proposed General Plan is generally consistent with the overall goals of the 1988 Woodland Area General Plan, and the Yolo County General Plan. However, no analysis (e.g., policy consistency, land use plan comparisons) of the Yolo County General Plan land use or agricultural policies are provided in the Woodland General Plan DEIR to support this conclusion. Again, no substantiation has been provided in the DEIR for the less-than-significant impact conclusion related to Change in Planned Land Uses. Without substantial evidence, this finding is conclusory. The DEIR must conduct an analysis of Yolo County environmental goals and determine the consistency of the project. The DEIR should be recirculated after this analysis such that the public is afforded the opportunity to review the significance of this impact and to review any new mitigation measures. Certainly, if this analysis results in finding new significant impacts, recirculation of the EIR will be required.

C-3-23.

Page 3-7. (Existing Physical Conditions; Mapping).

A general description of the existing land use character (e.g., land use pattern, acreage) is provided in the Draft General Plan Background Report (September 1995). However, the location of existing land uses in the City or Urban Limit Line is not indicated on a map in either the Background Report or the General Plan DEIR. Section 15360 of the State CEQA Guidelines defines the environment as "... the physical conditions which exist within the area which will be affected by a proposed project...". Section 15124 of the State CEQA Guidelines specifies that the "... precise location and boundaries of

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the proposed project shall be shown on a detailed map..." in the Project Description. Yet, the DEIR concludes that "[d]evelopment according to the Draft General Plan would not substantially alter the land use patterns of the community, but will generally build upon and expand the existing land use pattern." Without a map of existing developed land uses, how can an adequate assessment of the changes that would occur with the proposed project be made? How can the less-than-significant conclusion be demonstrated in the DEIR regarding the change in the Physical Arrangement of the Community without a map of the existing land uses upon which to make the evaluation, and to reach this determination? Again, the analysis is conclusory and must be supported by substantial evidence.

In fact, a map of the existing land uses should also be the basis for evaluating any physical changes to the environment with the proposed project including transportation and circulation, infrastructure (i.e., water, wastewater, storm drainage, utilities), agriculture, recreational facilities, historic/archaeologic resources, environmental resources (i.e., water, mineral, vegetation) seismic and geologic conditions, and flooding. Without such a map, physical changes are not demonstrable to the public or decision-makers.

C-3-24.

Page 3-10, (Impacts on Prime Ag Land).

Page 3-10 specifies that conversion of prime agricultural land within the existing Woodland Urban Limit Line was not considered an impact attributable to the Draft General Plan. Yet, in the analysis of alternatives, the DEIR considers conversion of this area to be a significant impact of several of the alternatives. In fact, the DEIR considers the No Project Alternative - 1988 General Plan and Eastern Growth Alternative to be significantly impacting agriculture, strictly because they develop this same area that is not considered to be significant for the project. This provides a post-hoc rationalization to reject alternatives such as the Eastern Growth Alternative, which are clearly environmentally superior to the proposed project but are nevertheless labeled as significant through the inconsistent application of standards. Clearly, if development of prime farmland within the Urban Limit Line is not considered to be a significant impact of the proposed project, this same criteria must apply to alternatives. And if applied to the alternatives, no significant agricultural impacts would be attributed to the Eastern Growth Alternative.

C-3-25.

Page 3-10, (Alternatives: Industrial Development).

The northwest industrial area is acknowledged as prime agricultural soils and is acknowledged as being in the floodplain. Yet the DEIR does not examine any alternatives to designating other land in the City which is not on prime agricultural soil

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for industrial development. Such development, for example, could serve as an excellent buffer to the wastewater treatment plant in the eastern portion of the City.

C-3-26. [Page 3-11. (Impacts to Prime Ag Land).
See comment #23 above.

C-3-27. [Page 3-15. (Alternatives to Impact on Prime Ag Land).
See comment #10 above.

C-3-28. [Page 3-15. (Performance Standard for Land Use Buffers).
A specific performance standard for buffering cannot be deferred, and therefore, crucial mitigation of potential impacts on adjacent agricultural lands cannot be deferred to subsequent plans or EIR's. The specific mitigation required in order to reduce this impact to a less-than-significant level must be identified and the DEIR must be recirculated in order to allow interested members of the public to comment on this specific mitigation.

C-3-29. [Page 3-15. (Growth Inducing Impact on Additional Prime Ag Land).
See comment #11 above.

C-3-30. [Page 3-16. ("Permanent" Urban Limit Line).
The DEIR should acknowledge that no urban limit line is truly "permanent" in nature and could be changed by subsequent general plan amendments.

C-3-31. [Page 3-17. (General Plan Impact Analysis).
In general, the General Plan DEIR states the proposed General Plan goals, policies, and programs related to specific environmental issues under evaluation. However, there is little or no analysis of how the policies affect, prevent, or reduce environmental effects of development under the proposed project. For example, in the analysis of Housing impacts, there is no discussion of how proposed Policies and Programs are consistent, or not, with those of the adopted Housing Element (the threshold used in the DEIR). Instead, the DEIR provides a conclusory statement that "[t]he Draft General Plan is consistent with the adopted Housing Element and provides for job-housing balance by 2015." That statement, along with one other sentence constitute the entire analysis upon which to base the less-than-significant conclusion in the DEIR with

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regard to proposed project impacts on housing. This conclusion is not supported by the facts in the record.

C-3- 32.

Pages 3-16 through 3-20, (Housing Element).

The relationship between the adopted 1993 Housing Element and the proposed project is unclear.

The Introduction and Project Description in the DEIR present conflicting information regarding the relationship of the Housing Element to the proposed project. On page 5 of the Introduction, the DEIR states that an evaluation of the land use, housing, and population impacts of the proposed plan is presented in the DEIR. Section 1.2 of the Project Description and Summary identifies Chapter 2 of the Draft Background Report, considered part of the DEIR, as the existing housing conditions (stated again on page 1-9). Section 1.6 of the DEIR notes that one of the changes from the prior to proposed General Plan includes a "... higher population and employment holding capacity" and alters the "... system for phasing residential development."

Yet, on page 1-12 of the DEIR, statements are made that the Housing Element was updated recently (1993) and was not being updated for this General Plan..." Is the Housing Element part of the proposed project? If so, why is there no analysis of the 1993 Housing Element policies with regard to increased population and housing contemplated under the proposed project? If the Housing Element is not part of the proposed project, where is the evaluation of housing impacts claimed to be included in the DEIR on page 5, in Section 1.2, and in Section 1.6? The DEIR must include this analysis and any resulting impacts must be clearly identified.

C-3- 33.

Pages 3-16 through 3-20, (Housing Affordability).

Page 3-16 of the DEIR indicates that "[t]he existing housing and population characteristics ... are summarized in Chapter 1 of the Draft General Plan Background Report and the 1993 Housing Element." Table 1-12 of the Draft General Plan Background Report provides a general indication of vacant land in the City of Woodland. It indicates that approximately 437 acres of vacant residential land is available, and appears to indicate that 404 of these acres have already been approved for development. The Draft General Plan Background Report does not further divide the vacant residential land inventory into density (i.e., rural residential, very low density residential, low density residential, medium density residential), or affordability categories. In contrast, Appendix A of the DEIR provides a discussion of approved and available housing units, without regard to acreage. Appendix A indicates that approximately 2,760 dwelling units could be built in the City, given current approvals,

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including 2,400 of which would be located within the boundaries of the Southeast Area Plan. How do the vacant acres of land relate to the existing unbuilt housing inventory within the City? What is the existing condition with regard to housing? Where is the vacant land for housing located?

The Projected Housing Needs discussion of the 1993 Housing Element, which is to be produced as part of the Woodland General Plan upon its adoption, states that "[a]s with most jurisdictions, however, the problem [of the future provision of housing] isn't always the housing supply but how much it costs consumers and its affordability." How does the proposed General Plan impact the provision of housing affordability through year 2015?

The Distribution of New Residential Units by Residential Category provided in Appendix A of the General Plan DEIR was "stabilized" to more accurately reflect anticipated future market conditions. The stabilization process used in the Appendix A of the General Plan DEIR relies on an analysis of historic data, city policy, and consideration of comments from local brokers. The Appendix states the factors considered in stabilizing the residential distribution. Item 4 of the factors states that "[t]he potential distribution of new housing units was computed based on the estimated current distribution of household income in Woodland and on assumptions regarding housing afford ability" [emphasis added]. What are the affordability assumptions used? How do they relate to the proposed project?

C-3- 34. Page 3-17, (Development Assumptions).

The basis for the development assumptions used in the General Plan DEIR is the Sacramento Area Council of Governments (SACOG) projections. As stated in Appendix A, these projections are still "tentative" at this time. The Appendix also states that assumptions used to formulate the 1993 SACOG projections, and the basis for the updated 1995 edition used in the General Plan DEIR, may change as the revised projections are generated, although the magnitude of the changes would not appreciably change growth forecasts for regional areas within the projections. What is the basis for the comment that the possible "change" in assumption would not result in appreciable modifications to growth projections in the region?

Areas within the three counties of Yolo, South Sutter County, and Sacramento County are the jurisdictions identified in the surrounding region for which assumptions are not anticipated to appreciably change. The portions of the counties considered in the SACOG projections are large, dynamic regions. The potential for changes in their patterns, intensity, type, or rate of growth to be appreciable cannot be simply discounted. Much of the development in north Natomas, for example, is assumed to

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be developed after year 2010; however, the North Natomas Area Plan was recently approved by the City of Sacramento, allowing development to proceed within a five year timeframe or less. In Sutter County, litigation casts a strong doubt over whether any substantive residential development will ever be provided in the South Sutter area; the assumption that the area will ultimately experience "significant growth" (tens of thousands of new residents) is very likely to be incorrect and this would dramatically affect development pressures in the region, including Woodland, in order to meet growth projections.

C-3-35. Page 4-1, (State Highways; Connection Between I-5 and SR 113).

The Environmental Setting Section of Transportation and Circulation is incomplete in several respects. For example, the document summarizes the results of a comprehensive traffic count program/level of service analysis for City streets. No data has been provided, however, for the State highways passing through the City. The document also describes "critical accident rates" and identifies those locations experiencing higher than critical rates. However, the supporting data in Tables A-5 and A-6 is missing. Finally, the document briefly summarizes the route connecting SR 113 with Interstate 5 and the use of local surface streets for this connection. The document then states that "Caltrans and the City have discussed a number of preliminary alternatives that would provide a direct link from SR 113 to southbound Interstate 5." The document should indicate that Caltrans has in fact completed the 1992 Project Study Report addressing this connection and that the City is currently pursuing a supplemental PSR addressing additional alternatives, including the development of new or enhanced freeway connections. The DEIR should also describe the alternatives being evaluated. This is significant new information which will require recirculation of the DEIR.

C-3-36. Page 4-3, (Threshold of Significance - Traffic Impacts).

The threshold of significance as stated on page 4-3 does not comply with Appendix G of the Guidelines. In particular, in the case of infill areas or within 1/2 mile of state or federal highways, there does not appear to be any level of service standard required by the General Plan. Following this approach to its logical conclusion, there could never be a significant adverse impact in any infill area or within 1/2 mile of the state or federal highway under the thresholds of significance set forth on page 4-3. Again, this does not comply with Appendix G of the CEQA Guidelines. The preparers of the DEIR cannot mitigate a significant impact by lowering a performance standard. These impacts are significant and unmitigated. Recirculation is required.

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C-3-37.

Page 4-3, (Supporting Traffic Data).

The DEIR is predicated on the results of several runs of the Woodland MINUTP model. However, only limited summary information from each model run is presented, and only for those locations where impacts have been suggested. No supporting traffic volume information is provided for those locations where the DEIR preparers have concluded that the City's LOS "C" standard is met. Supporting information similar in detail to that provided in Figure 3-2 of the Background Report should be available in the DEIR.

This lack of information extends to Interstate 5 and SR 113. Information describing impacts to these facilities was requested in Caltrans' response to the Notice of Preparation of the DEIR. The DEIR ignores this request. CEQA requires a meaningful response.

C-3-38.

Page 4-5, (Impacts to I-5/Road 102 Interchange).

The documents suggests that County Road 102 will need to be widened to six lanes from Beamer Road to Gibson Road. The document should disclose that this improvement will likely necessitate reconstruction of the Interstate 5/ County Road 102 Interchange, a project that is not identified in the DEIR.

C-3-39.

Page 4-6, (New East/West Arterial - Impacts).

The document suggests that a new east/west arterial street will be needed south of Gibson Road. The road is shown to be along the alignment of County Road 24C and will cross but not be connected to SR 113. While no traffic volume information is provided, the document suggests that this road will need to be four lanes wide. Interpolation of traffic volumes provided for other east/west streets suggests that the County Road 24C crossing may carry 22,000 average daily trips. The DEIR should indicate that the new road would conflict with at least one of the Interstate 5 / SR 113 connection alternatives presented in Caltrans 1992 PSR. The new road appears to cross SR 113 in the approximate locations of the ramps for Alternative 3A.

C-3-40.

Page 4-6, (Main Street Traffic Impacts).

The document suggests that Main Street in the vicinity of SR 113 will not necessarily be mitigated to LOS "C" by the implementation of identified improvements. However, the document suggests that this area is currently the subject of a Project Study Report to improve the connection between Interstate 5 and SR 113. The document also concludes that "An improved connection will substantially reduce through traffic from

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this section of Main Street, which currently serves as the main connection between these two freeways".

This conclusion is not supported by any factual information contained in the DEIR, as the document presents no information regarding forecast volumes on either state highway, nor for the connector.

The 1992 Caltrans PSR addressing the Interstate 5 / SR 113 connection indicated that travel between the two freeways occurs on both Main Street and on Gibson Road - County Road 102. The level of improvements identified for County Road 102 in the DEIR effectively replicates Alternative 4 from the Caltrans 1992 PSR. Thus, the traffic model may already be diverting traffic to this alternative route. If this is the case, then additional reduction in Main Street traffic may not occur.

The DEIR should include a factual analysis, including model runs, to address the amount of traffic that may be diverted from Main Street due to a new connection. The resulting impact should be identified.

C-3-41. Page 4-6, (Traffic Impacts - Mitigation).

In both the case of significant adverse impacts to Main Street and significant adverse impacts to Gibson Road, the DEIR fails to identify feasible mitigation measures to mitigate these impacts to a less-than-significant level and instead, improperly attempts to defer any serious discussion of mitigation to future planning efforts. The DEIR must identify such mitigation and cannot simply hope that such mitigation is identifiable or achievable in the future.

C-3-42. Page 4-10, (Main Street Traffic Impacts).

Again, the impacts on Main Street cannot be explained away as "less-than-significant" simply by changing the level of service standard.

C-3-43. Page 4-11, (Main Street Traffic Impacts).

Again, the Main Street impacts are significant and not mitigated simply by changing the level of service standard. Appendix G of the CEQA Guidelines requires that this impact be identified as significant. Guideline Section 15088.5 requires recirculation.

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~~C-3~~ 44. Page 4-11. (I-5/SR 113 Connection).

The connection between Interstate 5 and SR 113 appears to be required in order to adequately mitigate several project impacts. Yet, there is no performance standard related to the construction of this improvement. The discussion of the mitigation measures on page 4-11 appears to assume that this connection will be financed and completed. This assumption cannot be made; additional discussion and analysis is required to show source of financing and assurance of construction.

~~C-3~~ 45. Page 5-3. (Water - Conservation Programs).

The DEIR assumes a 5% - 10% reduction over average demands to reflect conservation programs. However, conservation programs are not specifically identified and for CEQA analysis purposes cannot be relied upon to produce the described reduction.

~~C-3~~ 46. Page 5-3. (Buildout Impacts).

Table 5-2 and the accompanying discussion correctly shows and analyzes buildout impacts. The balance of the DEIR, inappropriately fails to analyze buildout impacts. For example, the traffic model does not assume buildout of the industrial areas. See comment #16 above.

~~C-3~~ 47. Page 5-4. (Ag Water Demand).

The DEIR does not reflect whether the current agricultural water demand reflects government programs which cause land to lie fallow in any given year. Was this fact taken into consideration? And if so, to what extent?

~~C-3~~ 48. Page 5-9. (Surface Water; Feasibility).

The DEIR states that new surface water supplies are expensive to implement and therefore, it is not assumed that the surface supply will be available to reduce potential impacts in the near future. The DEIR lacks any analysis of this contention especially in light of other evidence which has been submitted into the record. This discussion is inadequate; it is our contention that the surface water supply is available and can be feasibly implemented. See our comments to the Notice of Preparation submitted on June 15, 1995.

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C-3-49.

Page 5-9, (Groundwater; Proposed Mitigation).

There is no evidence or data presented to support the contention that the mitigation measure identified on page 5-9 will work to reduce impacts on groundwater supply to a less-than-significant level. While these efforts are laudable, there is no evidence in the record to support a contention that this mitigation measure will, in fact, avoid the identified significant adverse impacts including, but not limited to, differential settlement, distribution system pipeline breaks, and other facilities problems. Accordingly, the DEIR must conclude that impacts on groundwater supply will remain significant. Recirculation will be required.

C-3-50.

Page 5-26 through 5-29, (Stormwater; Proposed Mitigation - Performance Standards).

Again, the General Plan Policies which constitute the mitigation measures for the potential impacts identified with respect to stormwater do not contain any performance standards to which subsequent specific plans must be held. For example, General Plan Policy 4.E.4 on page 5-27 simply states that the City shall require projects that have significant impacts on the quantity and quality of surface water to incorporate mitigation measures for impacts related to urban runoff. What standard must these mitigation measures meet? Should the quantity not exceed pre-project quantity? Standards must be identified in these mitigation measures.

C-3-51.

Page 5-36 and 5-37, (Solid Waste; Diversion Programs).

The DEIR cannot assume a reduction in its waste diversion even though required by the SRRE. The SRRE standards may change, the City may not be effective at implementing the SRRE standard, etc. The DEIR must analyze worst case implications and impacts. Impacts on the Yolo County Landfill must be reanalyzed in light of this fact.

C-3-52.

Page 8-3, (Water Quality; Impact Analysis).

There is no evidence presented to support the contention that the use of best management practices and development of a storm drainage ordinance will mitigate impacts on surface drainage water quality to a less-than-significant level. While unquestionably these practices will help improve water quality, the resulting impact might still be significant under Appendix G criteria. Accordingly, the DEIR should be modified to state that this impact will still remain potentially significant. Recirculation is required.

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C-3-53. Page 8-4. (Water Quality: Impact Analysis).

See previous comment. The statement that no further mitigation measures are necessary is not supported by facts in the record.

C-3-54. Page 8-15. (Habitat: Cumulative Impacts).

The DEIR cannot assume that the Yolo County Habitat Conservation Plan will be adopted in 1996. This event cannot be guaranteed and therefore, cannot be relied upon for mitigation purposes. As a result, significant cumulative impact issues are not adequately addressed in the DEIR.

C-3-55. Page 8-16. (Habitat: Mitigation Measures - Performance Standards).

Mitigation measure 7.B.2 on page 8-16 attempts to simply defer a meaningful discussion of mitigation to a later and uncertain planning process. No performance standards for mitigation are identified. For example, readily identifiable standards of mitigation for impacts to Swainson's Hawk habitat are available from California Department of Fish & Game. Yet, the DEIR does not even identify these standards for mitigation purposes.

C-3-56. Page 8-19. (Habitat: Mitigation Measures).

Here the DEIR improperly states that no additional mitigation measures are identified that could guarantee the reduction of this impact of less-than-significant level. See previous comment.

C-3-57. Page 9-1. (Seismic Activity).

The DEIR states "past studies and evaluations of seismic hazards in the region indicate that Woodland is in an area of relatively low seismic activity." It then concludes that there is a possibility for major earthquake related damage in the Woodland area since the area has been placed in Zone 3 of the Seismic Richter Map of the United States. The DEIR fails to point out that California only has two zones (3 & 4) in which any area can be placed. Inclusion of the Woodland area in Zone 3 is not a basis for concluding that there is a possibility for major earthquake related damage in the Woodland area.

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C-3-58. Page 9-2, (Seismic Activity).

The DEIR discusses lurch cracking and lateral spreading without any concluding statement that these problems are not anticipated in the Woodland area. The DEIR should include such a concluding statement.

C-3-59. Chapter 8 - Background Report, (Seismic Activity).

Chapter 8 of the Background Report contains numerous typographical errors and inconsistent data. For example, Table 8-2 indicates that a Richter magnitude earthquake between 6.0 and 6.9 would generate a modified mercalli intensity of VII-VIII, yet the sixth paragraph of page 9-1 in the DEIR states that the Woodland area could "potentially experience groundshaking intensities of up to VI-VII in mercalli intensity". The Midland Fault Zone is stated as being approximately twenty miles southwest of Woodland, while Table 8-3 indicates it to be eleven miles southwest of Woodland. Any discussion or mention of the Midland Fault is meaningless now anyway since current seismology literature has deleted the Midland Fault from consideration as a source of future seismic activity.

C-3-60. Page 9-5; also Background Report - pages 4-11 and 4-12, (Flooding; Analysis and Mitigation).

The DEIR states that the lands located to the east of Woodland are subject to deep flooding, yet the DEIR includes no data upon which such a conclusion can be based. The only supporting data is a reference to a statement made by Reclamation District 2035 to such effect, should the bypass levee not be adequately maintained. There is no evidence in the DEIR to support any contention that the bypass levee will not be adequately maintained, or that consequently, it is likely to fail.

By itself, the DEIR statement would appear to be intuitively correct. However, there is no analysis in the DEIR of the design capacity or level of protection offered, or which could feasibly be offered, by the Yolo Bypass levee. In fact, the threat of deep flooding from a Bypass levee failure is already, or can be feasibly mitigated to a point where such risk is less than other risks already deemed acceptable by the City.

The Corps of Engineers has found the Bypass levee to be adequate to contain its design flow. A high level of protection for the Eastern Area of the City could be secured along the Yolo Bypass because the levee system upstream of the Fremont Weir cannot sustain flows greater than the 200-year level without being overtopped. In effect, the levee system upstream of the Fremont Weir provides a natural safety valve to protect the eastern Woodland area.

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The Corps Draft Supplemental Information Report, American River Watershed Project, California, Volume 1 - Appendix A, Plate 5 shows a Stage Frequency Curve for Woodland (a gage representative of Bypass flood levels near I-5). This curve shows a 1' difference in flood stage between a 100-year flood and a 500-year flood (32.4' and 33.4', respectively). The elevation of the Yolo Bypass Levee south of I-5 is approximately 37'±. Therefore, it is quite feasible to provide a high level (e.g., 500-year level) of protection from Yolo Bypass flooding.

Flooding from Cache Creek can be addressed for the eastern portion of the City with relatively low collection levees that channel to transport water through the Eastern Area. See our response to Notice of Preparation dated June 15, 1995. These mitigations are feasible and must be thoroughly analyzed and identified in the DEIR.

C-3-61.

Page 9-6. (Flooding: Impacts to Existing City - Mitigation).

The DEIR incorrectly assumes that existing development located within the planning area which may continue to be exposed to flooding hazards is not considered an impact of the project. This is a General Plan for the entire City, not just new development areas. The plan sets forth policies and development standards for all lands located within the City. This impact should be identified as significant and unmitigated and feasible mitigation should be explored. For example, are there feasible measures to provide flood protection to the northern part of Woodland from Cache Creek flooding?

C-3-62.

Page 9-24. (Noise Impacts: Mitigation - Performance Standards).

It is interesting and helpful to note that with respect to noise impacts, the DEIR does identify mitigation standards to which subsequent development will be held. This is one of the few instances in the DEIR where we believe CEQA requirements have been met. Similar performance standards should be required in other areas. See, for example, comments #27 and #55 above.

C-3-63.

Page 9-27. (Noise Impacts - Existing City).

The DEIR concludes that there are no mitigation measures available to reduce the impact of future traffic noise on existing noise sensitive uses to a less-than-significant level. While this may be true, it may also not be true in certain instances. The reader simply cannot clearly analyze this conclusion since there is no analysis in the document which would substantiate the conclusion. Is there literally no opportunity within the existing City to retrofit arterial streets with noise mitigating mechanisms, e.g., soundwalls, etc.? Additional analysis is necessary.

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C-3-64.

Page 10-1. (Alternatives).

As a general statement, we believe Chapter 10 fails to meet the standards required by CEQA for analysis of alternatives to the project. Needless to say, virtually all of the information which we provided in our response to the NOP on June 15, 1995 has been ignored.

The analysis of alternatives demonstrates a post hoc rationalization to support one of the two proposed project alternatives, while ignoring or dismissing compelling data that suggests other alternatives may be environmentally superior. As with most sections of this DEIR, we find the alternatives analysis to be conclusory. Substantial data on environmental conditions in the Eastern Growth Alternative was made available through responses to the Notice of Preparation of the DEIR that was simply not considered in the analysis. Our review focuses on the City's apparent desire to paint the Eastern Growth Alternative in its least favorable light. As the primary property owner for this area, we feel the DEIR has done City decision-makers a strong disservice in helping to provide for unbiased, informed decision making.

We feel the alternatives analysis must be completely redone to present an unbiased view of the comparative environmental merits of the alternatives, and that significant new information will need to be presented in this analysis, information which was known by the lead agency but ignored in the EIR. In accordance with Section 15088.5 of the CEQA Guidelines, the City of Woodland is compelled to recirculate its response to this, and other, significant new information that dramatically changes the conclusions of the DEIR. Specific comments, focused on the Eastern Growth Alternative, are provided below:

- a. Land Use: Key statements are provided without support. For instance, the possibility of relocating the City's wastewater treatment plant is "... not considered a feasible option..." due to cost. It is then stated that the treatment plant at this location would result in a division in the City by separating development of the Eastern Area from the rest of the City. The DEIR then argues, without any rationale, the Eastern Area would rely on Sacramento, located twenty miles away, for goods and services, rather than on downtown Woodland, located two to three miles away. Based on this reasoning, it is found in the DEIR that this alternative would have a significant effect on land use.

C-3-65

The City has provided no evidence to support its finding that relocation of the plant is infeasible due to cost, yet the location of the plant is the strongest argument given in the discussion of land use (and in other topics) for finding

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the Eastern Growth Alternative to be environmentally inferior to the proposed project alternatives. What would it cost to relocate the plant? Would the cost be shared by development interests? Is the net cost infeasible? The City must answer these questions in order to provide for informed decision making. Once this question is answered, would there still be a physical separation? What is the basis for the assumption that residents of this location would rely on Sacramento rather than Woodland? Would the impact remain significant, and if so, why?

C-3-6d

Furthermore, in our response to the NOP on June 15, 1995, we supplied significant information regarding the feasibility of relocating a material portion of the wastewater treatment plant and also provided land use planning concepts which showed that with respect to the remainder of the wastewater treatment plant, surrounding land uses could be designed in such a fashion as to buffer other land uses from any remaining impacts. Again, none of this information is analyzed in the DEIR.

C-3-6f

Similarly, the DEIR states that should the Contadina treatment facility be relocated, the property "might" revert to its Williamson Act status. This statement is then used in partial reliance to reach the conclusion that the Eastern Growth Alternative is faced with a "number of constraints and uncertainties". No factual or legal basis is presented in support of the statement that the property might revert to Williamson Act status. In fact, there is no factual or legal basis for such conclusion. Again, this is simply additional evidence of the post hoc rationalization to support one of the two proposed project alternatives while ignoring or dismissing compelling data that suggests that the Eastern Alternative may be environmentally superior.

C-3-6g

b. Agriculture. Prime agricultural land is a non-renewable natural resource. Once developed with urban uses, it is not useable for agriculture again. It is not like a potential flooding issue or a Contadina treatment facility relocation that have engineering solutions. Consequently, the City should seriously weigh its application and consideration of environmental superiority when considering non-renewable natural resources in comparison with engineering and planning issues that can be resolved.

C-3-6h

As discussed previously, the issue of inclusion of prime farmland in the Urban Limit Line in the Eastern Alternative, whereas it is not for the proposed project alternatives, demonstrates a bias against the Eastern Alternative that does not provide for informed decision making. Based on the assumptions included in the DEIR, no prime ag land would be removed and the impact of the Eastern

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Alternative would be less-than-significant. Very clearly, this alternative is environmentally superior to either of the proposed project alternatives, both of which contemplate removal of over 1,000 acres of non-renewable prime farmland. This is the only alternative capable of meeting basic project objectives that does not contemplate removal of prime farmland.

C-3-70

c. Streets and Roads. The discussion of streets and roads for the Eastern Growth Alternative assumes that connections to Woodland's existing system would be difficult because of the location of the wastewater treatment plant. Again, there is no analysis or response to the information delivered in our response to the Notice of Preparation. And, this conclusion assumes that all or a material part of the wastewater treatment plant cannot be relocated, an assumption which is not supported by any facts in the DEIR.

C-3-71

d. Public Transportation, Non Motorized Transportation. Again, this discussion appears to be a post hoc rationalization for Alternatives 1 and 2. Given appropriate design, development of the Eastern Growth Alternative could actually result in increased bicycling and walking opportunities to nearby adjacent services. The design would not necessarily be locked into Woodland "grid" pattern and could more effectively locate services adjacent to population areas.

C-3-72

e. Water Supply and Delivery. The ability of the Eastern Alternative to use surface water entitlements from the Sacramento River is not fully acknowledged. In its response to the NOP, Conaway Conservancy, as the owner of a majority of developable property in the Eastern Growth Alternative indicated that it had entitlements to Sacramento River water, and was prepared to allocate this to the development of the property. Use of surface water can be assumed, at least for a large part of this property, and this would reduce reliance on groundwater. This is clearly environmentally superior to either of the proposed alternatives.

C-3-73

f. Wastewater. As discussed above, the City has provided no evidence to suggest relocation of all or any material portion of the wastewater treatment plant is infeasible, that if moved, the Contadina wastewater facility would revert to Williamson Act status, or that land uses surrounding the wastewater treatment plant, could, if properly designed, adequately buffer any known impacts of wastewater treatment plant operation. A response to this substantive comment and reconsideration of this issue is critical.

C-3-74

The DEIR cites odors as the need for establishing a buffer around the plant. The current method of sludge disposal involves a water cap over the sludge disposal ponds. Ponding is the least expensive way to dispose of sludge and

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maintaining a water cap is the least expensive effective way to maintain odor control.

C-3-74
 (cont)

There are, however, feasible alternatives which would handle sludge disposal. Mechanical dewatering is one option. Another alternative involves the relocation of the ponds to the south. Annual O&M would be similar to existing costs and the potential for odor would remain small and well removed from potential development in the Eastern Alternative (and elsewhere in the city). This is not discussed in the DEIR.

C-3-75

In any case, the DEIR analysis assumes that the expansion of the treatment plant due to the increased flows permitted by the General Plan would alter the way in which sludge is handled. The DEIR states (for the two alternatives it recommends -- page 5-13 and 5-14): "This analysis also assumes that pond disposal of sludge would not be feasible in the future due to increased odor concerns; therefore new sludge stabilization and dewatering facilities would be required". In other words, the Eastern Alternative is being precluded based in part on buffering for odors, when the DEIR recommends that the source of those odors be removed due to the expansion of the plant necessitated by the General Plan itself.

C-3-74

The toxics referred to in the DEIR are most probably chlorine and sulfur dioxide although it is not clearly specified. Chlorine handling has come under increasing scrutiny by regulatory agencies, not because of the accidents that have occurred, but because chlorine if released accidentally is a toxic substance. The regulations include double wall containment and other safeguards which have increased the cost of chlorine disinfection. Because of the increased costs to plant operations of chlorine products and because dechlorination is now required as a result of concern over residual chlorine, the trend is for wastewater plants to shift to other methods of disinfection, particularly ultraviolet (UV) disinfection.

Since the DEIR indicates that the growth permitted by the General Plan will necessitate a major expansion of the plant, the method of disinfection will certainly be the subject of study. In fact, it is quite possible that chlorine disinfection will be replaced by another technique, such as UV. The cost effectiveness of UV disinfection versus chlorination-dechlorination has been demonstrated at many facilities recently. For that reason, providing a land use buffer for toxics is providing a solution with long term implications to what may well be a short term condition.

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C-3-77 g. Vegetation and Wildlife Resources. The conclusion in the DEIR that the Eastern Growth Alternative would result in the greatest loss of wetland areas, including vernal pool areas, is premature. First of all, design considerations can significantly mitigate these impacts and second, the owners of a majority of lands within the Eastern Alternative own large adjacent areas upon which mitigation can take place. These opportunities do not appear to be available with respect to Alternatives 1 and 2.

C-3-78 h. Air Quality. As stated above, the conclusion that the Eastern Growth Alternative would be "separated" from the rest of the community, would result in longer trips within Woodland, and would be a prime location for housing for commuters to Sacramento is simply not substantiated by any evidence or facts in the DEIR.

C-3-79 i. Seismic and Geology Hazards. Again, we reference our response to the Notice of Preparation, dated June 15, 1995, to the effect that any additional engineering for foundations due to expansive soil qualities would be minimal in nature and similar to techniques used throughout the Sacramento Valley. Furthermore, it is likely that the cost to install storm sewers in the Eastern Area might be less expensive than in the case of Alternatives 1 or 2 due to the presence of deep clay soils that would allow efficient use of cast in place pipe for collection systems.

The DEIR states that "development of the water delivery system would be more difficult, however, because the high water table in the area would make it more difficult to ensure integrity of underground pipes". Water supply systems generally are installed at shallow depths below grade. Available groundwater mapping indicates that groundwater likely is present within approximately five to fifteen feet of the ground surface. Under these conditions, water supply pipelines can be installed without any unusual difficulties. The DEIR presents no facts upon which to support its conclusions in this regard.

C-3-80 j. Flood Hazards. See comment #60 above. The impacts relating to flooding are fully mitigatable and we have demonstrated this as set forth in our response to the NOP. The DEIR makes no attempt to address or analyze these issues and therefore inappropriately concludes that the "feasibility costs and environmental impacts of these improvements are unknown."

C-3-81 k. Noise. The statement regarding aircraft noise is not supported by any evidence in the record; the Eastern Growth Alternative is well outside the sixty Db CNEL associated with airport operations at Sacramento Metropolitan Airport.

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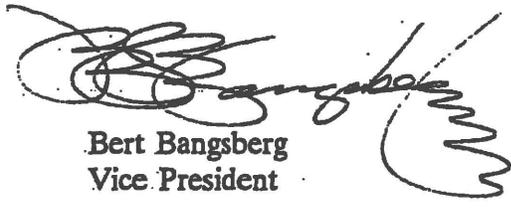
Furthermore, to the extent that this alternative would rely less on existing city streets both for purposes of reaching services and reaching SR 113 or I-5, it is not altogether clear that the impact from this project on existing development would be significant with respect to noise. In this respect, this alternative is environmentally superior to either of the proposed project alternatives.

C-3-82 1. Growth Inducement. The DEIR ignores a critical fact here. The Eastern Alternative is growth inducing in the direction of non-prime agricultural soils. Alternatives 1 and 2 are growth inducing in the direction of prime agricultural soils. The Eastern Alternative is environmentally superior in this respect.

C-3-83 In conclusion, we believe the DEIR is deficient for all the reasons set forth above. Many of the deficiencies are fatal and require correction and recirculation of the DEIR. In particular, it is our opinion that the Eastern Growth Alternative, while it too will have environmental issues to contend with, will be acknowledged as the environmentally superior alternative once a thorough analysis of all of the environmental issues has been completed. This conclusion will require acknowledgment in the recirculated DEIR.

Thank you for this opportunity to comment.

Sincerely,


Bert Bangsberg
Vice President

cc: Mayor Gary Sandy and
Members of the Woodland City Council
Chairperson Jan Hicks and
Members of the Woodland City Planning Commission
Kris Kristensen - City Manager
Robert Frommer - President PG&E Properties

D-1

WHITMAN F. MANLEY
10 FIRST STREET
WOODLAND, CALIFORNIA 95695
916/668-1641

November 29, 1995

BY FACSIMILE AND REGULAR MAIL

Community Development Department
City of Woodland
300 First Street
Woodland, California 95695

Re: General Plan EIR

To whom it may concern:

I offer the following comments on the Draft EIR for the proposed General Plan. By and large, it's an excellent document, which is unsurprising given that it was produced under the auspices of Larry Mintier. I commend the City on its decision to retain Mr. Mintier.

My comments focus on policies that I believe the City should consider to mitigate the project's environmental impacts.

1. **Agricultural Resources**

The EIR states that new development will have a significant, unavoidable impact on prime agricultural land. The City needs to adopt more mitigation measures to address this impact. In particular, the City should adopt a General Plan policy crafted along the following lines:

- If development is proposed for land currently devoted to agricultural uses, then, prior to the issuance of a specific plan or tentative map for that development, the applicant shall prepare a study showing the amount of agricultural land to be affected by the development. The applicant must pay to the City a fee to mitigate impacts to agricultural lands.

The fee should be imposed on a per-acre basis. The per-acre fee for prime agricultural land should be highest, with relatively lower fees for agricultural land of State-wide or local importance. The City should either determine the amount of the fees before it adopts the General Plan, or commit in the General Plan to performing a study to set the fees. In setting the fees, the guiding principle should be to provide the City with enough money to purchase conservation easements or comparable devices to protect a proportionate amount of agricultural land. The money paid by developers would be dedicated exclusively to this purpose. Ideally, the money would be used to further efforts to establish a permanent agricultural buffer between Woodland and Davis.

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2. Transportation

The General Plan policy for transportation is too lenient. Policy 3.A.2 calls upon the City to maintain LOS C "except within one-half mile of state or federal highways and freeways and within the Downtown core." These "exceptions" encompass much of the town. In particular, these exceptions encompass the Main Street/Interstate 5 interchange, which already operates at unacceptable LOS and is projected to get worse once Walmart is built. The exceptions should be drawn more narrowly to encompass less of the town (e.g., "a quarter mile from Interstate 5 interchanges").

D-1-2

In addition, if there is to be an exception, then the General Plan should at least adopt an alternative LOS standard, rather than leaving the matter entirely open. As it now stands, the circulation system falling within the exception is subject to *no standard at all*. Conditions could degrade to LOS F and beyond, and yet the General Plan would contain no policy to require an improvement in those conditions. At a minimum, some standard should be identified for portions of the transportation system falling within the exception (e.g., "intersections may operate at LOS B or better during a.m. or p.m. peak hours only, provided conditions do not degrade to below LOS C for more than one hour per day on a cumulative basis").

* * *

I agree it is important that the City study ways to complete the I-5/SR-113 connection. (Implementation Program 3.2.) How will such a study be funded? How will the improvements themselves be funded? New development, particularly in the Southeast portion of the City, will reap significant benefits from such a connection. All such development should be required to pay its fair share (and that share would be considerable) towards such improvements. The General Plan should adopt policies to make this clear.

D-1-3

3. Downtown

I agree with the policies calling upon the City to encourage revitalization of the downtown area. The policies do not go far enough, however. The single greatest impact on the downtown area will be the City's land use decisions in other parts of town. If, for example, the City permits entertainment uses (e.g., movie theatres) in areas other than downtown, then the City will never succeed in concentrating such uses in the downtown area. The policies pertaining to the downtown area should be strengthened to preclude, or at least discourage, uses such as movie theatres in areas other than downtown.

D-1-4

4. Alternatives

Alternatives 1 and 2, regrettably, will both consume a good deal of prime agricultural land. Other alternatives (particularly the eastward alternative) would have less of an impact on prime agricultural land, but may present other, intractable problems. In short, there is no easy answer regarding the direction of future growth.

D-1-5

D-1

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D-1-5
(cont)

Woodland has had the good fortune to be led by Councils that have "tightly" planned the community; the inventory of vacant land has always been relatively modest, and areas have been opened up for growth only on an as-needed basis. I urge the Council to follow that example. One way to do that would be to reduce the target population for this plan. In other words, the Council could plan for a degree of growth, but not to a population of 64,700. The adopted alternative would then be shaved back to the extent possible to accomodate only the reduced level of growth. Impacts to agricultural lands would thereby be reduced.

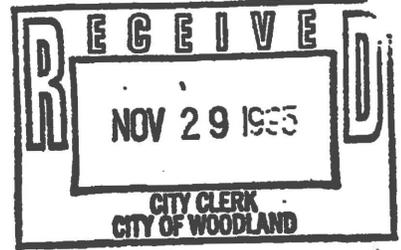
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Thank you for the opportunity to present these comments. I look forward to reviewing the Final EIR.

Very truly yours,

Whit Manley
Whitman F. Manley

KENNETH and KATHRYN TROTT
617 Cross Street
Woodland, CA 95695



November 28, 1995

City Council
Woodland City Hall
300 First Street
Woodland, CA 95695

Dear Mayor Sandy and Council Members:

Per our letter of November 16, 1995, following are our remaining comments on the Draft General Plan.

1. We would like to see an expansion of the policies in support of Goal 1.J, "To promote the productivity of agricultural lands surrounding Woodland and the continued viability of Yolo County Agriculture". A policy on economic support of Yolo County agriculture would give some meat (and tomatoes) to the latter part of the goal statement. The statement could read:

D-2-1

The City shall support the local agricultural economy by encouraging the location of agricultural support industries in the City, establishing and promoting marketing of local farm products through a Woodland Farmers' Market, exploring economic incentives and support for continuing agricultural uses within the City (including within the Urban Reserve), and providing its fair share of adequate housing to meet the needs of agricultural labor.

A few years ago Woodland had a Farmers' Market, but it seemed to be a half-hearted attempt with little City support. A viable Farmer's Market downtown would support a number of General Plan Goals including bringing people into the downtown area to shop, and to build community identity with agriculture.

D-2-2

2. We would add to policy 6.B.5., home ownership. Many of the older houses in the downtown area are small houses that we suspect are often rental. Encouraging home ownership for entry level buyers with financial incentives would again support more than one General Plan goal, including upgrading historic buildings.

D-2-3

3. Policy 7.A.3 calls for the promotion of water conservation. It is ironic that many parts of Woodland are not metered. We would recommend that

Kenneth and Kathryn Trott
November 28, 1995
Page Two

the City investigate retrofitting non metered homes with water meters. Currently we have no way of checking the effects of our attempts to conserve water at an individual homeowner level. Meters would help homeowners who want to conserve water to do so, and provide incentives for those who do not to either conserve or pay for the luxury of inefficient water use.

D-2-4

4. The Yolo County Resource Conservation District is one of the more effective such districts in the State. Chapter 7 of the Draft General Plan offers a number of opportunities for the City to have a partnership with the RCD, including the areas of water conservation, groundwater recharge, and habitat conservation and enhancement. The City could also work with the RCD in a number of other areas of the General Plan, including tree planting, native plant and drought tolerant landscaping, environmental education and agricultural land conservation. We recommend that the City investigate being annexed by the RCD, or signing an agreement for providing specified services to the City.

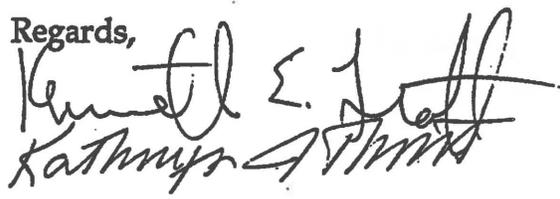
D-2-5

Two new topics have just recently been raised on which we would like to comment. First, we support the lower population goal for the General Plan of 57,000 to 58,000 by 2015. The lower target is consistent with the Small Town Character goal of the Plan. We would advocate achieving that lower population by removing land from the General Plan area. This would be consistent with Goal 1.J.

D-2-6

Finally, we do not support the Hiedrick Farms proposal to amend the Draft General plan (a GPA before the Plan is even adopted!) to include their lands in exchange for free land. We reiterate our November 16 comment that Woodland should adopt the Plan it wants and let the prospective land developers conform their proposals. As we stated previously, we oppose growth to the east. For Hiedrick Farms to come forward with this proposal at the last minute is not respectful to the General Plan process.

In closing, we feel that you have done a fine job developing a Plan for Woodland's next 20 years. Thank you and congratulations.

Regards,


Ken and Kathy Trott

RECEIVED
NOV 29 1995

Debra L. Gonella
10 First Street
Woodland, California 95695
(916) 668-1641

November 29, 1995

Mayor Gary Sandy and
City Council Members
City of Woodland
300 First Street
Woodland, California 95695

Dear Honorable Mayor and City Council Members,

I have followed the General Plan process with interest. From talking with friends and reading the newspaper, I understand the City has come under considerable pressure from various developers to direct growth to the east or to the south. I have also heard that some developers have even threatened to sue the City if their demands are not met.

I urge the City Council to ignore such threats. These developers, understandably, are interested in their bottom line. I've seen them at the various meetings - brief cases full of "statistical data" to support their position.

D-3-1

I come to the discussion with baggage as well. My bags, however, are full of diapers and baby toys. My interests and that of the City Council should be much broader.

Through both wisdom and good fortune, Woodland has been tightly planned, and there is not a lot of vacant land left within its boundaries. The city's boundaries should be expanded only to the extent necessary to accommodate modest anticipated growth. It appears to me that both alternatives now before the Council go too far. I therefore urge the Council to approve a scaled back version of Alternative 2 which appears to affect somewhat less prime agricultural land.

I also urge the Council to move forward with adopting the General Plan. This Council has participated directly in the process for many months. This Council was elected to update the plan, and it should do just that. Adoption of the General Plan should not be delayed until after the next city election.

Thank you.

Sincerely,

Debra L. Gonella
Debra L. Gonella

cc Janet Ruggiero



CALIFORNIA ARCHAEOLOGICAL CONSULTANTS, INC.
ROBERT ORLINS • P.O. BOX 1932 • WOODLAND, CA 95695-1932 • (916) 662-0979

11/29/95

City of Woodland:

I was given the Draft General Plan for comment by a member of the Historic Preservation Commission.

I have only had it for a few days & so was not able to type all of the comments or provide detailed explanations.

In my judgement, as a 30-year resident home-owner, local business person, and cultural resource specialist, the Historic Preservation Sections of the Draft General Plan are not yet acceptable.

Also a need for general editing - grammar.

Signatures, punctuation.

CALIFORNIA ARCHAEOLOGICAL CONSULTANTS, INC.

ROBERT I. ORLINS

39 FIRST ST.
WOODLAND, CA. 95695
916-662-0979

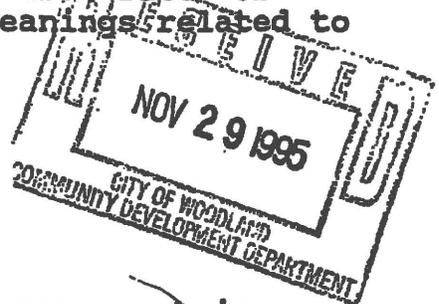
Thank you.
Sincerely,
[Signature]

Woodland Preservation Element

D4-1

General comments: Terminology should be made consistent throughout. Use "cultural resource" "historic resource" or "historic property" as a general term. Don't use "site" or "structure" because they have very specific meanings related to National Register definitions.

Use "historic" preservation not "historical".



Specific comments:

p. 1

D4-2

The use of "events" in the first line in last paragraph is confusing. "Events" presumably are not in need of preservation. Is there something else intended here? e.g., are you talking about ethnic celebrations or some other cultural activity that you do want to preserve?

p. 2

D4-3

I guess the guidelines for architectural and historic significance are O.K. However they do seem awkward when compared with the more straightforward criteria of the National Register or the California Register.

Why is 1940 given as the ending date for architectural significance? Generally, properties that are fifty years old are old enough for consideration for listing in the National Register.

p. 3

I am not sure how a property would qualify as culturally significant if it didn't already exhibit historic significance. Is the intent to allow new properties to be designated?

D4-4

Additional evaluation factors are questionable. Perhaps something should be saved even if it has no capacity for public use and enjoyment, etc.

What about significance for archeological properties?

p. 4

D4-5

Refer to the California provisions for property tax reduction as "Mills Act" reductions, since this is a more familiar term. Mills Act reductions are available for properties that are local, state or national landmarks.

p. 5

D4-6

Sentence on the National Trust is very long and not very specific about how the Trust could serve the community. Also, there are no more matching funds for rehab available through the 1966 National Historic Preservation Act. The federal funds are

provided to the states on a matching basis so that the states can administer federal programs such as the National Register of Historic Places, the federal tax credit for rehabilitation and environmental review of federally assisted projects.

This section should mention the California Office of Historic Preservation as a source of further assistance in preservation matters.

Environmental Review

OHP reviews thousands of federally assisted projects each year. As required by Section 106 of the National Historic Preservation Act, the staff works with federal agencies to identify resources that may be eligible for the National Register of Historic Places. If historic properties are involved in an undertaking, OHP comments on the project's effects and suggests ways to avoid or reduce any harmful impacts.

During this process, OHP's Native American Coordinator ensures that Native American concerns for archeological sites and other cultural properties are also taken into account.

PUBLIC INFORMATION

If you wish further information on OHP's programs or publications, please check the appropriate items listed below and mail to:

74 State Office of Historic Preservation
P.O. Box 942896
Sacramento, CA 94296-0001
916/653-6624

- Survey information
- Archeological Inventory Information Centers
- National Register of Historic Places
- State registration programs
- Federal tax credits
- Grants information
- Certified Local Governments
- A Five-Minute Look at Section 106 Review
- OHP Newsletter

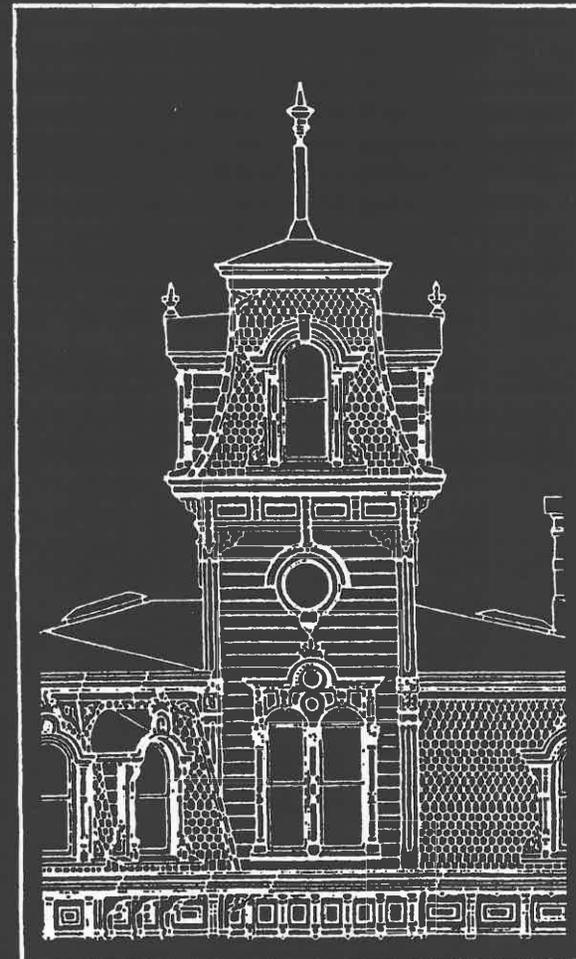
This publication was partially financed with federal funds from the National Park Service, Department of the Interior, under the National Historic Preservation Act of 1966, as amended. However, the contents do not necessarily reflect the views or policies of the Department of the Interior, nor does the mention of trade names or commercial products constitute endorsement or recommendation by the Department of the Interior.

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Director, Equal Opportunity Program
U.S. Department of the Interior
National Park Service
P.O. Box 37127
Washington, DC 20013-7127

01 01501

THE OFFICE OF HISTORIC PRESERVATION



California Department of Parks and Recreation

Pete Wilson, Governor

D-4

HISTORIC PRESERVATION

California's history is embodied in buildings, structures, sites, and objects—in places that show us our collective past. These historic resources are a tangible link to people and events that have shaped our lives, to builders who created our architectural legacy, and to ways of life almost forgotten.

A covered bridge, the Coloma gold discovery site, Hearst Castle, a Chumash village, a sunken Spanish galleon, the old Governor's Mansion, La Purisima Mission, a Chinese temple, Bodie, and the Jet Propulsion Laboratory all belong to our history and heritage. They are a significant part of our environment and worthy of protection.



THE OFFICE OF HISTORIC PRESERVATION

The Office of Historic Preservation (OHP) helps Californians preserve this legacy, now and for generations yet to come. The office is responsible for administering preservation programs set up by federal and state law. Each state has such an office, established by the National Historic Preservation Act of 1966 and headed by a State Historic Preservation Officer. California is also served by the State Historical Resources Commission, a citizens group appointed by the Governor.

A team of historians, archeologists, architects, and support staff manage OHP's preservation programs:

● Survey and Inventory

Before we can work to preserve our important historic properties, we need to identify them. OHP offers guidance to communities that are conducting surveys of their historic resources. The information they gather goes into the statewide inventory and becomes part of a computerized database.

OHP also collects information from the regional archeological survey centers, and maintains a statewide archeological inventory.

● Registration

After historic properties have been identified, they may be nominated for placement on one of the federal or state lists administered by OHP.

The federal government maintains the National Register of Historic Places, which recognizes cultural resources that are important to the nation. OHP staff reviews nominations to the National Register, then submits them to the State Historical Resources Commission. If approved, the nominations are sent to the Keeper of the National Register for acceptance.

OHP also administers two state registration programs. State Historical Landmarks are properties of statewide significance, which may be marked by bronze plaques and road signs. Points of Historical Interest, of local significance, may also have markers.

● Tax Credits

Financial incentives in the form of tax credits and conservation easements encourage property owners to rehabilitate buildings listed on the National Register. When someone applies for tax credits, OHP certifies a building's significance and verifies that work is being done in accordance with standards set by the Secretary of the Interior.

During the past decade, hundreds of California buildings have been rehabilitated with the assistance of tax credits, generating over half a billion dollars in private investment.

● Grants

Funds for historic preservation projects can come from the federal or state government, or from voter-approved bond acts. OHP distributes these funds as directed in the legislation or bond act, and ensures that the preservation projects follow appropriate standards.

In 1989, \$11 million was provided to over 30 local governments and nonprofit groups for acquisition or restoration of significant resources.

● Certified Local Governments

Local governments with a commitment to preservation can apply to become a Certified Local Government (CLG), and thus be eligible to compete for special federal funds. This funding can be used for various preservation activities in the community. OHP helps governments with the application process and administers grant funds earmarked for CLGs.

D-4

NATIONAL REGISTER PROPERTY AND RESOURCE TYPES

Type	Definition	Examples
BUILDING	A building, such as a house, barn, church, hotel, or similar construction, is created principally to shelter any form of human activity. "Building" may also be used to refer to a historically and functionally related unit, such as a courthouse and jail or a house and barn.	houses, barns, stables, sheds, garages, courthouses, city halls, social halls, commercial buildings, libraries, factories, mills, train depots, stationary mobile homes, hotels, theaters, schools, stores, and churches.
SITE	A site is the location of a significant event, a prehistoric or historic occupation or activity, or a building or structure, whether standing, ruined, or vanished, where the location itself possesses historic, cultural, or archeological value regardless of the value of any existing structure.	habitation sites, funerary sites, rock shelters, village sites, hunting and fishing sites, ceremonial sites, petroglyphs, rock carvings, gardens, grounds, battlefields, ruins of historic buildings and structures, campsites, sites of treaty signings, trails, areas of land, shipwrecks, cemeteries, designed landscapes, and natural features, such as springs and rock formations, and land areas having cultural significance.
STRUCTURE	The term "structure" is used to distinguish from buildings those functional constructions made usually for purposes other than creating human shelter.	bridges, tunnels, gold dredges, firetowers, canals, turbines, dams, power plants, corncribs, silos, roadways, shot towers, windmills, grain elevators, kilns, mounds, cairns, palisade fortifications, earthworks, railroad grades, systems of roadways and paths, boats and ships, railroad locomotives and cars, telescopes, carousels, bandstands, gazebos, and aircraft.
OBJECT	The term "object" is used to distinguish from buildings and structures those constructions that are primarily artistic in nature or are relatively small in scale and simply constructed. Although it may be, by nature or design, movable, an object is associated with a specific setting or environment.	sculpture, monuments, boundary markers, statuary, and fountains.
DISTRICT	A district possesses a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.	college campuses; central business districts; residential areas; commercial areas; large forts; industrial complexes; civic centers; rural villages; canal systems; collections of habitation and limited activity sites; irrigation systems; large farms, ranches, estates, or plantations; transportation networks; and large landscaped parks.

Lighthouse with attached keeper's house = Structure

House with attached garage = Building

District applies to properties having:

- a number of resources that are relatively equal in importance, such as a neighborhood, or
- large acreage with a variety of resources, such as a large farm, estate, or parkway.

A district may also contain individual resources that although linked by association or function were separated geographically during the period of significance, such as discontinuous archeological sites or a canal system with manmade segments interconnected by natural bodies of water. A district may contain discontinuous elements only where the historic interrelationship of a group of resources does not depend on visual continuity and physical proximity (see page 57 for further explanation).

NAME OF RELATED MULTIPLE PROPERTY LISTING

Enter the name of the multiple property listing if the property is being nominated as part of a multiple property submission. This name appears on the multiple property documentation form (NPS 10-900-b). Instructions for preparing multiple property submissions are found in Chapter IV and in National Register Bulletin 16B: How to Complete the Na-

R. Ortins 11/29/95 D4

CHAPTER 6

HISTORIC PRESERVATION

6.1 INTRODUCTION

This chapter provides a summary of the legal basis for preservation planning and criteria for evaluating the significance of the City's historical and cultural resources. It includes an overview of the history of the City, including its physical development. This overview helps to define the historic character and historical contexts of the community which are important in terms of establishing historical significance and developing specific preservation goals and activities. Other sections include an overview of the City's historical resources inventory and some of the incentives and tools that are available for the preservation of important historical resources.

6.2 HISTORIC AND CULTURAL RESOURCES

Authority to include a Historic Preservation Element in the General Plan as an optional element is found in the California Government Code, Section 65303 which specifically defines a historic preservation element as follows:

"A Historical Preservation Element for the identification, establishment and protection of sites and structures of architectural, historical, archaeological or cultural significance, including significant trees, hedgerows and other plant materials. The Historical Preservation Element shall include a program which develops actions to be taken in accomplishing the policies set forth in this element."

Woodland has many significant historic buildings, districts, events and artifacts ^{structures, features, that} which relate to the development of the community. Public awareness of historic preservation has increased remarkably in recent years. The Woodland community has shown a concern for preserving its heritage of architecturally and historically significant buildings believing these buildings are an essential part of City life. Recognition that several old landmarks have already been demolished has stimulated local interest in a preservation program to restore the City's older and select districts.

NATIONAL REGISTER PROPERTY AND RESOURCE TYPES

Type	Definition	Examples
BUILDING	A building, such as a house, barn, church, hotel, or similar construction, is created principally to shelter any form of human activity. "Building" may also be used to refer to a historically and functionally related unit, such as a courthouse and jail or a house and barn.	houses, barns, stables, sheds, garages, courthouses, city halls, social halls, commercial buildings, libraries, factories, mills, train depots, stationary mobile homes, hotels, theaters, schools, stores, and churches.
SITE	A site is the location of a significant event, a prehistoric or historic occupation or activity, or a building or structure, whether standing, ruined, or vanished, where the location itself possesses historic, cultural, or archeological value regardless of the value of any existing structure.	habitation sites, funerary sites, rock shelters, village sites, hunting and fishing sites, ceremonial sites, petroglyphs, rock carvings, gardens, grounds, battlefields, ruins of historic buildings and structures, campsites, sites of treaty signings, trails, areas of land, shipwrecks, cemeteries, designed landscapes, and natural features, such as springs and rock formations, and land areas having cultural significance.
STRUCTURE	The term "structure" is used to distinguish from buildings those functional constructions made usually for purposes other than creating human shelter.	bridges, tunnels, gold dredges, firetowers, canals, turbines, dams, power plants, corncribs, silos, roadways, shot towers, windmills, grain elevators, kilns, mounds, cairns, palisade fortifications, earthworks, railroad grades, systems of roadways and paths, boats and ships, railroad locomotives and cars, telescopes, carousels, bandstands, gazebos, and aircraft.
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DISTRICT	A district possesses a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.	college campuses; central business districts; residential areas; commercial areas; large forts; industrial complexes; civic centers; rural villages; canal systems; collections of habitation and limited activity sites; irrigation systems; large farms, ranches, estates, or plantations; transportation networks; and large landscaped parks.

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A district may also contain individual resources that although linked by association or function were separated geographically during the period of significance, such as discontinuous archeological sites or a canal system with manmade segments interconnected by natural bodies of water. A district may contain discontinuous elements only where the historic interrelationship of a group of resources does not depend on visual continuity and physical proximity (see page 57 for further explanation).

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CULTURAL SIGNIFICANCE

Places ^{that} which provide information ^{about} concerning social and cultural trends ^{that} may reflect a people's beliefs, skills, and institutions of a given time. Examples are the Opera House, schools, museums and religious structures. ^{period,}

Additional evaluation factors of importance are the capacity of the structure for public use and enjoyment, its adaptability to other uses and planning considerations (i.e., current zoning, adequacy of property boundaries and parking, conformance with land use in the General Plan and endangered status).

PRESERVATION

Preservation of Woodland's significant buildings and areas has largely ^{been} relied on individual interest. The Yolo County Historical Society is one organization which strives to save historic structures and to educate local residents about the history of the City and the County. A nonprofit, private organization with several hundred members, the Society exists to research, interpret and disseminate information about Yolo County's history.

Through a system of [?] ~~functioning~~ committees, historic sites are identified; displays are arranged and prepared; and programs, tours and publications are scheduled and published. Various fund-raising activities are organized to support the cost of the Society's operations. The Yolo County Historical Society has been instrumental in the restoration and preservation of the Woodland Opera House, Springlake School and the Gibson House Museum. The YMCA has actively participated in the preservation of Nelson's Grove, a 13.5 acre grove of native oak trees once used for recreation and social gatherings by area residents. The grove is located northeast of County Road 99E and County Road 18B.

There are many ways in which the City and County can promote preservation. In 1971, the City adopted an ordinance providing for the creation of a Historical Landmarks Advisory Committee and Historic District Zoning. This ordinance was promulgated through the efforts of the County Historical Society, the Yolo County Historical Landmarks Advisory Committee and the City Planning Commission. This ordinance was replaced in 1981 by the current ordinance which reconstituted the Historical Landmarks Advisory Committee as the Historical Preservation Commission but eliminated all references to residential properties.

The Historical Preservation Commission is composed of seven members appointed by the City Council. The Commission considers applications for non-residential Historical Districts and Historical Landmarks. They also review building permits authorizing demolition or exterior alterations, additions or modifications to designated historic buildings.

There are currently three City Historic Districts, four City Historic Landmarks, three State Historical Landmarks and nine National Register structures in Woodland. The Commission

Not a sentence

Cultural signif. is independent of these

Not valid factors to evaluate cultural significance.

They relate to zoning & reuse.

Non-Residential? Residential?

It is necessary to present a framework for the development of specific criteria for structures, sites and areas of architectural, historical and cultural significance. Basic criteria provide methods of evaluating significant structures within urban areas. The following guidelines may be considered in developing criteria for determining the significance of structures and areas.

cultural resources

ARCHITECTURAL SIGNIFICANCE

1. *Buildings* Structures or areas that embody distinguishing characteristics of an architectural style, period, method of construction, or architectural development in a City.
2. Notable works of a master builder, designer or architect whose style influences the City's architectural development or structures showing the evolution of an architect's style.
3. Rare structures displaying a building type, design or ingenious building form.
4. Structures which embody special architectural and design features.
5. Outstanding examples of structures displaying original architectural integrity, structures and/or style.
6. Unique structures or places that act as focal or pivotal points important as a key to the character or visual quality of an area.

Woodland has a wide range of *buildings* structures built between 1860 and 1940 that exhibit architectural styles ranging from a Classical Revival farm house through the Victorian Gothic era and the queen Anne style to the Modern and International styles.

HISTORIC SIGNIFICANCE

1. *Buildings* Sites and structures connected with events significant in the economic, cultural, political or social history of a community, state or nation.
2. *Buildings and* Structures or areas identified with the lives of historic personages of a community, state or nation.
3. *Buildings* Sites and groups of structures representing historic development patterns (urbanization patterns, railroads, agricultural settlements, canals, etc.)

Locally, Dead Cat Alley is an area of historical significance because of its relationship to the Chinese people and the development of the downtown area.

Integrity
Redundant
Unclear

Example
Policy

Rewrite

AREAS OF HISTORIC INTEREST

	NATIONAL REGISTER
	CITY HISTORIC LANDMARK
	STATE HISTORIC MONUMENT
	HISTORIC SURVEY SITES

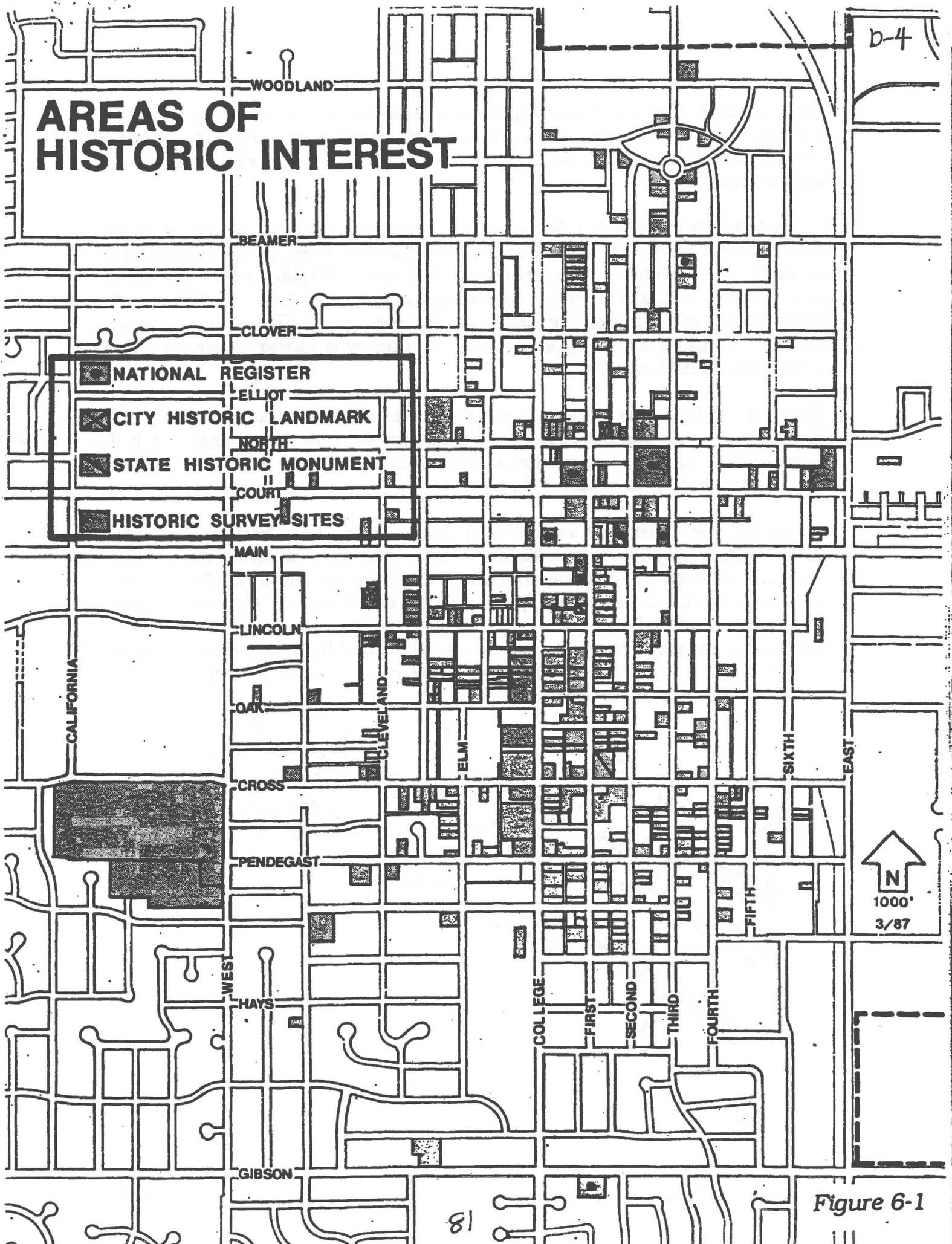


Figure 6-1

has instituted a program of awarding Heritage Home Awards to individuals who do an outstanding job of maintaining and/or restoring their historic homes. Forty-five have been awarded to date. Figure 6-1 and Tables 6-1 and 6-2 provide a list and location of these historic buildings.

In 1981 the City obtained a Federal grant through the California Office of Historic Preservation to prepare a historical resource inventory of structures in Woodland built prior to 1940. The inventory was completed in 1982 and 1,000 sites were surveyed and photographed. A detailed survey form was prepared for 364 sites. In 1993 the City authorized the completion of a historical resource inventory of commercial and industrial structures within the Redevelopment District. This survey is nearing completion and will supplement the 1982 inventory.

Easements can be another tool used to further historical preservation purposes. An easement does not affect the ownership of property but only certain rights that go along with it. For example, there are facade or architectural easements by which the exterior of a structure may be controlled by the holders of the easement.

Several tax relief benefits are available for preservation activities. Charitable contributions to preservation programs are tax deductible as is the value of a dedicated historic or facade easement. The California Revenue and Taxation Code, Sections 50280 - 50289 provides for a reduction in local tax assessments for designated State and national landmarks. To qualify for the reduced assessment, the owners of landmarks must agree to maintain the site. In some areas, non-profit groups have purchased and restored historical structures and then, prior to their sale, placed deed restrictions on the property which prevent demolition or significant alterations of the structure.

*Where is the Historic Neighborhood Preservation District on map?
Why not discussed in text?*

TABLE 6-1

pp 20 p 13/135

CURRENT NATIONAL REGISTER ENTRANTS

Yolo County Historical Museum	512 Gibson Road	11/7/76
I.O.O.F. Building	723 Main Street	2/25/82
Porter Building	511 Main Street	11/30/78
Woodland Opera House	320 Second Street	11/5/71
Woodland Public Library	250 First Street	9/28/81
Yolo County Courthouse	725 Court Street	2/26/87
R.H. Beamer House	19 Third Street	7/29/82
Jackson Apartments	426 First Street	
Hotel Woodland	436 Main Street	10/21/94

CURRENT STATE POINT OF HISTORICAL INTEREST

Christian Science Church	450 First Street
---------------------------------	------------------

CURRENT STATE HISTORICAL LANDMARKS

Gable Mansion	659 First Street
Woodland Opera House	320 Second Street
Yolo County Historical Museum	512 Gibson Road

CURRENT CITY HISTORIC DISTRICTS

Gibson Mansion Historic Museum Property	512 Gibson Road
Woodland Opera House Property	320 Second Street
Yolo County Courthouse Block	725 Court Street

TABLE 6-2

CURRENT CITY HISTORIC LANDMARKS

Coleman House	611 North Street
Jackson Building	426 First Street
Traugher House	163 Second Street
St. Lukes Episcopal Church	515 Second Street

1989 - 1995 Heritage Home Awards

1989

Barrow	640 College Street
Bourn	9 Palm Avenue
Johnson	638 First Street
McWhirk	659 First Street
Nicolson	610 First Street

1990

Blevins	618 First Street
Geer	704 Elm Street
Hildebrand	754 First Street
Lawson	742 First Street
Marks	458 First Street

1991

Epperson	520 Cross Street
Ernst	41 Palm Avenue
Hansen	734 College Street
Laugenour	311 Gibson Road
Nassie/Crowhurst	422 Lincoln Avenue

1989 - 1995 Heritage Home Awards (cont.)

1992

Day	914 First Street
Fisher	667 College Street
Harvey-Keith/Davis	515 First Street
Joule	756 First Street
Van Hoecke	19 Third Street

1993

Buckingham	449 Pendegast Street
Dougherty	750 Second Street
Geist	714 West Keystone Avenue
Reimer	656 College Street
Tinsley	712 Second Street

1994

Ott	708 College Street
Mullen	815 College Street
Cairns	540 Cross Street
Leake	911 First Street
Brownson	55 Pershing Avenue

1995

Ebell	106 Bartlett Avenue
DeMaria	703 College Street
Scibienski	803 College Street
Arteche	725 Hollister Road
Pritchard	930 Second Street

Incentives can be developed to allow mixed uses of the interior of buildings restored to their former condition. The Historical Preservation Commission, working in cooperation with many of Woodland's private businesses, could explore new uses which can be made of the older commercial buildings in the downtown area.

Although often thought of as the nemesis of historical preservation, small development projects have provided the financial and legal framework for a number of historical preservation projects throughout the United States. In California, redevelopment projects in Sacramento and Napa have utilized the redevelopment process as a method of furthering historical preservation. Federal funding limitations, however, make this alternative less viable than those previously mentioned.

Building codes often presented physical and economical obstacles to the restoration and preservation of historical structures until the State Historical Building Code was adopted in 1979. These alternative regulations are now mandatory for qualified historic structures and they recognize the unique construction problems inherent in historic buildings.

An increasing number of private and public groups are providing a wide variety of incentives to historical preservation.

The National Trust for Historic Preservation was chartered by Congress in 1949 to further the national policy of preserving for public use America's heritage of historic districts, sites, buildings, structures and objects to facilitate public participation in the historic preservation movement and to serve that movement through educational and advisory programs and to accept and administer for public benefit and use significant historic properties. The Historic Preservation Act of 1966 provides funds on a matching basis to public agencies for restoration and preservation.

The National Endowment for the Arts has funded a number of restoration projects of unique architectural structures, private foundations such as the Rockefeller Foundation and the America the Beautiful Funds also provide financial assistance to interested communities. The primary prerequisite for receiving such assistance is an adopted plan for historical preservation and the establishment of an Historic Advisory Commission with authority in this area. In short, if the community is seriously pursuing the goal of preservation, it is more likely to receive outside assistance.

Local assistance is perhaps the most effective means of furthering an historical preservation program. Although funds may be limited, the City of Woodland, through a number of innovative programs, can provide a source of financial assistance. One of the most feasible methods would be participation in a revolving fund to purchase and restore historical structures. Once restored, these structures could be sold with appropriate deed restrictions and the funds used in other restoration projects. Other possible methods include fix-up loans, tool loans and similar self-help assistance. It is significant to note that, in the proposed Federal Housing Community Development Act of 1974 Grant Program, funds may be used for historic preservation programs.

Perhaps most important, throughout Woodland numerous small projects are undertaken each year by owners of older houses to maintain their beauty and utility. In the end, it is this private effort which can be the most meaningful because it is uncomplicated and direct. The City's Historical Preservation Commission could assist in this process by encouraging lending institutions and other groups to provide loans and other forms of assistance to these individual efforts.

OPERA HOUSE

The Opera House, opened originally in 1895, is a large brick structure representing turn of the 19th Century institutional architecture. Closed in 1913, the Opera House stood dormant for 57 years when it was reopened in 1970 to serve as a part-time community center and theater. From 1980 to 1983 the Opera House went through partial restoration. It has since reopened and operates on a temporary basis providing local community theater. The final phase of restoration, completed in 1989 has enabled the theater to attract varying types of performing groups, from local as well as regular resources. The theater seats 550 patrons and has an updated heating and cooling system to ensure the comfort of performers and the audience.

YOLO COUNTY HISTORICAL MUSEUM

The museum located on Gibson Road in the city is housed in the former home of the locally prominent Gibson family. The rooms of the house exhibit different periods of western American culture from 1850 through 1948. Adjacent to the house is a wash house, dairy room, and root cellar.

The land and house is owned by Yolo County; the museum is operated by members of the non-profit Yolo County Historical Museum.

The museum has exhibits of native California plants, trees, and shrubs and also includes an early California herb garden. Included with the permanent exhibits, the museum has a program of changing exhibits on varying topics. Past exhibits have shown period costumes, antique toys, and local Indian culture. Attendance at the museum averages 3,000 people per year, and has attracted a number of groups and individuals worldwide who wish to authenticate California history.

CITY HISTORY

General

Woodland today is still largely a "City of Homes" as it was known in the early 1900's. Factors contributing to Woodland's prosperity have been a rich soil and good climatic conditions, the relocation of the County Seat to Woodland and the establishment of good transportation systems. A brief history of Woodland helps in understanding the natural and man-made influences that created the unique character of the City.

In the winter of 1853, Henry Wyckoff settled in a dense grove of oak trees and opened a small store in Yolo City (now Woodland). Within a couple of years other businesses were established in the area. The favorable soil and unlimited attracted other settlers who found farming a profitable venture.

Among the early settlers was Major F.S. Freeman, who also opened a store. Later Major Freeman offered free lots to persons who would clear the land and build a home. Before long the settlement of Yolo City grew around what is now Main Street. In 1858, Major Freeman gained permission for a Federal Post Office to be built in the town and Yolo City was renamed Woodland.

In 1862, by a vote of 968 to 778, the Yolo County Seat was transferred from Washington (today known as Broderick in the city of West Sacramento) to Woodland. The courthouse was first located in Henry Wyckoff's store. In 1862, a combination courthouse and jail was built. This was damaged by an earthquake in 1902. A new courthouse was completed in 1918 and is still used for County business and the Superior Courts.

On June 25, 1863, Major Freeman recorded the first plat of the City. The northern portion of present-day Woodland was divided into blocks, lots and streets and this plat was the basis for future locations of buildings and streets. Sixth Street was designated as the eastern boundary; College Street was the western; North Street was the northern border and South Street (now Main Street) was the southern City limit. By 1870, the population of Woodland was estimated to be 1,600 residents but most of the oaks for which the town was named had disappeared. The City was incorporated in 1871.

In the late 1860's, the California Pacific Railroad Company constructed a rail line between Davisville and Marysville with a Woodland station in the vicinity of College Street and Lincoln Avenue. The rail line was later moved to its present location along East Street and became a part of the Southern Pacific Railroad System. The Sacramento Northern Electric Railroad Company began direct freight and passenger service to Sacramento from Woodland in 1912. In the 1920's, this line was acquired by Western Pacific. The depot was located at the corner of Main and Second Streets until it was demolished in the 1960's. The building was replicated in 1987. Today, both the Southern Pacific and the Sacramento Northern provide freight service to the industrial areas of Woodland.

Wood was the primary building material until approximately 1870. Two local brickyards began production of a soft brick in the mid-1860's. This resulted in a changeover of major building materials from lumber to brick as builders found it less expensive to use than imported lumber.

The period between 1880-1890 saw the initiation of City and utility improvements. The construction of an electric lighting plant and the installation of a locally-run telephone system occurred during this decade. Five gas lights were installed along Main Street and an official grade for streets and sidewalks was adopted to provide for level streets within the City. A contract was negotiated with R.H. Beamer for the construction of a municipal building to be used for City offices, the Fire Department and a jail. The City Hall, located at First and Court Streets, was completed in 1891. The building was reconstructed in 1936, enlarged in 1960 and 1975, and still serves the City.

The City of Woodland acquired the water works system and built a sewer system in 1891. In the mid-1950's, sewer capacity was reached. This resulted in a moratorium on all new building from 1957 to 1958. A bond issue was passed in 1959 which extended the sanitary and storm sewer system to serve the southern portion of the City. A similar bond issue was approved in 1963 to serve the northern part of Woodland.

The 1890's began with the worst storm the City had experienced in 30 years. This started a series of misfortunes. In 1892, a fire destroyed two business blocks, including the Opera House and the Exchange Hotel and one block of homes. The property loss amounted to \$200,000. In the early 1890's some local businessmen felt a streetcar line along Main Street to carry those who disliked the muddy street would be profitable. The system was one mile long and the streetcars were drawn by horses. The operation failed in 1896. A depression occurred between 1894 and 1896 causing other business failures and bringing the start of a railroad strike. This depression caused a decline in population from 4,523 to 4,392. By 1910, the population had climbed to 4,589.

By 1854, the Union Church building had been built in the cemetery. Little is known about this building except that it served as a meeting place for several churches and schools. The Christian Church, which organized in 1854, met in the Union Church until they dedicated the first church within the City Limits in 1866. A Roman Catholic Church was consecrated in 1869.

The Union Church building also served from 1855 to 1858 as the first public school. In 1858, a permanent school was built near the Southern Pacific Depot. The upper story of the school served as the Masonic Hall. In 1871, a new six-room brick school was started where Freeman Park now stands. The high school was located in the Hesperian College building until 1912 when a bond issue was passed to build a new high school. The Holy Rosary Academy was founded in 1884 and served as a boarding and a day school for girls in the primary and secondary grades.

Founders of the Christian Church also established Hesperian College in 1860. It was originally located south of Main Street on what is now Bush Street then later moved to a new facility near the northeast corner of College and Marshall. In its prime, it was a highly regarded institution of higher learning. The school, today known as Chapman College, is located in Southern California.

The first City Library in Yolo County was built with funds from the Carnegie Foundation. The Library, which was privately organized in 1874, was given to the City in 1891. The present library, designed by George A. Dodge and J. Walter Dolliver, was built in 1905 with Carnegie Funds, with subsequent additions in 1915, 1927 and 1988.

The Shakespeare Club of Woodland was organized in 1885 to study Shakespear an plays and the development of the drama. This women's club is the second oldest women's club in the State.

During 1896, a new Opera House was opened on the same street as the one which had been destroyed by fire in 1892. This turn-of-the-century valley theater was the source of great local pride and became the center for recreation and culture in the Woodland area. However, after the filing of a personal injury suit in 1913, the Opera House was closed and remained unused until - t was purchased in 1971 by the Yolo County Historical Society. It is now a part of the State Park System and is maintained and operated by the City of Woodland through the Opera House Board of Directors. Restoration is now complete.

The early 1900s were years of unusual building activity. In 1916, a building to house both the Bank of Woodland and the Yolo County Savings Bank was built at the northwest corner of College and Ma n Streets. This building with its Italian marble entry still stands but now houses a restaurant. Between 1909 and 1911 it has been estimated that about 200 homes were built in Woodland. A number of commercial and community buildings were also built. The Roth Building and St. Luke's Episcopal Church were constructed. The Physician's Building at Main and First Streets and the First National Bank Building were remodeled.

Wm. H. Weeks, one of the foremost architects of the time, designed a number of buildings in Woodland. These included:

1. Bank of Woodland and Yolo County Savings Bank, 435 Main Street, 1903
2. Carnegie Library Addition, 1915
3. County Hospital, 1920
4. County Jail, 1914
5. Dingle School, 1915
6. Elks Lodge, 500 Bush Street, 1926

7. High School, 1913-14, Auditorium and Gymnasium, 1925
8. Manual Arts Building, 1923
9. Hotel Woodland, 1928
10. McConnell Residence - 705 First Street, 1919
11. Old Maxwell School - 175 Walnut Street, 1916
12. Porter Building - 511 Main Street, 1913
13. Yolo County Courthouse, 1918
14. Yolo Fliers Country Club Clubhouse, 1920

He also designed a number of residences.

The Woodland Sanitarium, organized in 1911 by a nurse, was Woodland's first hospital. Physicians expanded the facility and by 1923, the Woodland Clinic Hospital was a functioning hospital. The Woodland Clinic Medical Group relinquished its proprietary interest in the hospital in the 1960's and the Woodland Memorial hospital became the City's first nonprofit community hospital.

Yolo General Hospital, the County Hospital designed by Wm. H. Weeks in 1920, is now the Yolo Health Alliance Peterson Clinic.

Woodland has benefited greatly from the success of the agricultural industry by serving as a center for banking, shops, education and in some instances by housing farmers and their help. Another important impact on the community and industry has been the invention and manufacturing of farming equipment. Local inventions included the centrifugal pump in the late 1800's and the Marvin Landplane in 1936 (Knights Landing). The Best Tractor was developed by the Best family who lived in Woodland although the tractor was actually manufactured in Oakland. Today several farm equipment dealers are located within Woodland and provide employment and tax revenues for the City while serving the outlying farms.

Irrigation was and still is a major contributor to the agricultural success of the area. The first irrigation canal was developed by James Moore in 1856 who owned exclusive water rights to Cache Creek which lies north of Woodland. Irrigation water today is provided by wells and the Yolo County Flood Control and Water Conservation District canals.

Money earned in the gold fields of California financed the purchase of much of the farm land around Woodland. A variety of crops were grown. These included: tobacco, peanuts, grapes, rice, sugar beets, various grains and row crops. Several wineries were located in the County producing wine, vinegar and brandy. The livestock industry also had an important role in the area. The Woodland Creamery was organized in the 1880's by citizens who recognized the local need for dairy products.

The opportunity for farming brought many nationalities to the area. The native Patwin Indian provided the first labor on the farms. They were replaced by Chinese laborers who came to Woodland in the 1860's during the building of the transcontinental railroads. After work on the railroads stopped, the Chinese labored on levee construction, fence building and truck farming. Some Chinese settled in Woodland and became prominent in the culinary and laundry services. Dead Cat Alley became the site of the Chinese community's homes and businesses. By the early 1900's, employment opportunities for the Chinese began to disappear and the Chinese population declined.

The Japanese were first brought to Byron Jackson's Yolando Ranch in the late 19th century as farm laborers, but eventually both Japanese men and women were employed as laborers throughout the county. Some Japanese started businesses in town such as barber shops and secondhand stores but a major handicap to the Japanese were the laws and public attitudes which made it difficult for them to own land or become citizens. Land was acquired by some Japanese who purchased it in their children's names. World War II saw the internment of Japanese families and their land leased to other people. For some Japanese, many years passed before they returned to Yolo County; others never returned.

Filipinos also provided farm labor and later the Bracero Program brought many Mexican Nationals into the area to work on the farms. Today, the Hispanic population has grown to approximately 20% of the City's residents.

As the City of Woodland grew, the need for city planning became evident. In the Spring of 1937, a City Planning Commission was created. A Zoning Ordinance was developed and adopted on July 18, 1938. In 1968, a new concern for aesthetics resulted in an ordinance requiring the undergrounding of utilities in new subdivisions. Since then, nine underground conversion projects have been completed. A General Plan was first adopted by the City in 1958 and underwent major review in 1962, 1967 and 1970. A new General Plan was adopted in 1979 following a five-year study and review process. It was updated in 1988.

CITY LAND-USE HISTORY

pp 6-14 to 6-17 should be in a different chapter, not Hist. Present.

A history of events leading to the present urban development that is Woodland is important for it lays the foundation for the existing land uses. Events such as the adoption of a Zoning Ordinance, the adoption of the General Plan, annexations and expansion of utility service along with the general needs and demands of a change society have affected the community

and determined the land use patterns. To better understand the existing land use characteristics, a review of the development of Woodland is appropriate.

Woodland was settled as an agricultural community around 1853. It became the County Seat of Yolo County in 1862 and has grown in its role as the major business and commercial center of the outlying rural communities in Yolo County.

The City of Woodland was first incorporated on February 22, 1871 and encompassed an area of 1.145 square miles. Its boundaries were defined by Beamer Street, East Street, a point south of Pendegast Street and West Street with a population of 1,600. This area included Main Street, the original center of the Community. To the north and south of Main Street, residences were constructed. The early residential areas have been defined in the Historic Preservation Element as areas of historic interest due to the number of old homes.

With limits to the north and south, the commercial area expanded to the east and west and the residential areas followed along with further expansion to the north and south. The pattern of a strip of commercial uses along the main thoroughfare was established early in Woodland's development and has continued with only minor expansion into the residential areas.

The present Highways 16 and 113 provided overland routes to surrounding farming communities, larger towns and to market.

The railroads played an important role in the development of the community for they brought improved means for transporting agricultural crops to market and for obtaining goods needed by local residents. The first railroad connecting Davisville (City of Davis) and Woodland was constructed in 1869. Gradually, the railroad expanded and was acquired by the Southern Pacific Railroad. The mainline track was relocated from College Street to the then eastern edge of the City.

Warehousing and industries requiring rail service located adjacent to the railroad and created an industrial area which still remains in the area between East and Fifth Streets. In 1913, a residential area for railroad employees was developed in the area referred to as the Armfield Subdivision, northeast of the intersection of East Street and East Main Street.

The first major step toward the provision of urban services occurred in 1891, with the passage of the first bond issue for the construction of a City Hall and the purchase of the water works and construction of a sewer system. The following year the first Building and Fire Zone Ordinances were adopted setting standards for public health and safety.

The first annexation occurred in 1912 with the addition of 159 acres south of Bartlett Avenue between East and West Streets. The area was developed in residential uses.

acceptable industrial distribution, research, administrative and professional activities and developments;

6. To encourage the highest use of good agricultural soils and the development of acceptable agricultural industry;
7. To realistically relate plans for the future to soils, water, drainage, topography, sewerage and transportation advantages and limitations and to human resources and the wishes of the people in order that a sound and orderly development built on a sound economic base may be accomplished guided by a plan.

The Land Use Element of the Plan addressed itself to seven basic uses of land; residential neighborhoods, commercial, industrial, agricultural, administrative and professional, government centers and public-special land uses. The Plan was not developed to a specific date but rather to the ultimate development of the area it included. It was based on the conclusion that the area could and would grow and develop as planned because the natural and physical features existed or were available. The Plan provided for a potential population of 56,350 on 2385 acres with provisions for second stage development areas located south and west of County Roads 25 and 98, the Monument Hills Area and north of Kentucky Avenue. These second stage areas were envisioned to allow for an additional population of 80,500 (49,000, 17,500 and 14,000 respectively).

The Master or General Plan was adopted by the Woodland City Council on August 4, 1958. The Plan envisioned rapid growth for the City. Growth has occurred but not as rapidly as was anticipated.

During the preparation of the Master Plan, a redevelopment agency was formed by the City Council for the purpose of developing a plan for the redevelopment of the downtown area but was later disbanded in 1961 due to local opposition.

Following the adoption of the Master Plan, the City began to implement a public facilities plan to provide for future development. A bond issue passed in 1959 provided for a southside sanitary and storm sewer trunk line system in Gibson Road. In 1963, a similar bond was passed for the northside providing a Kentucky Avenue trunk line system.

The southside truck line system opened the south area for development with full urban utility services west of Cottonwood Street and south of Gibson Road. These areas are now completely developed with medium density development along Cottonwood Street and the remainder in single family residential uses.

By 1930, the City had increased in area and population to 1.63 square miles and 5,542 persons. The decade presented new attitudes toward land use and development. In 1931, the first Uniform Building Code was adopted; in 1937, the first Planning Commission was appointed; and in 1938, the first Zoning Ordinance was adopted. This Zoning Ordinance identified four zones and their uses; one and two Family Residential Zone, Multiple Family Zone, Commercial Zone and Industrial Zone.

The 1940's saw the continued growth of Woodland but activities were somewhat slowed during the war years. At the close of this decade the City had reached a population of 9,386 and had expanded in area to encompass 1.89 square miles or approximately 1,209 acres.

A new Zoning Ordinance was adopted in 1949 which added a second Multiple Family Zone and included provisions for parking, civic improvement districts, building setbacks and administrative procedures.

The City of Woodland, as did the rest of the State, experienced extensive growth in the 1950's. The population increased during this decade by 4,000 persons to a population of 13,524 in 1960.

With the promise of new and increasing growth the Yolo County Planning Board was formed in 1955 to oversee the preparation of a Master Plan. During the preparation of this plan, in 1957 and 1958, a moratorium was declared on annexations and subdivisions by the City Council.

The Master Plan was prepared for the County as a whole with separate sections for each of the incorporated cities and their surrounding areas. The objectives of the Woodland Plan were stated as follows:

1. To preserve the high residential character and attractive qualities of family living;
2. To continue to provide urban services and expand trading and distribution facilities for the farm and ranch areas of the County;
3. To continue to provide a high type and quality of public services and facilities including schools, parks and public buildings;
4. To develop a more complete central business district and system of small neighborhood shopping centers to serve more completely the local and area shopping requirements with a high degree of convenience and service;
5. To provide for a greater measure of local employment and a varied and strengthened tax base through the encouragement of attractive and

The northside trunk line has provided increased potential for development in this area. New development has occurred west of West Street and north to Kentucky Avenue but only about 50% of the capacity has been utilized.

In August 1959, the plan lines for the Interstate 5 and highway 113 freeways were adopted and acquisition of the rights-of-way on the east side of the City was begun. Interstate 5 Freeway was opened in 1973. Construction of the State Route 113 Freeway connecting I-80 with I-5 was completed in 1990.

The City's Park Fund Fee Ordinance was adopted in 1960. This Ordinance was of particular significance because it provided funds for acquisition and development of a system of neighborhood parks in residential areas and community wide recreation facilities including ballparks and swimming pools to serve the community as further described in the Parks and Recreation Element.

In 1974, the City Council appointed a 38-person citizen's committee called the Woodland Area General Plan Citizen's Advisory Committee (WAGPCAC) to assist the Staff in the preparation of a new General Plan. The plan consisting of 11 elements took four years to complete. One year of study meetings and public hearings followed before adoption on August 7, 1979. A total of 170 meetings over a five-year period were held.

A new Subdivision Ordinance was adopted in 1981 replacing the ordinance adopted in 1954. This Ordinance is periodically amended to reflect changes in the State Subdivision Map Act.

A new Zoning Ordinance was adopted in 1983 to implement the 1979 General Plan. Density and development standards were modified and several new zoning categories were created and others were eliminated.

The Redevelopment Agency was reactivated in 1985 and a Redevelopment Plan has been adopted by the City Council and the Agency. The Redevelopment Agency has been actively pursuing revitalization and reinvestment in the downtown in the following areas: Development and adoption of a Downtown Specific Plan (1993), adoption of a Redevelopment Plan (1989), the investment of 1.25 million dollars in streetscape improvements along Main Street and the Heritage Plaza (1990).

During the past 30 years, the City has seen extensive residential growth to the south and west and more recently east of East Street. Commercial development has extended westerly along West Court and West Main Streets and along East Main Street. County Fair Mall, the new regional shopping center at East Street and Gibson Road opened in 1986. Industrial development has shifted from along West Kentucky and along East Street to the northeast area.

In 1988 the City Council approved a General Plan update for the City which altered the development phasing of the previous plan to open up residential development East of

MARY

area previously planned for major new residential
development. The 1988 General Plan was unique in that it
offered a detailed means of determining service

the Southeast Area Specific Plan which was a master plan for the
residential area on the East side of Woodland South of I-5. The
sites, commercial areas, apartment sites and low-density
a future population of up to 6,700 persons. This was the largest
and annexation ever approved by the City. Residential construction
under way. The City has continued to attract large warehouse type
or major corporations most recently Mazda and Walgreen Drug Stores.

1990 Census, 61 percent of Woodland's labor force worked in Woodland,
Woodland is still an employment center and not a bedroom community.

has maintained its administrative offices in the downtown area on the site of the
City Hall at First and Court Streets. The Woodland Public Library was recently
renovated and expanded. The County Courthouse and new Administrative Center on Court
Street remain the focal point of County government but a number of the offices,
departments and services have been located in the area of West Beamer and Cottonwood
Streets.

Other activities of particular significance have been the completion of the Historical
Resources Inventory; Noise Attenuation Study for Residential Areas; Storm Drainage,
Water and Wastewater Facilities Master Plans; and the Downtown Specific Plan.

Other areas within the General Plan Area but outside the City limits that have developed are
the Willow Oak and the Hillcrest/Monument Hills Areas. Both these areas have experienced
growth although the latter has grown more rapidly due to its location on non-prime
agricultural soils. During the past 25 years, due in part to the County's hesitance to divide
valuable prime agricultural land into five acre or smaller parcels for rural residences, there
has been a demand to divide this marginal agricultural land into one to five acre parcels.
The County of Yolo has actively participated in the general provisions of the Williamson
Act and has been utilizing an Agricultural Preserve Zone (AP) throughout the County to
protect the agricultural resources of the area.

The 1990 U.S. Census set the City of Woodland population at 39,802 persons. The
following table shows the growth pattern of the City during its history:

*This subsection
belongs in a
different chapter*

TABLE 6-3

CITY OF WOODLAND POPULATION AND LAND AREA SUM

YEAR	POPULATION	AREA (IN ACRES)
1871	1,600	736
1890	3,069	736
1900	2,886	736
1910	3,189	736
1920	4,147	895
1930	5,542	1,043
1940	6,637	1,058
1950	9,386	1,209
1960	13,524	1,527
1970	20,677	3,148
1975	25,445	4,061
1980	30,235	4,285
1987	34,862	5,900
1988	36,941	5,900
1990	39,802	5,980
1994	42,474	6,600

Sources: 1988 General Plan Data Base, City of Woodland Planning Commission and City Council Minutes, City of Woodland Building Permit Records.

ETHNOGRAPHIC OVERVIEW

Much of this material is questionable; some is wrong

The Woodland study area had initially been held by the Poo-e-win, a dialect group of the Patwin or Southeastern Wintan (Merriam 1966-67, 3:267). Our knowledge of these Poo-e-win is somewhat sparse compared to what is known about other neighboring Indian groups owing to several factors:

Hill people

Treated as a broodst of ethnography NOT recognized in recent literature

1. The proselytization and enslavement of the Poo-e-win by the Spanish missionaries, which had the effect of vastly reducing their numbers through hardship and disease. This practice also may have led to a virtual loss of ethnic memory due to near-complete loss of oral histories.
2. The malarial epidemic of 1830-33 and the smallpox epidemic of 1837 decimated much of the surviving population.

Thus, when the establishment of Woodland took place in the late 1850's, there would have been very few Native Americans occupying their traditional environments. One historical document does mention that the first laborers used by the earliest farmers of Woodland were the native Patwin peoples. This suggests that there may still be Patwin-speaking people resident in or around Woodland who might be able to provide first-hand accounts of White-Indian relations in the early American period.

Salt Pome Nintu

What information we do have comes from Indian informants living around Colusa, Rumsey, Cortena, Stonyford, and Grindstone (Elk Creek) (Kroeber 1932:254). This data should be understood to reflect the remembered lifeways of a semi-acculturated people whose knowledge and understandings of their pre-contact culture has been diluted and altered through the loss of a major portion of their population as well as the enculturation of the Patwin to the lifestyle of Western European culture.

The Poo-e-win, as most Patwin groups, occupied the major river courses and tributary drainage's of their territory, such as the Sacramento River, Cache and Putah Creeks and in some instances, at springs. In these areas only places which had an elevation sufficient to keep them above the rising waters of seasonal floods would have been selected for permanent villages (Kroeber 1932:254-255). These permanent villages served as a base of triplet consciousness with which all its members identified. Even if the "mother" village were re-located, the people's identification stayed with the triplet (Kroeber 1932:258-259). An example of this sense of community would be the Poo-e-win triplet of the Yo'doj which at one time occupied a large village in the town of Knights Landing.

From these permanent villages, the various family groups could utilize (exploit) the varying resources of several environments. These environments are:

1. Streams and marsh lands for salmon, sturgeon, perch, water fowl, mussels, and tules as well as other vegetable products which served not only for food but also as construction materials.
2. The riparian zone from which vegetal as well as animal products and raw materials for building could be drawn.
3. The valley woodland and prairie communities offered antelope, deer, elk, rabbit, doves, and quail. From the vegetation standpoint, abundant harvests of wild seed from the family Composite (sunflower) in addition to *Alfilaria*, wild oak (an alien dating from 1779) and bunchgrasses. It was also from this valley woodland community that acorns were collected.

No such word - triplet

No such plant as wild oak

What is this?

Although sufficient fresh water sources are presently lacking in the Valley, the valley woodland and prairie communities, which constitute much of Woodland's MEA area, would have been a particularly attractive area for hunter/gatherers. It is more than likely

not necessarily unlikely

have been present in this region, and so too, Paleo-Indian big-game hunters. The implications of this find on archaeology in Woodland will have to await address in future documents, when data are more plentiful.)

The Woodland study area was most probably the locus of temporary hunting and seed gathering camps established for the harvesting of acorns among the oak stands and gathering of edible seeds from the plants of the prairie. In addition, the area provided a likely source for hunting antelope, deer, rabbit, and quail. However, it is unlikely that any concentrated remains of these activities will be documented in the literature owing to the temporary nature of these encampments and the nature of the prevailing historic land use patterns (leveling and filling for cultivation). Had Native American structures been present (at least during the contact period), they would have been a simple rectangular roof held up by four poles, a summer structure later called a ramada by the Spanish (McKern 1923:171). Tools carried and used at such an encampment would be only those necessary to perform the required task (McKern 1923:171).

write

Historic land use, predominately cultivation, although grazing of livestock also took place, can be expected to have re-distributed aboriginal cultural materials within the study area unless deeply buried by alluvium. Historic accounts of both Spanish and later white settlers in the study area fail to make special mention of Patwin informants, except to note that they served as farm laborers. Much more important to the early European visitors to this area, as indicated in the diaries and expedition notes, were the permanent villages situated along the major drainage's, which would have supplied (either willingly or through force) supplies and labor for both Missionary and land owner alike. The Yolo County Historical Society had pointed up the need for research to be centered upon the early Spanish diaries, in order to discover details of "the ancient Patwin Indian culture" (1970:D).

EXTANT PREHISTORIC RESOURCES IN THE STUDY AREA

not a verb

Complete field examination of the Woodland study area was not carried out as a part of this report. Instead, this study involved a search in the literature for details on known or suspected potential prehistoric resources, which might be impacted by any proposed change in land usage. A search of the records of recorded prehistoric sites for Yolo County, housed at the Regional Clearinghouse at the University of California at Davis, showed no recorded sites within the project boundaries. This however does not rule out their existence, either at unknown springs or possibly along the earlier shores of Cache or Putah Creeks. We feel that this lack may be due in great part to the very small sample of area surveyed within the study area. This lack of specific concern in this area on the part of the archaeological community may be due in part to the temporary nature of settlements potentially to be found in Woodland whose physical remains are often less manifested in the record or extremely subtle.

write

not the official OHP Clearinghouse in many years. Documents were made.

unattached clauses dependent

San Jose State University 6-23

extended
tical
sufficient
appropriate

Temporary encampments are poorly understood even today by the archaeological community. There is more information extant on the criteria for selection of permanent village than on temporary camps, particularly because researchers are often drawn to sites containing sizable quantities of aesthetically pleasing goods associated with burials of high status individuals, rather than the often technologically simple, uni-purpose gathering or processing camp.

Pure baloney

POTENTIALLY SENSITIVE AREAS TO PREHISTORIC RESOURCES

is is
badly
often

Without field examination, this study cannot empirically state where prehistoric resources should be found, if present. However, there do appear to be certain spots which potentially could contain prehistoric deposits, albeit potentially out of context due to historic land modification, which should be further investigated.

1. All areas where possible pre-Pleistocene and/or Holocene watercourses may be buried by alluvium. These areas can best be discovered through geological investigations, and their locations re-visited by an archaeologist, to check for buried paleosols, megafaunal fossils, or stone implements. If indications of buried drainage s are found in the study area, typical archaeological surface reconnaissance may be insufficient to observe them. A program of random monitoring of trenching activities in these potentially sensitive areas could be used to recover such finds and recommend future protective measures.
2. Any area where a grove of native oaks are present, or where stands of native grasses still remain, could be sensitive to prehistoric utilization. Recently proposed State legislation seeks to protect and preserve areas where Native Americans gather raw material such as grasses, seeds, quarry rock and shellfish for food, implements, or ornament. A precedent has been set with the establishment of a grove of native oak trees near the Nelson Ranch as a significant historic resource by the YMGA of Woodland. Examination of similar groves of oaks as well as certain kinds of ethnically significant trees such as the Tree of Heaven (to the Chinese) could help increase the data base appreciably.

these reside in
near - and know

participation

is so
possible
bigger
min 100!

The present White community in Woodland needs to be canvassed about their knowledge of prehistoric materials being recovered during plowing and other such activities in the Woodland area. During our brief physical examination of the study area, we failed to find any resident who had ever found prehistoric artifacts. This does not mean that isolated artifacts have not been found, or will not be found, in soils disturbed by agricultural or construction activities. It just means that research did not go deep enough. Particularly important would be an attempt to canvass the resident Native Americans, of which the 1975 census enumerated 39 households and 98 persons, to seek information on their tribal affinity and remembrances of Woodland or their past homelands. It appears that Native

that this area functioned as seed collecting tracts which would have been the personal property of individual families of the tribelet, as well as the gathering place for Valley oak acorns (Kroeber 1932:276). It also could have functioned as hunting territory for large terrestrial mammals as well as migratory fowl, who would have congregated in the tule swamps or at the edge of vernal pools.

Of an especial importance ^{basin?} to the Poo-e-win and their neighbors was a main trading trail between the Clear Lake Park region of the Pomo and the Sacramento River of the Patwin and Nisenan, which followed the course of Cache Creek. ^{basin?} ~~Cover~~ this route the Patwin traded woodpecker scalp belts, cordage, shell beads, sinew backed bows and yellow hammerhead bands in return for shell and magnesite beads, salt, obsidian, fish, and clamshell. This trade route served an important means of cultural and social interchange in addition to a vital economic supply line for the Patwin and their neighbors to the north, the Nomlaki, to the east the Nisenan, and to the west the Pomo (Davis 1961:34-35).

The Plains provided an abundant source of seed plants and grasses. Principally, these plants ~~are~~ are represented by members of the family Composite (sunflower), although such foodstuffs include buttercups, alfilaria, bunchgrass, and to a lesser degree, wild oats (Powers 1877; Kroeber 1932:276; Palumbo 1978:355). These plants were harvested either by beating or cutting the seeds from them into a gathering basket. Having prepared a smooth section of ground, the seeds were thrashed and then winnowed in the wind. These could then be either eaten unprepared or parched with hot coals in a basket or ground into a flour from which they could make bread or soup (Powers 1877).

The acorn was gathered in the fall from the valley oaks. Ground in a wooden mortar made of an oak bough, the flour was leached of its bitter tannin in a sand basin. This flour could then be cooked as bread in an earth oven or boiled with hot stones in a basket to make soup (Kroeber 1932:275). Various herbs, seeds or meat could be added to create different types of soups or mush. ^{F. could be made}

^A seeds and acorns were stored in granaries seven to eight feet tall and six to seven feet in diameter. These were layered on tule mats and included dried salmon and various other dried meats (Kroeber 1976:275).

The dry lands of the plains were also used for hunting deer and antelope during the winter months (Powers 1877). Here a net about six feet wide and up to 400 feet long was stretched out and deer driven into it to be killed (Kroeber 1932:277-278).

Woodland, although sitting on a slight elevation which afforded dry ground during seasonal flooding, does not have sufficient water resources, in terms of magnitude of streams or rivers, which would have been sufficient to permit permanent villages. It is important, however, to consider a thorough examination for possible natural springs or sinks and relict water courses which might have afforded SUtable living conditions for the earliest inhabitants of the Central Valley in this region. (A recent paleontological discovery along the south side of Cache Creek, that of a mastodon skeleton, suggests that megafauna may

Americans constitute an unspoken resource in the search for data on potential cultural resources, or areas sensitive to such resources, in the Woodland study area. Their future involvement in cultural resource inventory programs and interpretation should be sought and incorporated to the fullest extent possible. We might add, other ethnic groups, who presumably entered Woodland during the historic, post-contact era also need to be better understood.

- 1. I know of a significant site in Faria Park subdivision.
- 2. What mechanism does the city have to deal with significant cultural resources found during construction?

- a. Prehistoric site in Faria Park found as a result of construction.
- b. Trrenching in Dead Cat Alley several years ago - I identified a significant historic feature relating to Woodlands Chinatown.

Please address this problem. What process is in place or does the City need to develop one?

- ◆ Thirty-six percent of respondents indicated a preference for the child care center to be located closer to home. Twenty-two percent indicated they prefer the center to be located closer to the child's school, while 11% prefer the center to be closer to their workplace.
- ◆ Twenty-five percent of the surveyed families indicated that before school child care is a problem for them.
- ◆ Many families indicated that the transportation of children between child care, school and home is a major issue to them.

In 1994, the Child Care Commission completed the Child Care Master Plan. This Master Plan is intended to be utilized in the preparation of the General Plan. The Master Plan contains policies that are recommended to be included in the General Plan. It includes policies related to Circulation, Land Use, Housing, and Safety.

In 1994, there were 136 licensed day care providers in Woodland. Of these licensed providers, 125 of the facilities are located in private homes.

5.6 CULTURAL EVENTS AND ACTIVITIES

Woodland Opera House State ^{Historic} Park

The Woodland Opera House was established in 1885. Most of the building, along with an entire city block, was destroyed in the great fire of 1892. After its reconstruction at the turn-of-the-century, it became the cultural hub of the region. In 1976, the Woodland Opera House was declared a state historical park. The Opera House was restored in 1989 and is now a functioning facility for the performing arts. It is open to the public for tours Tuesdays 10:00 a.m. to 3:00 p.m. Appointments for tours can also be made two weeks in advance, Tuesday-Friday between the hours of 9:00 a.m. and 5:00 p.m. The Woodland Opera House is a charter member of the League of Historic American Theaters.

Yolo County Historical Museum

*outbuildings
house
shed*

The Museum, situated on two and a half acres of towering trees, historical plantings and lawn is the former home of William Byas and Mary Gibson. The rooms of the mansion exhibit different periods of western American culture from 1850 through 1948. Adjacent to the mansion is a wash house, dairy room, and root cellar. Included with the permanent exhibits, the museum has a program of changing exhibits on varying topics. Past exhibits

temporary redundant

have shown period costumes, antique toys, and local Indian culture. Attendance at the museum averages 3,000 people per year, and has attracted a number of groups and individuals worldwide who wish to authenticate California history. The museum and land ^{are} is owned by Yolo County ^{land} and is operated by members of the non-profit Yolo County Historical Museum. Located at 512 Gibson Road, the museum is open to the public on Monday and Tuesday, from 9:00 a.m. to 5:00 p.m., and Saturday and Sunday from ~~noon~~ 12:00-4:00 p.m. ^{parcel project}

Yolo County Historical Museum Events and Activities:

- ◆ May Festival-annual event held on the third Sunday in May. Featuring homemade crafts from local artisans, entertainment, games, and displays.
- ◆ Christmas Bazaar and Open House-annual event featuring homemade foods and crafts, decorated trees and wreaths, bazaar items, and gift shop merchandise.
- ◆ The ~~park~~ ^{? grounds are} is open during regular museum hours for picnicking. ~~The grounds~~ ^{and} are available, on a fee basis, for weddings, receptions, family reunions and other group activities.

of a "park" mention of a "park" no prior

Hays Antique Truck Museum

a privately-owned facility

The Hays Antique Truck Museum houses the largest collection of antique trucks in the United States. More than 100 restored vintage vehicles representing more than 93 makes are on display. Visitors can see solid rubber tires and other unusual items dating from 1901 to 1950, as well as exhibits tracing the history of the trucking industry. The museum is open ~~every day~~ ^{daily} from 10:00 a.m.- 5:00 p.m.

Stroll Through History

a committee of the Woodland-Downtown Association

The Stroll Through History is an annual event sponsored by the "Neighbors for the Historic Preservation". The event includes a walking tour through beautiful historic neighborhoods and business areas. The historic homes featured in the Stroll are ~~Victorian homes, Queen Annes, Eastlakes, Italianates, and colonial revivals architecture.~~ The Stroll Through History is an eventful day with many activities which include:

consist of a variety of Victorians, Queen Annes, Eastlakes, Italianates, bungalows and walking clubs, vernacular residences.

- ◆ Paid tours of 6 to 8 Victorian and Period homes and gardens.
- ◆ Antique car show and antique fire engines.

- ◆ Horse and Carriages, antique bicyclists and people dressed in Period costumes.
- ◆ Demonstrations of historic crafts, dancers, brass bands and other musical entertainment.
- ◆ Crafts fair and Antique-Renovator's Show.

Oktoberfest

The Oktoberfest is jointly sponsored by the Rotary Club of Woodland and the Woodland Opera House. The event is held at the Heritage Plaza area in downtown Woodland. Entertainment includes German bands and Bavarian dancers performing throughout the day and evening. Our very own Burgemeister presides over the two day event by encouraging audience participation in the "chicken dance" as well as many other activities. A craft fair provides "hand made only" crafts for the public to browse through and purchase. Activities available for the kids include bounce houses, hot air balloon rides, carnival games, face painting, and much more. The food and drink are authentic German fare with bratwurst, sauerkraut, and strudel.

Annual

Woodland Chamber of Commerce Events

- ◆ ~~Annual Meeting-Yearly event~~ held in January, designed to install and introduce the Chamber Board of Directors to our members and the community. The Chamber's Member-of-the-Year is also acknowledged as are area businesses.
- ◆ ~~Crab Feed-Annual event~~ in February held at the Yolo County Fairgrounds.
- ◆ Trade Show and Business Expo-Held in conjunction with the monthly Business After Hours Mixer. Woodland area businesses come to showcase their wares and advertise their business. Function is held at the Yolo County Fairgrounds in the Exhibition Hall.
- ◆ Woodland on the Grow Tour- ~~Annual event~~ held in early Fall, designed to inform regional developers, decision makers, and members on Woodlands' continued growth. The ~~tour~~ also includes a walking tour through one of ~~our~~ local manufacturing or distribution centers and a lunch meeting with a celebrated speaker.
- ◆ Business Education Day-Event structured to allow ~~today's~~ educators an opportunity to view and experience first-hand the changing workplace by touring local businesses.

- ◆ Industrial BBQ-A long-standing Chamber event and community tradition celebrating industry and business throughout Northern Central California. This informal event acknowledges our communities industrial and service firms. It is held the 1st Thursday in June. *the regions*
- ◆ Golf Tournament-This sell-out annual event is held on the last Friday in July. The tournament is followed by a dinner and awards ceremony.
- ◆ BET BBQ - Business and Education Together. Annual event is held in early March. Teachers and business people participate in ~~the~~ ^{the} event. It not only welcomes ~~new~~ educators ~~and existing educators~~, but also recognizes specific businesses for their long-standing commitment to education.
- ◆ Farm City Banquet-Annual event designed to honor agriculture and its importance to the community. Awards are given to the Agri-Business Person of the Year, the County's Outstanding Young Farmer and the Future Farmers of America leader of tomorrow. ~~Various~~ ^{various} businesses provide an arcade of agricultural games to play prior to dinner. Held the fourth Thursday of the month.
- ◆ Board of Directors/Committee Chairs Planning Session - An annual weekend meeting in November, conducted to review current Chamber programs, plan constructive changes, and explore new ideas for the Chambers growth and development.
- ◆ Harvestfest, Wine Train Trip - An annual event promoting rural tourism in Yolo County. Includes tasting of local wines, musical entertainment, and products of our ~~burgeoning~~ ^{microbrewery} industry, *and*
- ◆ Christmas Parade- Woodland's invitational ~~Christmas Parade~~ ^{Parade} is held in December and is supported by local businesses. The parade ~~route runs down~~ ^{route runs down} Main Street with over 200 floats, military units, horses, antique vehicles, marching bands, and Santa Claus. Over 18,000 people ~~view the festive Woodland Christmas Parade.~~ ^{attend this festive event.}

Hispanic Chamber of Commerce

- ◆ Noche De Ronda - Annual cultural event in March held at the Woodland Opera House. The event features the Mariachi Los Arrieros band and young talent performing Hispanic dances and songs.
- ◆ Co-sponsor of the Hispanic Student Leadership Recognition event - This dinner event is held in May.
- ◆ Fiesta De La Familia - An annual event held on the last Sunday in June. ~~The event features~~ ^{featuring} Folklorico Dancers, Mariachi, food, demonstrations of boxing, and ~~the~~ ^{the} martial arts.

~~Kwon Do.~~ In addition ~~the~~ Hispanic Chamber of Commerce awards \$500 scholarships to sixteen deserving students at this event.

- ◆ In August, the Hispanic Chamber sponsors the Hot August Cruise Night best model car competition.
- ◆ ~~In December~~ ^{In February} Christmas Baskets ~~in December~~ are given to five needy families. The baskets include food, toys, and clothing.
- ◆ The Hispanic Chamber is also involved in the Woodland Beautification project. Several young people, under the guidance of Chamber members, ~~have taken to painting over graffiti.~~ A ~~vast~~ mural depicting the Virgin de Guadalupe has been ~~completed~~ ^{completed} on the north wall of ~~Contadina~~ ^{the} building facing Lemon Street.

Yolo County Fair

The Yolo County Fair is a five-day event held during August at the Yolo County Fairgrounds in Woodland. The history of the ~~Yolo County Fair~~ ^{Yolo Fair} goes back to the late 1800s and is somewhat ~~unique in California~~ ^{unique} in that it is one of less than half a dozen fairs in California that operates with a free gate. More than 140,000 people attend the ~~Yolo County Fair~~ ^{Yolo Fair} which continues to preserve a rural old-fashioned atmosphere. ~~The Yolo County Fair~~ ^{Yolo Fair} activities include amusement rides, concerts, horse shows, rodeo, pig racing, various demonstrations, judging in livestock, craft, art, cooking, agriculture produce, and quilts, Body Building Contest, Destruction Derby, and the Miss Yolo County Pageant.

Hot August Cruise Night

The Hot August Cruise Night is an annual event held on the first Saturday in August. The first August Cruise Night ~~was~~ started in 1979 as an informal gathering of a few friends and their custom cars and hot rods. The Cruise Night is one of Woodland's biggest events, bringing ~~30,000-35,000~~ ^{30,000-35,000} people ~~from all around~~ ^{from} and approximately \$1 million dollars in revenue to Woodland. In 1993, the event was extended ~~to encompass~~ ^{from} two to three day ~~event~~ ^{event}. The Cruise ~~event~~ ^{event} includes a Prom held at the Hotel Woodland on Friday, ~~the~~ car show, cruise, concerts, ~~Craft Fair~~, Custom Bicycle and Motorcycle show held at Freeman Park on Saturday, and on Sunday, ~~the~~ pancake breakfast at Crawford Park and a Poker Run. Local charities, fund raising groups and service clubs all participate by providing volunteers. Money raised from this event is distributed to local charities and City programs.