CHAPTER 10

ALTERNATIVES AND OTHER MANDATORY CEQA SECTIONS

10.1 INTRODUCTION

This chapter of the *EIR* addresses several topics that the *CEQA Guidelines* specifically requires be discussed in all EIRs. These are alternatives, significant irreversible effects, growth-inducing impacts, cumulative impacts, and mitigation monitoring. The *Guidelines* indicates a preference that these subjects be discussed in separate sections or paragraphs, but allows for the inclusion of a table showing where each of the subjects is discussed within the EIR. This chapter combines the two approaches, with separate discussions of each mandatory topic and references to appropriate sections elsewhere in the *EIR* for elaboration on the discussion included here.

10.2 REQUIREMENTS FOR ALTERNATIVES

The following paragraphs discuss the requirement of State law that EIRs include descriptions of the alternatives to a proposed project that have been considered. The first section describes the general requirements of CEQA and the second section summarizes the directions of the California *General Plan Guidelines* with respect to the consideration of alternatives in general plan projects.

CEQA GUIDELINES

According to the *CEQA Guidelines*, an EIR must "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." (§15126) Following are the directions that the *CEQA Guidelines* provide regarding the discussion of alternatives within an EIR.

(1) Purpose. Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (*Public Resources Code* §21002.1), 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.

(2) Selection of a range of reasonable alternatives. The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic purposes of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Additional information explaining the choice of alternatives may be included in the administrative record.

(3) Evaluation of alternatives. The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effect of each alternative may

be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail that the significant effects of the project as proposed *(County of Inyo v. City of Los Angeles, 124 Cal. App.3d).*

(4) "No project" alternative. The specific alternative of "no project" shall also be evaluated along with its impact. The "no project" analysis shall discuss the existing conditions, as well as what would be reasonable expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

(5) Rule of reason. The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant impacts of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making.

GENERAL PLAN GUIDELINES

The *General Plan Guidelines* further elaborate on CEQA's requirements as they pertain to the preparation of general plans, stating as follows:

> For any set of goals and objectives, there will be a number of possible courses of action a community may pursue. Alternative plan proposals should be developed and tested at this stage to enable a community to examine its possible planning scenarios. Besides the goals and objectives, the varying plans should consist of alternative sets of principles, policies, standards and plan proposals.
>
> The nature and detail of the alternatives will depend upon the extent of the planning program. For new general plans and comprehensive general plan revisions, the alternatives will often focus on population levels and on the scale, location, and type of development. The alternatives in a more limited planning program, such as for a single element, will deal with a narrower range of options. To the extent possible, the alternatives should be developed with implementation measures in mind. This will ensure the feasibility of the basic policies.
>
> The alternatives need not be mutually exclusive. Ultimately, the decision makers may select an amalgamation of two or more alternatives as the best choice.

10.3 SELECTION OF GENERAL PLAN ALTERNATIVES

As a practical matter, because of the comprehensive nature of the general plan, the policy and program alternatives that could conceivably be combined with these land use alternatives are infinite. For most policies in the plan, there is at least one alternative, and for many, if not most, individual parcels of land, there is at least one feasible alternative land use designation. The evaluation of the impacts of all these alternatives and their many combinations is simply not feasible or useful. For purposes of satisfying the spirit of CEQA's requirement to address alternatives, this *EIR* identifies feasible alternatives, focusing on land use

alternatives for those areas where the *General Plan* proposes major changes in planned land use and in those areas where the *General Plan* has been identified as having the greatest environmental impact.

In connection with the General Plan Update, the City of Woodland conducted workshops to consider the direction of City expansion, population densities the community desired or could support, and long-term population and employment projections. The primary focus of this process was to evaluate the potential implications of future growth and to develop realistic development scenarios. The development scenarios considered and the evaluation conclusions reached are summarized as follows.

POPULATION GROWTH ALTERNATIVES

The issue of population and employment growth was one of the most critical factors in the General Plan update process. The City considered forecasts prepared by the Sacramento Area Council of Governments (SACOG) and conducted two absorption studies for residential and nonresidential development prepared to assess the land requirements to accommodate projected population and employment growth. Ultimately, the City selected a population target of "no more than 60,000 in the year 2015," with a residential holding capacity of approximately 66,000 for Woodland in the year 2020. Based on SACOG forecasts and assumptions about residential demand, the General Plan also projects employment in Woodland to increase from 15,367 in 1994 to 35,000 in 2020. The alternatives in this EIR therefore look at different land use configurations for accommodating projected growth, in addition to the possibility of limiting growth through limitations on available land.

The City chose as its preferred alternative a General Plan that would respond to market demands and include adequate land to accommodate projected population and employment growth through 2020. Additional land for industrial development was designated recognizing the variation in individual businesses requirements for location and parcel sizes, in order to promote economic development and avoid limiting future employment in Woodland.

LAND USE ALTERNATIVES

Woodland has an Urban Limit Line established by the *1988 General Plan* and acknowledged by the Urban Development Policy jointly adopted by the City of Woodland and Yolo County. This new *General Plan* includes additional unincorporated land to the north and southeast within the Urban Limit Line. Although these areas include prime agricultural lands and some territory to the north is within a 100-year floodplain, the City has had a long-standing policy that these areas would be ultimately annexed and urbanized. The City did not therefore consider it a reasonable alternative to remove any land from within the existing Urban Limit Line as part of the General Plan Update. Therefore, all alternatives examined in this EIR (with the exception of the "No Project - No Development Alternative") include all land within the existing (1988) Urban Limit Line.

Projected population growth cannot be accommodated by the limited amount of residentially-designated lands identified by the existing *1988 General Plan*. Therefore, the City determined to assess potential land use pattern alternatives for accommodating the projected growth in newly designated residential areas beyond the current Urban Limit Line. The range of land use patterns considered is summarized below.

Western Growth: The potential for growth to the west of the existing city of Woodland was eliminated early in the selection of land use alternatives. Historically, Woodland has not considered urban growth west of County Road 98 because of the prime agricultural lands and lands in Williamson Act contract west of CR 98, and because the City's wastewater collection system cannot serve this area because of the gravity system

and capacity of its trunk lines. Therefore, additional development to the west was not considered a feasible alternative for future urban growth.

Northern Growth: Some vacant and agricultural land north of the city limits is included within the current Urban Limit Line. The area north of the existing Urban Limit Line was ruled out as a feasible alternative as this land is Class I prime farmland and, according to the U.S. Army Corps of Engineers' *Westside Tributaries Study* (March 1994), is subject to higher flooding potential.

The area north of Kentucky Avenue designated for residential uses in the *1988 General Plan* was reevaluated, with the conclusion that is was not the appropriate location for future residential growth because flood studies indicated that this area would be subject to flooding from Cache Creek. Therefore, lands north of Kentucky Avenue between the Southern Pacific Railroad Main Line and Road 98B were redesignated in the preferred alternative for industrial and commercial service uses with an emphasis on agricultural research and biotechnology uses to support the agriculture in the vicinity. Some additional industrial expansion of the existing industrial area in the northeast area was considered appropriate, since this area is predominantly lower quality soils and industrial development can be designed and constructed with flood protection more easily than residential development.

Eastern Growth: The City considered growth to the east through many Planning Commission and City Council workshops. One of the chief arguments for growth in this direction is that the area consists predominantly of lower quality Class III and IV soils that are not considered prime farmland. In addition, this area includes the City's 900-acre industrial wastewater facility, and the City considered the potential for relocating this facility and possible benefits of urban development of this property. Property owners in this area also expressed the desire to develop this area and an area further east.

Because the City has adequate land in already designated and newly designated areas to accommodate projected nonresidential development, the alternative examined for this area was extended east as far as would be required to accommodate residential population growth through 2020. Designating additional land to the east for development (beyond what is included in the Eastern Growth Alternative) would create a greater land supply than would be required to accommodate projected growth through 2020, and could result in inefficient development patterns or be growth-inducing.

This area also includes several concerns in respect to future development. Most of this area east of the domestic wastewater treatment plant is designated in the 100-year floodplain according to FEMA. The location of the wastewater treatment plant also raised concerns related to compatibility of adjacent development with an existing heavy industrial use. In addition, the wastewater treatment facility would create a substantial barrier to urban expansion east of County Road 102. Developing to the east would require extending future development around and beyond the domestic wastewater treatment plant, creating a discontinuous development pattern and an isolated enclave separate from the existing community.

The economic feasibility of relocating the industrial wastewater facility also raised several concerns. The facility was developed with the assistance of a federal grant, and whether or how much money would need to be repaid to the EPA is unknown. An alternate location and cost to replace the industrial wastewater facility would also need to be determined.

The Eastern Growth Area also included areas of wetlands habitat, incuding alkali sinks, with known locations of federally-endangered species (*cordalynthus palmatus)* and potential for more of these and other sensitive species in the area.

The City therefore concluded that although eastern growth may have some future potential for development, given the number of constraints and uncertainties, it was not considered the preferred project for this General Plan update.

Southern Growth: The City also considered growth to the south through many Planning Commission and City Council workshops. Southern growth was viewed as the most desirable because it would facilitate a compact and contiguous land use pattern and would logically continue the development patterns and provision of infrastructure set out by the City's previous planning efforts. The primary disadvantage to development in this area is the predominantly Class I and II prime soils in the area. To analyze potential impacts to agriculture from growth to the south, the City chose two variations in the Draft EIR for growth to the south; these two alternatives would accommodate the same population in slightly different configurations. For purposes of this *FEIR*, the City selected a minor variation of Alternative 2 as its preferred alternative.

10.4 EVALUATION OF ALTERNATIVES

This *EIR* examines five alternatives. It includes two "No Project" alternatives. The first is the No Project-No Development Alternative, which looks at the environmental impacts of no further development in Woodland. The second is the No Project - 1988 General Plan Alternative, which assumes continued reliance on the existing *General Plan*, adopted in 1988, including its land use and circulation plans, and all goals, policies, and implementation programs.

The *Draft EIR* included two southern growth alternatives that are very similar. These alternatives provide for growth to the south of the existing Urban Limit Line, as well as some expansion to the northeast. For purposes of this FEIR, the City selected a minor variation of Alternative 2 as its preferred alternative. The fifth alternative, "Eastern Growth Alternative," looks at directing growth to the east rather than to the south of the existing Urban Limit Line.

The boundaries of these alternatives, with the exception of the "No Project - No Development" alternative are shown in Figures 10-1 through 10-3. Each of these alternatives is described in the following paragraphs, and the impacts of these alternatives are compared in Table 10-1.

NO PROJECT - NO DEVELOPMENT ALTERNATIVE

The No Project - No Development Alternative assumes that no new development would be allowed beyond what currently exists. No further annexations to the city would take place, and population would remain at its current level of approximately 43,500. Selection of this alternative would essentially require that the City enact a moratorium on all new development, including projects that have already been approved. This would result in no new population or employment in the city. Also, note that throughout this *EIR*, the preferred alternative (variation of Alternative 2 is compared with existing conditions.

The No Project - No Development Alternative would make no changes to the existing development pattern, and would therefore not result in any environmental impacts, although growth in the region would be expected to increase traffic on state highways with associated air quality impacts. Because of its relatively few impacts, this alternative would be the environmentally superior alternative. This alternative, however, would not allow the City to provide for any housing or employment development or redevelopment; and it would be inconsistent with City policies for economic development, and would prevent the City from providing adequate opportunities for meeting its regional fair share housing responsibilities.

NO PROJECT - 1988 GENERAL PLAN ALTERNATIVE

The No Project - 1988 General Plan Alternative would mean continued reliance on the existing *Woodland General Plan* adopted in 1988, since this plan would continue to govern land use in Woodland if the updated *General Plan* is not adopted. A summary of the differences between the preferred alternative (*General Plan)* and the *1988 General Plan* is included in Chapter 3 of this *EIR*. The Urban Limit Line for the *1988 General Plan* encompasses approximately 6,460 acres, with a population holding capacity of 60,400 with a time frame of the year 2010.

The impacts of the *1988 General Plan* were analyzed in an EIR prepared for the plan in 1988. These impacts are essentially the same as described in Table 10-1. Since 1988, however, some additional information has become available that affects the conclusions of the 1988 EIR. First, the U. S. Army Corps of Engineers published a *Westside Tributaries Study* in March 1994 indicating that flooding potential from Cache Creek was greater than previously shown on Flood Insurance Rate Maps for the area, and indicating flooding potential in the north part of Woodland designated for residential development in the *1988 General Plan*. Secondly, although the EIR on the *1988 General Plan* concludes that the Plan will have a significant impact on biological resources, subsequent habitat mapping and investigation in connection with the Countywide *Habitat Management Plan* efforts indicate that more species may be threatened than indicated in the 1988 EIR.

The *1988 General Plan* generally provides for less development than the preferred alternative, and as would be expected, would have fewer associated impacts. It would be environmentally superior to the preferred alternative, but to a lesser extent than the No Project - No Development Alternative.

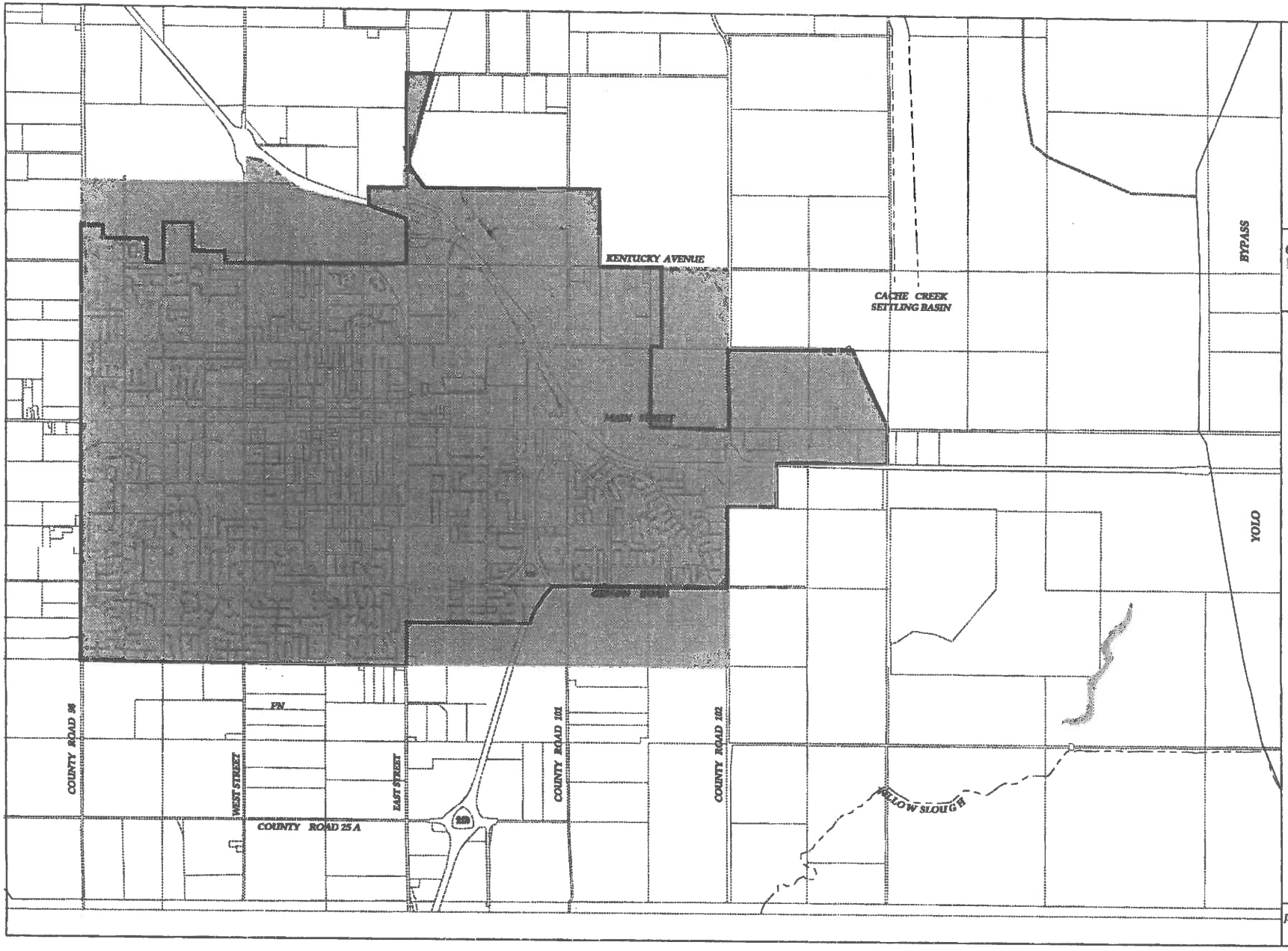
This alternative would, however, allow for residential development within flooding areas, exposing more people to risks associated with potential flooding. In addition, this alternative would not meet the longer term growth projections of the city, and the City would continue to be faced with piecemeal general plan amendment requests rather than considering and mitigating the effects of growth in a comprehensive basis.

DRAFT GENERAL PLAN - ALTERNATIVES 1 AND 2

The *Draft EIR* examined two alternatives that differed only in the configuration of planned residential development on the south. Alternative 1 encompasses 9,300 acres of land within its Urban Limit Line, while Alternative 2 covers slightly more, 9,400 acres, within its Urban Limit Line. Both alternatives would accommodate a population of 64,700 by the year 2020. In only a few areas do the impacts of these two alternatives differ. For the purposes of this *FEIR*, the preferred alternative is a minor variation of Draft General Plan Alternative 2, adding 120 acres of land to this alternative. The impacts of the two Draft General Plan alternatives are summarized in Table 10-1, and the impacts of the preferred alternative (variation of Alternative 2) is analyzed throughout the main body of this *EIR*.

EASTERN GROWTH ALTERNATIVE

Under the Eastern Growth Alternative, the area designated for Urban Reserve on the Land Use Diagram would be designated for future urban development. No development south of the existing Urban Limit Line would be permitted under this alternative. The holding capacity and projected growth would be the same under this alternative as the preferred alternative, but it encompasses a larger land area as it includes the City's wastewater treatment plant site and also includes additional territory to allow for buffering needs around the wastewater treatment plant, based on General Plan policies regarding buffering between residential and industrial uses.



CITY OF WOODLAND GENERAL PLAN

Draft Environmental Impact Report

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FIGURE 10-1

NO PROJECT/ EXISTING GENERAL PLAN ALTERNATIVE

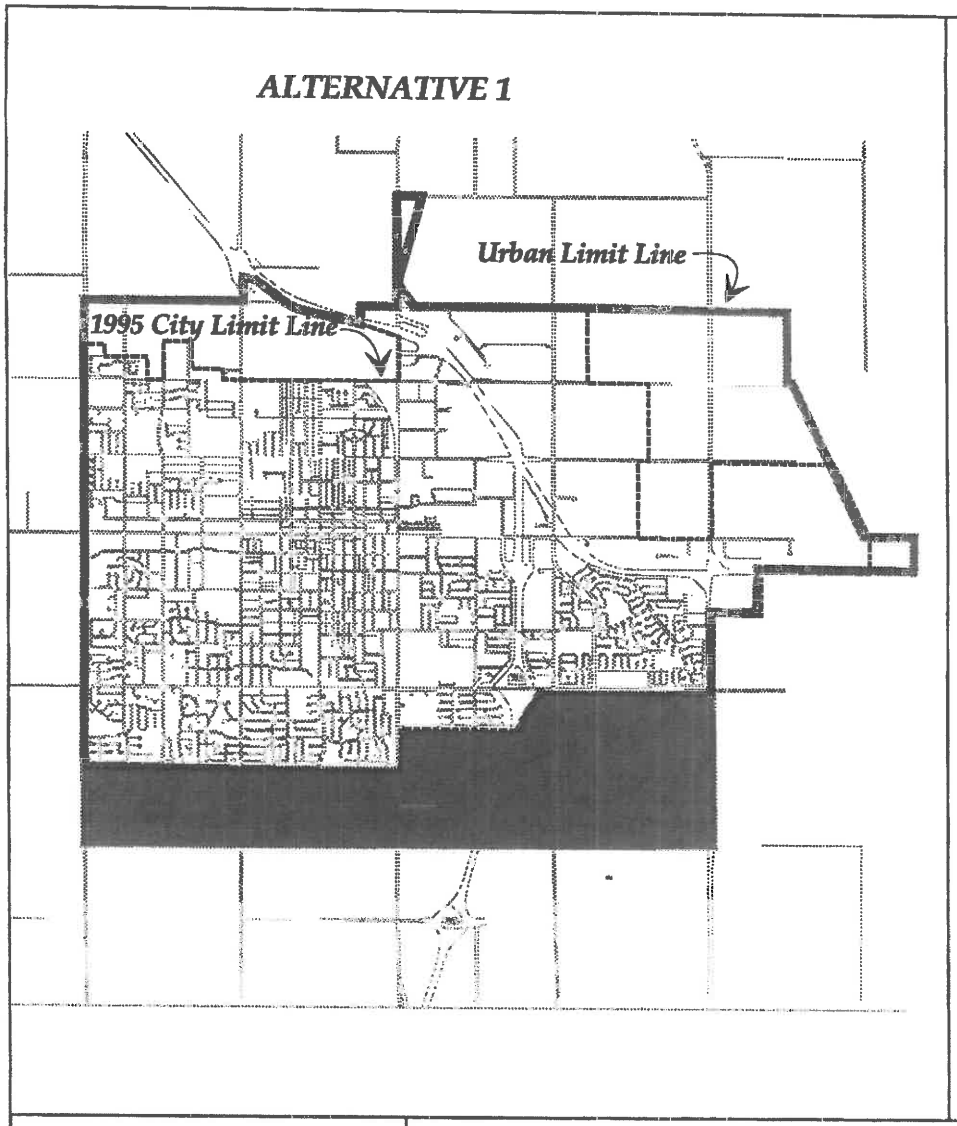
1988 General Plan Urban Limit Line

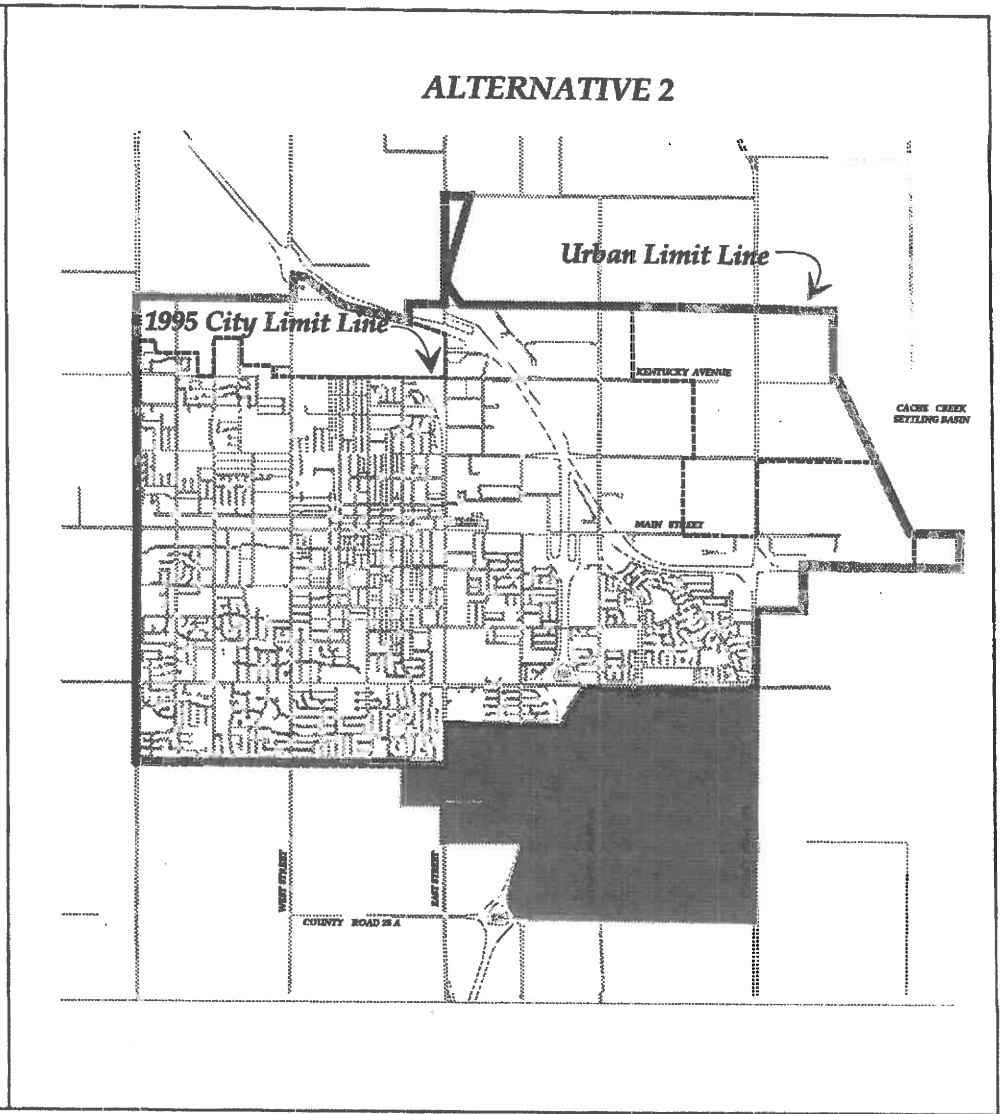
1995 City Limits

City of Woodland

J. Laurence Mintier & Associates

September 1995





CITY OF WOODLAND GENERAL PLAN
Draft EIR

City of Woodland

FIGURE 10-2

DRAFT GENERAL PLAN ALTERNATIVES 1 AND 2

Note: Alternatives 1 and 2 differ only in the configuration of planned residential development on the south.

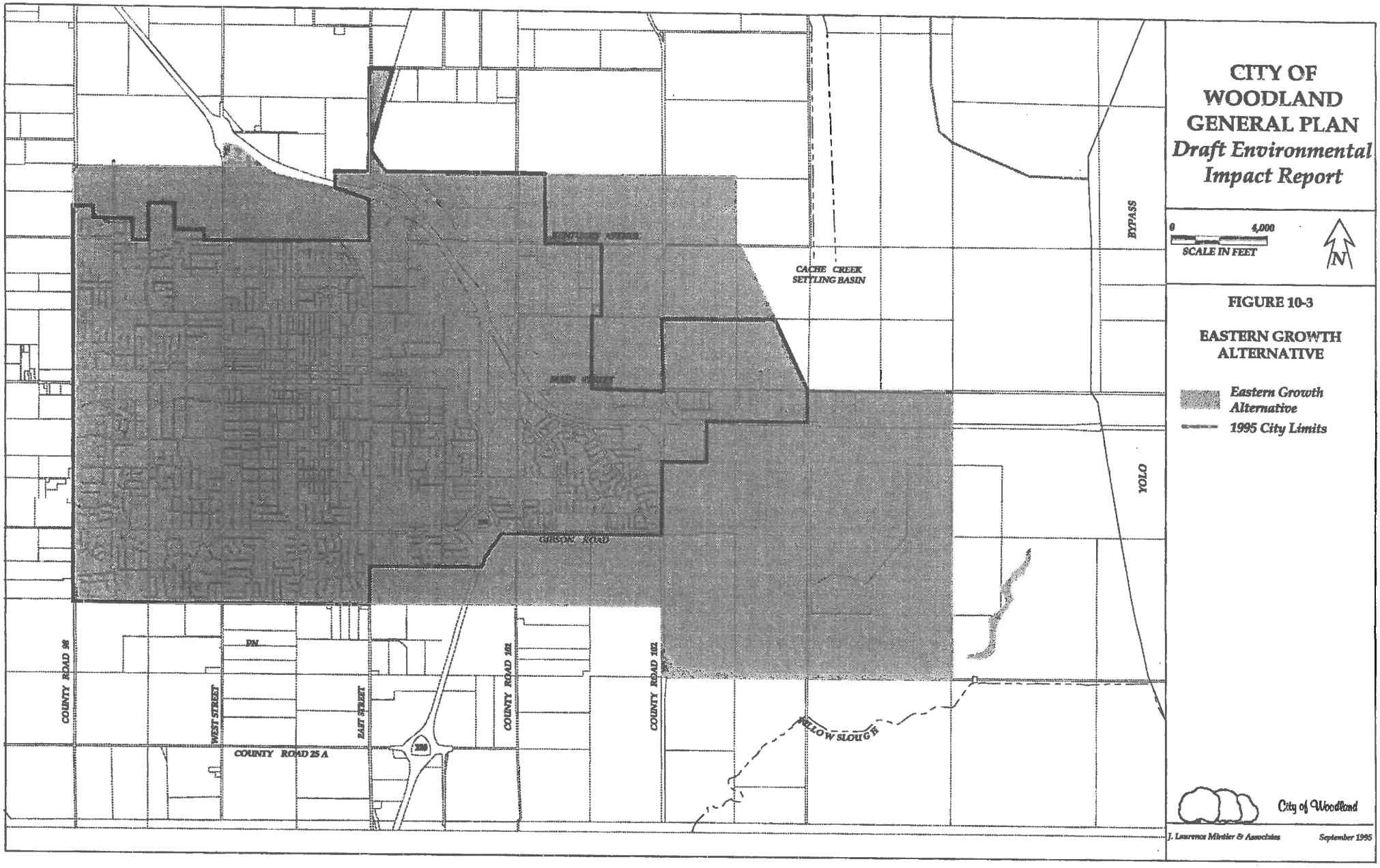

CITY OF WOODLAND GENERAL PLAN
Draft Environmental Impact Report
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FIGURE 10-3
EASTERN GROWTH ALTERNATIVE
Eastern Growth Alternative
1995 City Limits
CACHE CREEK SETTLING BASIN
BYPASS
YOLO
GIBSON ROAD
COUNTY ROAD 98
WEST STREET
EAST STREET
COUNTY ROAD 25 A
COUNTY ROAD 101
COUNTY ROAD 102
YELLOW SLOUGH
City of Woodland
J. Laurence Mintier & Associates
September 1995

This alternative is primarily considered a variation on the *General Plan's* Land Use Diagram; it is assumed that the policies and programs included in the *Policy Document* would apply under this alternative, except in cases where this land use arrangement would make any policies and programs infeasible.

TABLE 10-1

COMPARATIVE IMPACTS OF ALTERNATIVES (Continued)

Impact Category	No Project Alternatives		Southern Growth Alternatives		Eastern Growth Alternative
	No Project - No Development Alternative	No Project - 1988 General Plan Alternative	Draft General Plan - Alternative 1	Draft General Plan - Alternative 2	
Agricultural Land	Would result in no further loss of agricultural lands.	Development within the Urban Limit Line of the *1988 General Plan* would result in the development of approximately 150 acres of agricultural land within the city limits, and another 280 acres of prime soil north of Kentucky Avenue and approximately 296 acres one-half mile south of Gibson Road between Yuba College and East Street. This is considered a **significant** impact. No mitigation measures are available to reduce this impact to a less-than-significant level.	All impacts under the No Project - 1988 General Plan would also occur under alternative. In total, approximately 2,296 acres of prime agricultural land is designated for urban development; some of the prime agricultural land in the northern industrial area would probably not be converted to urban development by the 2020. Another 500 acres of nonprime agricultural land is also designated for urban development; only two-thirds of this would be expected to develop by 2020. The loss of prime agricultural land is considered a **significant** impact.	All impacts under the No Project - 1988 General Plan would also occur under this Alternative. In total, approximately 2,108 acres of prime agricultural land is designated for urban development; some of the prime agricultural land in the northern industrial area would probably not be converted to urban development by the 2020. Another 500 acres of nonprime agricultural land is also designated for urban development; only two-thirds of this would be expected to develop by 2020. The loss of prime agricultural land is considered a **significant** impact	All impacts under the No Project - 1988 General Plan would also occur under this Alternative, since this alternative encompasses all land within the existing Urban Limit Line. An additional 550 acres of non-prime agricultural land would be converted under this alternative. Most of the land east of County Road 102 is non-prime agricultural land (Class 3 and 4) and the conversion of this land would be considered less-than-significant. The extension of new roadways to connect eastern growth with the rest of the city to the west might run through agricultural lands. Development under this alternative would therefore have **significant** impact on agricultural resources, but all of this would be attributable to loss of prime agricultural lands within the existing Urban Limit Line.
Urban/Agricultural Conflicts	Would create no additional conflicts.	Would extend development to the south and north, but would not provide a net increase in urban/agricultural interface; the impact would therefore be considered less-than-significant.	Under Alternative 1, agricultural operations and designated urban development could directly abut in the same manner that currently exists at the southernmost edge of the existing city limits. Requirements for specific plans, requires that buffering needs be examined and promote the development of lower density residential development in these areas to minimize conflict. This is therefore considered a less-than-significant impact.	The land use pattern of Alternative 2 would create an agricultural area south of the Urban Limit Line and north of County Road 25A between East Street and SR 113 that would be difficult to farm, since it would be essentially surrounded on two sides by urban development and by a third side by a major roadway. This area would be under pressure to convert to urban development, particularly given its location by an interchange. This is considered a **significant** impact.	Would essentially have the same impacts as the No Project - 1988 General Plan Alternative. Additional urban/ agricultural edges would be created to the east. The location of development adjacent to rice fields to the east would probably make it very difficult to continue adjacent rice farming because of the nature of the crop operations, including pests, rice burning, and herbicide applications. Given the General Plan's requirement for buffering, however, this impact on adjacent agricultural operations would be considered **less-than-significant.**

TABLE 10-1

COMPARATIVE IMPACTS OF ALTERNATIVES (Continued)

Impact Category	No Project Alternatives		Southern Growth Alternatives		Eastern Growth Alternative
	No Project - No Development Alternative	No Project - 1988 General Plan Alternative	Draft General Plan - Alternative 1	Draft General Plan - Alternative 2	
Williamson Act Lands	Would have no impact on lands under Williamson Act contract.	All Williamson Act lands within the existing Urban Limit Line have filed for nonrenewal. The impact of development on these lands is therefore considered less-than-significant.	Under Alternative 1, 275 acres of Williamson Act land that have filed for nonrenewal have are designated for development, and 30 acres of land currently in Williamson Act. Since most of these lands have filed for nonrenewal, and given the location of the small parcel under contract at the southernmost edge of this alternative, the impacts on Williamson Act lands are considered less-than-significant.	Under Alternative 2, 355 acres of Williamson Act land that have filed for nonrenewal have are designated for development, and 160 acres that are currently in Williamson Act and have not applied for nonrenewal is located at the southeasternmost part of the area. This would logically be the last area to develop, so assuming it nonrenews before the year 2000, this would probably not create any problems for the sequence of development. The City cannot guarantee that the property owner would choose not to renew the contract on this land, and the only other way to permit development would be through cancellation. The potential for cancellation of this Williamson Act contract is considered a **significant** impact that cannot be mitigated to a less-than-significant level.	Although much of east of the wastewater treatment plant is under Williamson Act land that will expire by the year 2000. The land currently used for the industrial wastewater facility would probably revert to its Williamson Act status if it was removed from public use. Since the industrial wastewater facility is currently not in agricultural use, however, this is considered a less-than-significant impact.
Housing and Population	Would not allow for any additional housing or population growth, and would therefore be inconsistent with the region's projected population growth, which would require this growth to be accommodated elsewhere in the region. This is considered a **significant** impact. Furthermore, this alternative would not provide the opportunity for the City to meet its fair share of regional housing needs, and would therefore be inconsistent with the adopted *Housing Element*. This would also be considered a **significant** impact. No mitigation measures are available to reduce this impact to a less-than-significant level.	The *1988 General Plan* has a holding capacity of 60,400 for a time frame of 2010. While the *General Plan* includes a time frame of 2020, 2010 would still be considered a long-term time frame and would not be considered a constraint to housing and population growth. The *1988 General Plan* is consistent with the *Housing Element*. The impact is therefore considered less-than-significant.	Both alternatives provide land to accommodate projected housing demand by the 2020 in a range of residential densities and are consistent with the adopted *Housing Element*. They both also provide for a jobs-housing balance in 2020. The housing-related impacts are therefore considered less-than-significant.		Would provide land to accommodate projected housing demand by the 2020 in a range of residential densities. This alternative is consistent with the adopted *Housing Element* and provides for a jobs-housing balance in 2020. The housing related impacts of this alternative are therefore considered less-than-significant.

TABLE 10-1

COMPARATIVE IMPACTS OF ALTERNATIVES (Continued)

Impact Category	No Project Alternatives		Southern Growth Alternatives		Eastern Growth Alternative
	No Project - No Development Alternative	No Project - 1988 General Plan Alternative	Draft General Plan - Alternative 1	Draft General Plan - Alternative 2	
Transportation and Circulation					
Streets and Roads	Would not place any additional demands on the transportation system serving the city and would therefore have no impact.	Development under this alternative would increase traffic and would require roadway improvements. The *1988 General Plan* includes a Circulation Plan Diagram, implemented by the *Master Street Plan,* that establish the improvements needed to serve growth under this alternative. This impact is therefore considered less-than-significant.	Development under Draft General Plan Alternative 1 will result in two segments of Main Street exceeding the General Plan's service level threshold of LOS D. Mitigation measures to address this service level would include widening Main Street Downtown. This would remove existing buildings and would not be appropriate for the character of Downtown and was therefore considered infeasible. The *Downtown Specific Plan* recommended exploring one-way couplets for the Downtown area along Main Street and Court Street. Because of the effects on existing uses and very site-specific impacts of implementing this mitigation measure, it was not determined to be feasible without further investigation. This therefore remains a ***potentially significant*** impact. The second section of Main Street projected to operate at level of service E is between Industrial Way and the I-5 southbound ramp. Possible improvements that would mitigate this impact could include widening Main Street to six lanes or construction of an improved connection between I-5 and SR 113. This area is currently the subject of a *Project Study Report* being prepared by the City. Since the City cannot unilaterally guarantee such an improvement to the state highway system, this is still considered a ***potentially significant*** impact.	Development under this alternative would increase traffic and would have the same impacts as Alternative 1. The other potentially significant impact of Alternative 2 is the segment of Gibson Road between Third Street and East Street, which just exceeds the level of service C threshold. This impact could be mitigated by widening this roadway, but since the Project Study Report for the I-5/SR 113 connector will result in a redistribution of trips in this area, it does not appear reasonable to widen it without further evaluation. A new roadway connecting the area southeast of East Street to College or Third Street would also mitigate this impact. The increased traffic on College or Third could be out of character with the residential area. A more appropriate mitigation would be the addition of policy to the General Plan requiring the Project Study Report to contain an evaluation of this location as part of the traffic analysis, and to recommend any needed improvements identified as a result of this analysis. Without knowing the outcome of such a study, however, the impact on Gibson Road is still considered a **potentially significant** impact.	Development under the Eastern Growth Alternative would require the development of new roadways. A new interchange along I-5 would probably be required, which would be more costly than the transportation improvements expected under the other alternatives. This improvement could possibly occur in connection with the I-5/SR 113 connector and is one of the alternatives being considered as part of the I-5/SR 113 study. Connections to the rest of Woodland on the west would be difficult because of the location of the wastewater treatment plant. It would require either an extension of Gibson Road through the middle of the treatment plant site, or development of a new roadway on the southern edge of the treatment plant, which would then require access near known habitat for federally-endangered species (*cordylanthus palmatus)* and adjacent to the regional park site. Development of a roadway system to serve this area would be more costly and more problematic. Given the requirements for new development to pay for needed roadway improvements and address environmental impacts, however, this alternative is assumed to have a less-than-significant impact on the roadway system. Secondary environmental considerations of development of such a roadway system are discussed in other sections.

TABLE 10-1

COMPARATIVE IMPACTS OF ALTERNATIVES (Continued)

Impact Category	No Project Alternatives		Southern Growth Alternatives		Eastern Growth Alternative
	No Project - No Development Alternative	No Project - 1988 General Plan Alternative	Draft General Plan - Alternative 1	Draft General Plan - Alternative 2	
Public Transportation, Non-Motorized Transportation	Would have no effect on alternative transportation systems.	Compact nature of the city would support efficient use of transit and would promote bicycling and walking. The impact is therefore considered less-than-significant.	The relatively compact arrangement of these alternatives would support efficient use of transit and would promote bicycling and walking. The policies of the *General Plan* provide for encouragement of transit services and promote new development at densities and alignments to foster transit use. They also provide for and encourage non-motorized transportation and will result in no unmet demand for non-motorized transportation opportunities. The impact is therefore considered less-than-significant. Given the level of effort the *General Plan* proposes to devote to pedestrian and bicycle transportation, the effects could, indeed, be beneficial.		The dispersed nature of development would make public transit service to the area difficult. Development under this alternative would have to reach a threshold before extension of public transit to the area could be justified. Bicycling and walking opportunities would be less than under the General Plan alternatives. It is assumed that public transit would only be extended to this area when it became economically feasible, therefore this alternative would have a less-than-significant impact on alternative forms of transportation. The air quality implications of the lower levels of transit use and non-motorized transportation use are discussed separately in the "Air Quality" section.

TABLE 10-1

COMPARATIVE IMPACTS OF ALTERNATIVES (Continued)

Impact Category	No Project Alternatives		Southern Growth Alternatives		Eastern Growth Alternative
	No Project - No Development Alternative	No Project - 1988 General Plan Alternative	Draft General Plan - Alternative 1	Draft General Plan - Alternative 2	
Public Facilities and Services					
Water Supply and Delivery	Would not place any additional demands on the City's various public facilities and services and would therefore have no impact.	Impacts would be similar to those under Draft General Plan Alternatives 1 and 2, although to a lesser extent. Water demands in the area would not appreciably increase over current agricultural and urban uses. The impact on water supply would therefore be considered less-than-significant. The existing *Master Water Plan* would continue to govern the future water delivery system.	Would result in increased water demands as a result of converting agricultural lands to urban development. Future studies of the safe yield of the groundwater basin, along with investigation of other water supply options, is needed to determine the City's long-term water supply. With the use of aggressive water conservation measures, water use would be reduced, and policies of the plan reduce water use from new development so no net increase in groundwater would result, pending conclusions regarding the basin's safe yield.. These measures would reduce the impact to a less-than-significant impact. Would require extension of the existing system; this would be provided for in connection with new development, and is therefore considered a less-than-significant impact.		This alternative would have the same water requirements as the Draft General Plan alternatives, and assuming this development relied on groundwater, would have the same impacts. Owners of some of the property east of the wastewater treatment plant have surface water rights to the Sacramento River. It that has been suggested is that if development is permitted to the east, the City could use these surface water supplies. Since the Eastern Growth Alternative provides development potential to only some of these lands, however, the use of surface water under this alternative cannot be assumed. Therefore, this impact is considered less than signficant as under the Draft General Plan alternatives. Development of the water delivery system would be more difficult, however, because the high water table in the area. It is assumed, however, that the additional costs of ensuring the safety of the underground delivery system would be borne by the new development that would be served.

TABLE 10-1

COMPARATIVE IMPACTS OF ALTERNATIVES (Continued)

Impact Category	No Project Alternatives		Southern Growth Alternatives		Eastern Growth Alternative
	No Project - No Development Alternative	No Project - 1988 General Plan Alternative	Draft General Plan - Alternative 1	Draft General Plan - Alternative 2	
Wastewater Collection and Treatment	Would not place any additional demands on the City's various public facilities and services and would therefore have no impact.	Would require expansion of collection system and treatment facilities to serve new development. The existing *Wastewater Master Plan* lays out a system for serving new development. Given the inclusion of a General Plan policy requiring new development to provide for all facilities needed to serve it, the impact on the collection and treatment system is considered to be less-than-significant.	Would require expansion of collection system and treatment facilities to serve new development. The *General Plan* lays out a system for serving new development. Given the inclusion of a General Plan policy requiring new development to provide for all facilities needed to serve it, the impact on the collection and treatment system is considered to be less-than-significant.		This alternative would affect both the main wastewater treatment plant and the industrial wastewater facility. The industrial wastewater facility would need to be completely relocated, and a new facility would need to be constructed at a new, and presently unknown, location. Because of the City's investment in the main wastewater treatment plant, relocation of this facility is not considered economically feasible within the time frame of the *General Plan*. Development under this alternative would require buffers to avoid incompatible development between the residential and the industrial (wastewater treatment) uses. In addition, development of a roadway through the facility to serve growth to the east, while feasible, would also increase exposure and potential conflicts, and would require additional City security at the plant. These impacts on the wastewater treatment facilities are considered **significant,** but could be mitigated to a less-than-significant level through the use of buffers, operational changes, or avoidance of roadways through the plant.

TABLE 10-1

COMPARATIVE IMPACTS OF ALTERNATIVES (Continued)

Impact Category	No Project Alternatives		Southern Growth Alternatives		Eastern Growth Alternative
	No Project - No Development Alternative	No Project - 1988 General Plan Alternative	Draft General Plan - Alternative 1	Draft General Plan - Alternative 2	
Storm Drainage	Would not place any additional demands on the City's various public facilities and services and would therefore have no impact.	Would require expansion of storm drainage system to serve new development. The existing *Storm Drainage Master Plan* lays out a system for serving new development. Given the inclusion of a General Plan policy requiring new development to provide for all facilities needed to serve it, the impact on the storm drainage system is considered to be less-than-significant.	Development according to both Draft General Plan Alternatives *would* increase stormwater runoff from urban development covering pervious surfaces such as dirt or fields with impervious surfaces such as roofs and pavement. The most substantial increases in runoff will occur in areas that are currently in agricultural production. This *DEIR* describes drainage improvements needed to serve projected development under both *Draft General Plan Alternatives*. Policies and programs *of the General Plan* provide for the detailed storm drainage planning and expansion, development, and financing of new storm drainage facilities. The impact of Draft General Plan Alternatives 1 and 2 on drainage in Woodland would therefore, be less-than-significant.		Development under this alternative would result in increased runoff peaks and volumes. Because the Woodland area generally slopes from west to east, only the area located west of Road 103 would likely drain to the existing system. The area under this alternative located west of Road 103 would likely require a system to convey runoff from west to east to a new pumping station. The new station could discharge into the City's outfall channel or possibly into the Yolo Bypass. Policies and programs *of the General Plan* provide for the detailed storm drainage planning and expansion, development, and financing of new storm drainage facilities. The impact of this alternative on drainage in Woodland would therefore, be less-than-significant.
Law Enforcement	Would not place any additional demands on the City's various public facilities and services and would therefore have no impact.	Would create the demand for additional law enforcement, consistent with the standards of the *Level of Service Plan*. With requirements for new development to address these services, the impacts would be considered less-than-significant.	Would create the demand for additional law enforcement services. *The General Plan Policy Document* contains policies aimed at reducing demand for police services and endorses staffing goals and minimum response times to ensure these goals. The impacts on police equipment and operations are required to be addressed in connection with specific plans for new residential development outside the existing city limits. The impact of the Draft General Plan Alternatives on police services would, therefore, be less-than-significant.		The impacts on personnel and equipment would be the same as Draft General Plan Alternatives 1 and 2. Because of the location of development under this alternative, it would be more difficult to ensure adequate response times.
Fire Protection	Would not place any additional demands on the City's various public facilities and services and would therefore have no impact.	Would create the demand for additional fire protection services, consistent with the standards of the *Level of Service Plan*. With requirements for new development to address these services, the impacts would be considered less-than-significant.	Would create the demand for additional fire protection services. Additional personnel and volunteers will also be required. The development of new fire stations in the north area and south area would probably be required to ensure adequate response times. *The General Plan Policy Document* contains policies aimed at reducing fire hazards and endorses fire safety standards and minimum response times. The impacts on fire protection equipment and operations are required to be addressed in connection with specific plans for new residential development outside the existing city limits. The impact of the Draft General Plan Alternatives on fire protection services would, therefore, be less-than-significant.		Impacts on personnel and equipment would be the same as Draft General Plan Alternatives 1 and 2. New fire stations would be required on the north and in the east.

TABLE 10-1

COMPARATIVE IMPACTS OF ALTERNATIVES (Continued)

Impact Category	No Project Alternatives		Southern Growth Alternatives		Eastern Growth Alternative
	No Project - No Development Alternative	No Project - 1988 General Plan Alternative	Draft General Plan - Alternative 1	Draft General Plan - Alternative 2	
Solid Waste Collection and Disposal	Would result in no increases in solid waste collection and disposal.	Would have similar impacts on solid waste and disposal as under Draft General Plan Alternatives 1 and 2, but would generate approximately 30 percent lower waste volumes.	If the City increases its waste diversion from 20 percent in 1990 to 50 percent by the year 2000 as required by the SRRE, the current 67,000 tons of waste disposed of annually would be reduced to about 40,000 tons of year. The additional waste in 2020 would be reduced from 40,500 to 24,000 tons per year. The total of 64,000 tons per year in 2020 would be less than the current disposal rates. The Yolo County Landfill has adequate capacity for Woodland's projected quantities of wastes. Growth under both Draft General Plan Alternatives is consistent with the County's growth projections in projecting the life of the landfill. Therefore, the solid waste impacts of Draft General Plan Alternatives 1 and 2 would be less-than-significant		Because this alternative has the same holding capacity as the Draft General Plan Alternatives, the impacts would be the same.
Recreational, Educational and Community Services					
Parks and Recreation	Would not place any additional demands on the City's various recreational, educational, and community services and would therefore have no impact.	New development under this alternative would create the need for additional parks and recreational facilities. These would be developed according to the *Level of Service Plan's* standards in connection with new development. This is considered a less-than-significant impact.	New development under both alternatives would create the demand for an additional 49 acres of neighborhood parks, 96 acres of sports fields, and 24 acres toward the community park. In addition, new development would be required to contribute to the development of a new community center, youth center, and senior center. *The General Plan* also contemplates development of a new cemetery and golf course. Policies *of the General Plan* require development to finance needed park facilities, and to determine a mechanism for their maintenance. The impact of the Draft General Plan Alternatives on parks and recreation facilities are therefore considered less-than-significant.		Impacts would be the same as under Draft General Plan Alternatives 1 and 2; only the locations of the parks would differ.
Schools		New development would require the development of additional schools to serve new residential development, the impact on new schools would be the similar to those of the Draft General Plan Alternatives, with about 15 percent fewer students, and would be considered a **potentially significant** impact. There are no additional mitigation measures that would reduce this impact to a less-than-significant level.	Both alternatives would require development of four to five new elementary schools and a new junior high and high school. Funding for new schools has become a complicated matter, with scarce state funding, and questions about the legality and fairness of various local funding options. Policies of the plan seek to promote high quality education facilities in Woodland and assist the Woodland Joint Unified School District in planning for and funding the development of needed new school facilities. Given the uncertainty regarding the availability of future state funding and the ability to pass local voter-approved school bonds, however, the impact on new schools is considered a **potentially significant** impact. There are no additional mitigation measures that would reduce this impact to a less-than-significant level.		Impacts would be the same as under Draft General Plan Alternatives 1 and 2, and would be considered **potentially significant.**
Child Care	Would create no additional demand for child care services.	Would require additional child care services. The *1988 General Plan* does not include policies for child care; however, de facto City policy and input from the Child Care Committee should promote concern for child care services with new development. The impact is therefore considered less-than-significant.	Both alternatives would require child care services for nearly 2,500 additional children by 2020. This number will be higher if the proportion of two-parent working families or single parents continues to increase. The City is not a major provider of child care services; most of the demand will be met though private and school district programs. *The General Plan* encourages the development of child care facilities and services, and requires planning for them in connection with new residential development. The impact of the Draft General Plan Alternatives on child care services in Woodland are therefore, considered less-than-significant.		Impacts would be the same as under Draft General Plan Alternatives 1 and 2.

TABLE 10-1

COMPARATIVE IMPACTS OF ALTERNATIVES (Continued)

Impact Category	No Project Alternatives		Southern Growth Alternatives		Eastern Growth Alternative
	No Project - No Development Alternative	No Project - 1988 General Plan Alternative	Draft General Plan - Alternative 1	Draft General Plan - Alternative 2	
Libraries	Would place no additional requirements on library services.	Would require the development of additional library facilities to serve new residential development. The Plan includes a library standard to be applied to new development; the impact is therefore considered less-than-significant.	Both alternatives would create demand for an additional 12,300 square feet of library space and 60,705 volumes, along with additional staffing and other support materials. Presumably, this would be accommodated in one or two library branches, as well as improvements at the central facility Downtown. *The General Plan* supports the development of additional library materials and supplies; therefore, the impact of the Draft General Plan Alternatives on library services are considered less-than-significant.		Impacts would be the same as under Draft General Plan Alternatives 1 and 2; only the locations of branch libraries would differ.
Historic and Archaeological Resources					
	Would not result in any changes to or displacements of the city's historic and archaeological resources and would therefore have no impact.	This alternative could result in the demolition or alteration of locally important historic buildings. The Plan includes policies and programs to provide for the protection of these resources, however, so it is considered a less-than-significant impact.	Development and redevelopment in the city could result in the demolition or alteration of historically-significant buildings. *The General Plan* includes an extensive set of policies and programs to preserve historic and architecturally significant sites from development and redevelopment, and to ensure that surrounding development is compatible with the surrounding buildings in historic districts. The impacts of the Draft General Plan Alternatives on historic resources, are therefore less-than-significant. While it is possible that there are archaeological resources in the Planning Area, the *General Plan* includes policies to protect archaeological resources from new development. The impacts of the Draft General Plan Alternatives are therefore, less-than-significant.		Impacts would be essentially the same as under Draft General Plan Alternatives 1 and 2.
Environmental Resources					
Water Resources	Would not result in any changes to or displacements of the City's environmental resources and would therefore have no impact.	Would increase urban runoff to surface and groundwater. Compliance with federal and state water quality regulations would reduce this impact to a less-than-significant level.	Both Alternatives would increase urban runoff to surface and groundwater. Policies and programs *of the General Plan*, however, provide for the use of Best Management Practices and development of a storm drainage ordinance to address the quality of runoff form the storm drainage system in Woodland. In addition, compliance with state and federal regulations will help minimize impacts. This is therefore considered a less-than-significant impact.		Impacts would be essentially the same as under Draft General Plan Alternatives 1 and 2, although the higher water table would increase the potential for percolation and contamination of groundwater resources. With the use of Best Management Practices and development of a storm drainage ordinance to address the quality of runoff form the storm drainage system in Woodland, in addition to compliance with state and federal regulations, the impact would be considered less-than-significant.
Mineral Resources	Would not result in any changes to or displacements of the City's environmental resources and would therefore have no impact.	There are no significant deposits of minerals within the existing Urban Limit Line; therefore this alternative would have no impact on mineral resources.	There are no significant deposits of minerals within the boundaries of this alternative; therefore it would have no impact on mineral resources.	There are no significant deposits of minerals within the boundaries of this alternative; therefore it would have no impact on mineral resources.	There are no significant deposits of minerals within the boundaries of this alternative; therefore it would have no impact on mineral resources.

TABLE 10-1

COMPARATIVE IMPACTS OF ALTERNATIVES (Continued)

Impact Category	No Project Alternatives		Southern Growth Alternatives		Eastern Growth Alternative
	No Project - No Development Alternative	No Project - 1988 General Plan Alternative	Draft General Plan - Alternative 1	Draft General Plan - Alternative 2	
Vegetation and Wildlife Resources	See "Water Resources" section.	Would result in the conversion of Alfalfa Pasture, Annual Field Crop, and Alkali Sink habitat types, with potentially adverse affects on Swainson's Hawk, several threatened and endangered plant species. This would be a **potentially significant** impact. This impact would be reduced to a less-than-significant level through participation and adoption of a countywide habitat management plan. Since this plan has not yet been completed, it cannot be guaranteed that mitigation to a less-than-significant impact would occur.	Would result in the impacts reported for the No Project - 1988 General Plan Alternative. In addition, development on the south would result in the conversion of agricultural habitats, wetlands habitat (alkaline sinks, vernal pools,) and wooded savannahs. The wetlands habitat are home to several species of concern. The impact on vegetation and wildlife resources is considered **significant**. The impacts could be mitigated through a combination of the *General Plan* policies and adoption of the Countywide *Habitat Conservation Plan*. Since the City cannot guarantee adoption of this plan; the cumulative impact of habitat loss is still considered potentially significant.	Would result in the impacts reported under the No Project - 1988 General Plan Alternative. In addition, development on the south would result in the conversion of agricultural habitats, wetlands habitat (alkaline sinks, vernal pools,) wooded savannahs, and scattered oaks in agriculture. The wetlands habitat are home to several species of concern. The impact on vegetation and wildlife resources is considered **significant**. The impacts could be mitigated through a combination of the *General Plan* policies and adoption of the Countywide *Habitat Conservation Plan*. Since the City cannot guarantee adoption of this plan; the cumulative impact of habitat loss is still considered potentially significant.	Would result in the impacts reported under the No Project - 1988 General Plan Alternative, plus additional agricultural and wetlands habitat to the east. The Eastern Growth Alternative would result in the greatest loss of wetlands areas, including alkali sinks and vernal pool areas. The impact on vegetation and wildlife resources is considered **significant**. The impacts could be mitigated through a combination *of the General Plan* policies and adoption of the Countywide *Habitat Conservation Plan*. Since the City cannot guarantee adoption of this plan; the cumulative impact of habitat loss is still considered potentially significant.
Air Quality	See "Water Resources" section.	Growth in population and employment associated with development under this alternative would result in a substantial increase in regional air pollutants. This is considered a **significant** impact that cannot be mitigated to a less-than-significant level.	Growth in population and employment associated with development under the Draft General Plan Alternatives would result in a substantial increase in regional air pollutants. *The General Plan* policies comprise a comprehensive strategy for reducing the air quality impacts of development and transportation systems. Application of all *Draft General Plan* air quality policies would reduce the impact of future development in Woodland, but not to a level that would be insignificant. Project impacts on regional air quality would remain **significant** and unavoidable even after implementation of all *Draft General Plan* policies regarding air quality.		The Eastern Growth Alternative would have the greatest impact on regional air quality because of the land use pattern. The location of new development separated from the rest of the community would result in longer trips within Woodland, and would reduce the potential for bicycling and walking. The location along I-5 would also be a prime location for housing for commuters to Sacramento. The impacts on air quality are considered **significant** and unavoidable.

TABLE 10-1

COMPARATIVE IMPACTS OF ALTERNATIVES (Continued)

Impact Category	No Project Alternatives		Southern Growth Alternatives		Eastern Growth Alternative
	No Project - No Development Alternative	No Project - 1988 General Plan Alternative	Draft General Plan - Alternative 1	Draft General Plan - Alternative 2	
Health and Safety					
Seismic and Geologic Hazards	Presently, the most significant seismic and geologic hazards in Woodland are to older, unreinforced masonry structures and levees along canals, Cache Creek, and the Yolo Bypass which could collapse during strong ground shaking. Some areas within the No Development Alternative are within a flood zone or the Indian valley flood inundation zone. The No Development Alternative would not alleviate any existing risks, but would not create any additional hazards or expose additional people to hazards.	This alternative would present the same geologic and seismic hazards as the No Project - No Development Alternative with respect to hazards to existing development. For new development, compliance with the *Uniform Building Code* will provide reasonable assurance that hazards associates with earthquakes in the Woodland area will have a less-than-significant impact.	New structures built in accord with *The General Plan*, under either Alternative 1 or 2, could be subject to shaking or settlement caused by liquefaction, settlement, or lurch cracking. It is unlikely, however, that such shaking or settlement would be severe. Furthermore, all new buildings approved for development by the City would have to comply with the *Uniform Building Code*, so they would be have to constructed to withstand seismic effects. The most significant seismic and geologic hazards would be related to older, unreinforced masonry structures and structures built before modern building codes were in place. The impact of Alternatives 1 and 2 is therefore considered less-than-significant.		The implications of this alternative with respect to seismic and geologic hazards would be similar to the Draft General Plan Alternatives. The soils in the eastern area, however, have more expansive qualities and would require additional engineering for foundations for buildings. In addition, high water table in the eastern area would create difficulties with lying infrastructure pipes. The costs would be higher to address these geologic conditions; however, new development would be responsible for paying for these facilities; therefore, the impact with respect to seismic and geologic hazards is considered less-than-significant.
Fire Hazards	While existing development faces some risks from fire hazards from urban and wildland fires, continued fire hazard abatement and fire protection services will keep this risk to a minimal level.	This alternative would present the same fire hazard risks as the No Project - No Development Alternative with respect to hazards to existing development. Growth and development under the *1988 General Plan* will increase the number of structures and persons that will be subject to potential fires. However, all new development would be required to meet construction standards for fire safety and provide its fair share contribution to funding fire protection facilities. Therefore, this is considered a less-than-significant impact.	New development under both Alternatives would increase the number of structures and persons that will be subject to potential fires simply by increasing the size of the building stock and the number of residents and workers in Woodland. New development would also infill most of the vacant parcels that currently represent potential locations for weed growth and fire hazards, and will only modestly increase the urban-open space interface. The cultivated agricultural lands around Woodland represent a low fire hazard. The policies *of the General Plan*, existing code provisions, and ongoing fire prevention efforts would minimize fire hazard risks. The impacts related to fire hazards from development under Draft General Plan Alternatives 1 and 2 are therefore, considered less-than-significant.		Impacts would be essentially the same as under Draft General Plan Alternatives 1 and 2.

TABLE 10-1

COMPARATIVE IMPACTS OF ALTERNATIVES (Continued)

Impact Category	No Project Alternatives		Southern Growth Alternatives		Eastern Growth Alternative
	No Project - No Development Alternative	No Project - 1988 General Plan Alternative	Draft General Plan - Alternative 1	Draft General Plan - Alternative 2	
Flood Hazards	The U.S. Army Corps of Engineers *Westside Tributaries Study* indicates that the 50, 100, and 500-year flood events from Cache Creek would result in more extensive flooding of north and east Woodland than are predicted by FEMA's Flood Insurance Rate Maps. This includes most of the area north of Beamer Street. While this new information indicates that existing development is subject to flood hazards, this alternative does not take any actions to cause or increase flood hazards and the impact is therefore considered less-than-significant.	The flood hazards for existing development would be the same as under the No Project - No Development Alternative. The *1988 General Plan* designates land north of Kentucky within the Cache Creek flood area for residential uses. Development in this area would expose people and structures to flooding hazards, which is considered a **significant** impact. It is assumed that the costs of addressing these flood risks would be more than could be supported by new residential development and could therefore not be reduced to a less-than-significant level.	The flood hazards for existing development would be the same as under the No Project - No Development Alternative. Alternatives 1 and 2 avoid designating new residential development within floodplain areas. Combined with the policies *of the General Plan*, this would ensure no development in areas subject to 100-year flooding without adequate mitigation or floodproofing of structures. The impact of Draft General Plan Alternatives 1 and 2 would therefore be less-than-significant.		Most of the Eastern Growth Alternative is located within the floodplain as designated by FEMA's Flood Insurance Rate Maps (all territory east of the treatment plant). The Sacramento Flood Control Agency also notes that this area would be subject to deep flooding in the event of a levee break. This would expose people and structures to flooding hazards from various sources, and is considered a **significant** impact. Although these impacts could be addressed through flood control improvement or through the construction of levees around these areas, the feasibility, costs, and environmental impacts of these improvements are unknown and cannot therefore be guaranteed.
Hazardous Materials	Would not increase the use or exposure of Woodland residents to hazardous materials.	The impacts would be essentially the same as under Draft General Plan Alternatives 1 and 2.	Would result in the increased possibility of exposure to hazardous materials. This exposure is expected to be greatest in areas where hazardous materials would be used in large quantities, such as the areas designated for industrial development in the northeast and northwest parts of the city. To a lesser extent, use of common household hazardous materials will continue in new residential and commercial areas. In addition, local highways and rail lines will continue to transport significant amounts of hazardous materials, thereby exposing nearby people and property to potentially hazardous conditions. Policies *of the General Plan*, along with ongoing administration of the City's *Emergency Response Plan*, the City's *Household Hazardous Waste Element*, and the *County Hazardous Waste Element* should minimize the hazardous materials impacts of development under Draft General Plan Alternatives 1 and 2. Therefore, this is considered a less-than-significant impact.		The impacts on hazardous wastes would be the same as under Draft General Plan Alternatives 1 and 2. The location of development around the wastewater treatment plant could expose people to potential releases from toxic chlorine gas from the wastewater treatment plant. This could be addressed through buffering around the plant or changes in operations at the plant. This impact is therefore considered less-than-significant.
Emergency Response	Would continue to rely on Emergency Response Plans.	The impacts would be essentially the same as under Draft General Plan Alternatives 1 and 2.	New development under Draft General Plan Alternatives 1 and 2 would increase the demand for emergency response services provide through local police and fire departments and emergency response organizations. Natural and man-made hazards associated with existing urban development would also continue to need such services. Generally, new development called for under Draft General Plan Alternatives 1 and 2 would create a development pattern that could be easily served by existing emergency service providers. Implementation of *Draft General Plan* policies, along with ongoing administration of the City's *Emergency Response Plan*, and compliance with all pertinent state and federal regulations, would provide for adequate emergency response services. This impact is therefore considered less-than-significant.		The impacts would be similar to those under Draft General Plan Alternatives 1 and 2, although the dispersed development pattern would be slightly more difficult to serve.

TABLE 10-1

COMPARATIVE IMPACTS OF ALTERNATIVES (Continued)

Impact Category	No Project Alternatives		Southern Growth Alternatives		Eastern Growth Alternative
	No Project - No Development Alternative	No Project - 1988 General Plan Alternative	Draft General Plan - Alternative 1	Draft General Plan - Alternative 2	
Noise	Would not result in any increased noise levels.	Would result in increased traffic noise levels. The *1988 General Plan* includes policies and programs to effectively reduce noise impacts related to new development to a less-than-significant level.	Development under both Draft General Plan Alternatives would result in increased traffic noise levels. *The General Plan* includes policies and programs to effectively reduce noise impacts related to new development to a less-than-significant level.		The impacts under this alternative would be similar to those under the No Project - 1988 General Plan Alternative. Unacceptable noise levels from air traffic from the Sacramento Metro Airport might potentially affect future development on the east side of the Eastern Growth Alternative. New development could be soundproofed; this would therefore be considered less-than-significant.
Growth Inducing Effects					
Growth Inducement	Would not allow any additional development and would therefore not be growth inducing	Designates land for additional development through 2010 for a population of 60,400. The plan also designates "study areas' to the south of the city that require a needs assessment to identify if development is needed in that area. The plan is growth-inducing, but to a lesser extent than the other alternatives except the No Project - No Development Alternative.	Both Draft General Plan Alternatives designate additional land for development through 2020 and are therefore growth-inducing. Unless the City implements a permanent urban limit line to preclude any additional expansion to the south, the potential for additional growth onto prime agricultural lands would also exist. Designation of land for Urban Reserve also does not foreclose future residential development to the east.		This alternative designates additional land for development through 2020 and is therefore growth-inducing. The Eastern Growth Alternative would open up a new area of growth to the east, resulting in extension of City services into the area. This would promote growth further to the east. Unless the City implements a permanent urban limit line to preclude any additional expansion to the south, it is unlikely that growth pressures to the south would subside. Therefore, the Eastern Growth Alternative is considered as growth-inducing as Draft General Plan Alternatives 1 and 2.

SIGNIFICANT IMPACTS OF ALTERNATIVES

As described in Table 10-1, significant impacts were identified for one or more of the alternatives for the following 11 areas. Note that the impacts of the preferred alternative analyzed in this FEIR are the same as Draft General Plan Alternative 2.

1. Changes in physical arrangement of the community (Eastern Growth Alternative)
2. Conversion of prime agricultural land (No Project - 1988 General Plan Alternative, Draft General Plan Alternatives 1 and 2, Eastern Growth Alternative)
3. Loss of land under Williamson Act contract (Draft General Plan Alternative 2)
4. Creation of conflicts with agricultural uses (Draft General Plan Alternative 2)
5. Failure to accommodate projected housing and population growth (No Project - No Development Alternative)
6. Traffic service levels over General Plan standards (Draft General Plan Alternatives 1 and 2)
7. Conflicts with wastewater treatment facilities (Eastern Growth Alternative)
8. Inadequate school facilities (No Project - 1988 General Plan Alternative, Draft General Plan Alternatives 1 and 2, Eastern Growth Alternative)
9. Cumulative loss of habitat for threatened and endangered species (No Project - 1988 General Plan Alternative, Draft General Plan Alternatives 1 and 2, Eastern Growth Alternative)
10. Decline in regional air quality (No Project - 1988 General Plan Alternative, Draft General Plan Alternatives 1 and 2, Eastern Growth Alternative)
11. Exposure to flood hazards (No Project - 1988 General Plan Alternative, Eastern Growth Alternative)

These are summarized in the following paragraphs.

1. Changes in the Physical Arrangement of the Community

The Eastern Growth Alternative would have a significant impact on the physical arrangement of the community, as it would result in a concentration of new development separated from the rest of Woodland by the wastewater treatment plant site. This would reduce the central function and generalized location of Downtown Woodland, and would fail to achieve many of the *General Plan's* objectives concerning contiguous development, compact development patterns, a centralized Downtown, and efficient infrastructure extensions. This impact is considered significant and unmitigatable.

2. Conversion of Prime Agricultural Land

With the exception of the No Project - No Development Alternative, all the alternatives would result in conversion of prime agricultural soils to urban development since they all include land within the existing city limits and existing Urban Limit Line.

The Eastern Growth Alternative would also result in additional conversion of agricultural lands to urban uses, but primarily those having lower quality soils.

Draft General Plan Alternatives 1 and 2 would both result in the conversion of additional prime agricultural soils, with Alternative 1 resulting in the most conversion of the highest quality soils. The impact of conversion of agricultural lands is considered significant and unavoidable.

3. Nonrenewal or Cancellation of Williamson Act Lands

All the alternatives except the No-Project - No Development Alternative would result in the development of lands currently under Williamson Act contract. Most of these lands have been nonrenewed; Draft General Plan Alternative 2 would result in the nonrenewal or cancellation of 160 acres of land currently in Williamson Act contract, although this parcel has lower quality soils. This is considered a significant impact.

4. Urban/Agricultural Conflicts

Draft General Plan Alternative 2 would result in conflicts on surrounding agricultural operations. The land use pattern of Alternative 2 would create an agricultural area south of the Urban Limit Line and north of County Road 25A between East Street and SR 113 that would be difficult to farm, since it would be essentially surrounded on two sides by urban development and on a third side by a major roadway. This area would be under pressure to convert to urban development, particularly given its location near an interchange. This impact is considered significant and unmitigatable.

5. Inability to Accommodate Projected Housing and Population Growth

The No Project - No Development Alternative would not allow the City to accommodate any projected growth and would be inconsistent with the adopted *Housing Element* as it would not allow the City to meet its fair share of regional housing needs. As a result, other communities in the region would have to provide for this growth. This impact is considered significant and unmitigatable.

6. Traffic Congestion

Development under Draft General Plan Alternatives 1 and 2 will result in two segments of Main Street exceeding the General Plan's service level threshold of LOS D. Traffic improvements along Main Street between Walnut Street and Third Street require special attention to ensure they are consistent with the overall plan for the Downtown area. Mitigation measures to address this service level could include widening Main Street. This would remove existing buildings and would damage the character of Downtown and was therefore considered infeasible. The *Downtown Specific Plan* recommended exploring one-way couplets for the Downtown area along Main Street and Court Street. Because of the effects on existing uses and very site-specific impacts of implementing this mitigation measure, it was not determined to be feasible without further investigation. This and other methods to address this area will be considered as part of the City's *Street Master Plan*, to be completed after adoption of the General Plan. This therefore remains a potentially significant impact.

The second section of Main Street projected to operate at level of service E is between Industrial Way and the I-5 southbound ramp. Possible improvements that would mitigate this impact could include widening Main Street to six lanes or construction of an improved connection between I-5 and SR 113. Widening of this section would affect existing businesses in this area and was therefore considered infeasible. This area is currently the subject of a *Project Study Report* being prepared by the City. An improved connection will substantially reduce through traffic along this stretch of Main Street, which currently serves as the main connection between these two freeways. This would be a project of regional importance, to remove regional through-traffic along Main Street. Since the City cannot unilaterally guarantee such an improvement to the state highway system, this is still considered a potentially significant impact.

The other potentially significant impact of Alternative 2 is the segment of Gibson Road between Third Street and East Street, which just exceeds the level of service C threshold. This impact could be mitigated by

widening this roadway, but since the *Project Study Report* for the I-5/SR 113 connector will result in a redistribution of trips in this area, it does not appear reasonable to widen it without further evaluation. A new roadway connecting the area southeast of East Street to College or Third Street would also mitigate this impact. The increased traffic on College or Third could be out of character with the residential area, and was therefore not considered desireable for the purposes of this EIR, especially since an improved I-5/SR 113 connection may addess this impact. Without knowing the outcome of the PSR, however, the impact on Gibson Road is still considered a potentially significant impact.

The impacts on the roadway system from development of the Eastern Growth Alternative would be determined based on the specific location of uses. As a currently undeveloped area, the project would have to provide for new roadways within level of service standards. Development in this area would necessitate construction of a new interchange with I-5, a very costly improvement. This improvement is, however, being considered as one of the alternatives for the I-5/SR 113 connector *Project Study Report*. The roadway impacts are considered less-than-significant.

7. Impact of Wastewater Treatment Facilities

The Eastern Growth Alternative would affect both the domestic wastewater treatment plant and the industrial wastewater facility. The industrial wastewater facility would need to be completely relocated, and a new facility would need to be constructed at a new, and presently unknown, location. Since a new facility couuld be located elsewhere, this is considered a less-than-significant impact.

Because of the City's investment in the domestic wastewater treatment plant, relocation of this facility is not considered economically feasible within the time frame of the *General Plan*.. In addition, development of a roadway through the facility to serve growth to the east, while feasible, would also increase the exposure to the plant and would increase the potential for conflicts, and would require additional City security at the plant. These impacts on the wastewater treatment facilities are considered significant, but could be mitigated to a less-than-significant level through the use of buffers, operational changes, and avoidance of roadways through the site.

8. Schools

All the alternatives except the No Project - No Development Alternative would create demand for new school facilities. Funding for new schools has become a complicated matter, with very limited state funding available. Policies of the plan seek to promote high quality education facilities in Woodland and assist the Woodland Joint Unified School District in planning for and funding the development of needed new school facilities. Given the uncertainty regarding the availability of future state funding and the ability to pass local voter-approved school bonds, however, the impact on new schools is considered a potentially significant impact. There are no additional mitigation measures that would reduce this impact to a less-than-significant level.

9. Loss of Habitat for Threatened and Endangered Species

All the alternatives except the No Project - No Development Alternative would result in the loss of habitat for threatened, and endangered species as identified in the *Yolo County Habitat Conservation Plan*'s *Biological Resources Report*. All habitat converted in the No Project - Existing General Plan Alternative would be converted under the other three alternatives. Draft General Plan Alternatives 1 and 2 would result in the loss of foraging habitat for Swainson's Hawk through the conversion of agricultural habitats, primarily alfalfa pasture and row crops, to urban development.

The Eastern Growth Alternative would also result in the loss of Swainson's Hawk foraging habitat, and would result in the greatest loss of wetlands habitats, including alkali sinks and vernal pools. The wetlands habitat located in the Eastern Growth Area are among the scarcest in the county and support the highest concentrations of state and federally endangered, threatened, and candidate species. According to the *Draft HCP*, of the 465,908 acres in the study area in the county, wetland habitat comprises 4 percent or approximately 18,992 acres. The alkaline sinks subtype, which constitutes significant land within the Eastern Growth Alternative, is specifically identified in the *Draft HCP* as a special habitat area. The *Draft HCP* describes it as a "regionally scarce habitat type" and "critical to certain HCP species." Of the five habitat types described in the *Draft HCP* and this *EIR*, the *Draft HCP* concludes that wetland habitats support in one way or another, 23, or 79 percent, of the 29 target species. In comparison, the agricultural habitat predominant in the southern growth alternatives, comprises 82 percent (380,942 acres) of the study area in the county, and provides benefits to 11, or 37 percent, of the target species.

The impact on vegetation and wildlife resources from the cumulative loss of habitat is considered significant for all four alternatives, although the impacts are the least for the No Project - Existing General Plan Alternative. The Eastern Growth Alternative is considered to have the greatest impact, since the wetlands habitats includes the greatest diversity of rare and endangered species and would be more difficult to mitigate. EIP Associates, preparers of the *Draft HCP*, acknowledge that although theoretically possible, it would be very difficult to mitigate substantial loss of this habitat, requiring identification of areas elsewhere in the county with alkaline soils where species could be introduced.

The impacts on vegetation and wildlife resources could be mitigated to a less-than-significant on a project level through the *General Plan* policies, but the cumulative loss of habitat would be a signficant impact for all alternatives (except the No Project - No Developmetn Alternative). Adoption of the Countywide *Habitat Conservation Plan* would mitigate these impacts. Although the City has committed to the preparation and adoption of such a plan, its content and future adoption cannot be guaranteed. The impact is therefore considered potentially significant.

10. Decline in Regional Air Quality

All the alternatives except the No Project - No Development Alternative would result in increased pollutant emissions and degradation of regional air quality. The extent of the impact is generally related to the amount of population and employment growth, and the land use pattern and number of vehicle trips promoted by the land use pattern. The No Project - Existing General Plan Alternative would have the least impact on regional air quality since it would accommodate the least population and employment growth. Draft General Plan Alternatives 1 and 2 have the same population and employment holding capacity, and would result in essentially the same impacts on regional air quality. The Eastern Growth Alternative would have the greatest impact on regional air quality because of the land use pattern it would create. The location of new development separated from the rest of the community by the wastewater treatment plant would result in longer trips within Woodland, and would reduce the potential for bicycling and walking. The impacts on air quality are considered significant and unavoidable.

11. Exposure to Flood Hazards

The two alternatives that would permit residential development in areas designated or identified by federal agencies as within the 100-year flood plain were considered to expose people and structures to flood hazards, which were therefore considered to have significant impacts to health and safety. The No Project - Existing General Plan Alternative allows new residential development north of Kentucky Avenue. Territory with the Eastern Growth Alternative west of the wastewater treatment plant is located within the 100-year floodplain

as designated by FEMA's Flood Insurance Rate Maps. Although these impacts could be addressed through flood control improvements or through the construction of levees around these areas, the feasibility, costs, and environmental impacts of these improvements are unknown and cannot therefore be guaranteed.

CONCLUSION

The No Development Alternative is the environmentally superior alternative of the five alternatives, since it would not result in any changes to the environment in the Woodland area. The No Project - No Development Alternative would make no changes to the existing development pattern, and would therefore not result in any environmental impacts, although growth in the region would be expected to increase traffic on state highways with associated air quality impacts. Because of its relatively few impacts, this alternative would be the environmentally superior alternative. This alternative, however, would not allow the City to provide for any housing or employment development or redevelopment; and would be inconsistent with its policies for economic development, and would prevent the City from providing adequate opportunities for meeting its regional fair share housing responsibilities.

The No Project - 1988 General Plan Alternative would also be environmentally superior to the other three alternatives. The *1988 General Plan* generally provides for less development than the preferred alternative, and as would be expected, would have fewer associated impacts. The *1988 General Plan*, however, would allow residential development within a floodplain area. It would be environmentally superior to the preferred alternative, but to a lesser extent than the No Project - No Development Alternative.

This alternative would, however, allow for residential development within flooding areas, exposing more people to risks associated with potential flooding. In addition, this alternative would not meet the longer term growth projections of the city, and the City would continue to be faced with piecemeal general plan amendment requests rather than considering and mitigating the effects of growth in a comprehensive basis.

Among the remaining three alternatives, each would have significant impacts is different areas. Alternative 1 would result in the greatest conversion of prime agricultural lands, while Alternative 2 would result in loss of land currently under Williamson Act contract. Draft General Plan Alternative 2 would also create agricultural conflicts.

Draft General Plan Alternatives 1 and 2 and the Eastern Growth Alternative would result in the loss of habitat for threatened and endangered species. Draft General Plan Alternatives 1 and 2 would result in the loss of the most agricultural habitat. The Eastern Growth Alternative would result in the greatest loss of wetland habitat areas, especially alkali sinks. The Eastern Growth Alternative is considered to have the greatest impact, since the wetlands habitat includes the greatest diversity of rare and endangered species.

While all three alternatives would have a significant impact on regional air quality, the Eastern Growth Alternative would have the greatest impact due to the land use pattern it would create. The location of new development separated from the rest of the community would result in longer trips within Woodland, and would reduce the potential for bicycling and walking to centralized City services and shopping.

The Eastern Growth Alternative would also result in exposure of people and structures to flooding.

Between the two Draft General Plan Alternatives, the impacts are very similar, but Alternative 2/FEIR preferrred alternative, would be considered environmentally superior to Alternative 1, since it results in slightly less direct conversion of agricultural lands. The distinction is minimal, however.

It is difficult to determine whether the Eastern Growth Alternative or Draft General Plan Alternative 2/FEIR preferrred alternative would be the environmentally superior since it is an issue of environmental values. It is difficult to weigh the implications of conversion of prime agricultural land versus greater impacts on air quality and exposure of people to flood hazards and higher value habitat loss.

The impacts of the two alternatives are compared below.

1. Changes in the Physical Arrangement of the Community

The Eastern Growth Alternative would have a significant impact on the physical arrangement of the community, as it would result in a concentration of new development separated from the rest of Woodland by the wastewater treatment plant site. This would reduce the central function and generalized location of Downtown Woodland, and would fail to achieve many of the *General Plan's* objectives concerning contiguous development, compact development patterns, a centralized Downtown, and efficient infrastructure extensions. The Alternative 2/FEIR preferrred alternative would provide for contiguous development and would not result in a signficant impact on the community's physical arrangement.

2. Conversion of Prime Agricultural Land

Outside the existing Urban Limit Line, Alternative 2/FEIR preferrred alternative would result in the conversion of prime agricultural soils. This is a significant and irreversible impact. The Eastern Growth Alternative would also result in additional conversion of agricultural lands to urban uses, but primarily those having lower quality soils.

3. Nonrenewal or Cancellation of Williamson Act Lands

The Alternative 2/FEIR preferrred alternative would result in the nonrenewal or cancellation of 160 acres of land currently in Williamson Act contract, although this parcel is of lower quality soils. This is considered a significant impact. The Eastern Growth Alternative also includes land in Williamson Act contract, but all properties have filed for nonrenewal.

4. Urban/Agricultural Conflicts

Alternative 2/FEIR preferrred alternative would result in conflicts on surrounding agricultural operations. The land use pattern would create an agricultural area south of the Urban Limit Line and north of County Road 25A between East Street and SR 113 that would be difficult to farm, since it would be essentially surrounded on two sides by urban development and by a third side by a major roadway. This area would be under pressure to convert to urban development, particularly given its location near an interchange. This impact is considered significant and unmitigatable.

5. Traffic Congestion

Development under Alternative 2/FEIR preferrred alternative would result in two segments of Main Street exceeding the General Plan's service level threshold of LOS D. Traffic improvements along Main Street between Walnut Street and Third Street require special attention to ensure they are consistent with the overall plan for the Downtown area. Mitigation measures to address this service level could include widening Main Street. This would remove existing buildings and would damage the character of Downtown and was therefore considered infeasible. The *Downtown Specific Plan* recommended exploring one-way couplets for the Downtown area along Main Street and Court Street. Because of the effects on existing uses and very site-

specific impacts of implementing this mitigation measure, it was not determined to be feasible without further investigation. This and other methods to address this area will be considered as part of the City's *Street Master Plan*, to be completed after adoption of the General Plan. This therefore remains a potentially significant impact.

The second section of Main Street projected to operate at level of service E is between Industrial Way and the I-5 southbound ramp. Possible improvements that would mitigate this impact could include widening Main Street to six lanes or construction of an improved connection between I-5 and SR 113. Widening of this section would affect existing businesses in this area and was therefore considered infeasible. This area is currently the subject of a *Project Study Report* being prepared by the City. An improved connection will substantially reduce through traffic along this stretch of Main Street, which currently serves as the main connection between these two freeways. This would be a project of regional importance, to remove regional through-traffic along Main Street. Since the City cannot unilaterally guarantee such an improvement to the state highway system, this is still considered a potentially significant impact.

The other potentially significant impact of Alternative 2/FEIR preferrred alternative is the segment of Gibson Road between Third Street and East Street, which just exceeds the level of service C threshold. This impact could be mitigated by widening this roadway, but since the Project Study Report for the I-5/SR 113 connector will result in a redistribution of trips in this area, it does not appear reasonable to widen it without further evaluation. A new roadway connecting the area southeast of East Street to College or Third Street would also mitigate this impact. The increased traffic on College or Third could be out of character with the residential area, and was therefore not considered desireable for the purposes of this EIR, especially since an improved I-5/SR 113 connection may addess this impact. Without knowing the outcome of the PSR, however, the impact on Gibson Road is still considered a potentially significant impact.

The impacts on the roadway system from development of the Eastern Growth Alternative would be determined based on the specific location of uses. As an undeveloped area, the project could provide for new roadways within level of service standards. Development in this area would necessitate construction of a new interchange with I-5, a very costly improvement. This improvement is, however, being considered as one of the alternatives for the I-5/SR 113 connector *Project Study Report*. The roadway impacts are considered less-than-significant.

6. Impact of Wastewater Treatment Facilities

The Eastern Growth Alternative would affect both the domestic wastewater treatment plant and the industrial wastewater facility. The industrial wastewater facility would need to be completely relocated, and a new facility would need to be constructed at a new, and presently unknown, location. Since a new facility couuld be located elsewhere, this is considered a less-than-significant impact.

Because of the City's investment in the domestic wastewater treatment plant, relocation of this facility is not considered economically feasible within the time frame of the *General Plan*. In addition, development of a roadway through the facility to serve growth to the east, while feasible, would also increase the exposure of the plant and increase the potential for conflicts, and would require additional City security at the plant. These impacts on the wastewater treatment facilities are considered significant, but could be mitigated to a less-than-significant level through the use of buffers, operational changes, and avoidance of roadways through the site.

7. Schools

Both alternatives would create similar demand for new school facilities. Funding for new schools has become a complicated matter, with very limited state funding available. Policies of the plan seek to promote high quality education facilities in Woodland and assist the Woodland Joint Unified School District in planning for and funding the development of needed new school facilities. Given the uncertainty regarding the availability of future state funding and the ability to pass local voter-approved school bonds, however, the impact on new schools is considered a potentially significant impact for both alternatives. There are no additional mitigation measures that would reduce this impact to a less-than-significant level.

8. Loss of Habitat for Threatened and Endangered Species

Both alternatives would result in the loss of habitat for threatened, and endangered species as identified in the *Draft Yolo County Habitat Conservation Plan.* Alternative 2/FEIR preferrred alternative would result in the loss of foraging habitat for Swainson's Hawk through the conversion of agricultural habitats, primarily alfalfa pasture and row crops, to urban development.

The Eastern Growth Alternative would also result in the loss of Swainson's Hawk foraging habitat, and would also result in the greatest loss of wetlands habitats, including alkali sinks and vernal pools. The wetlands habitat located in the Eastern Growth Area are among the scarcest in the county and support the highest concentrations of state and federally endangered, threatened, and candidate species. According to the *Draft HCP*, of the 465,908 acres in the study area in the county, wetland habitat comprises 4 percent or approximately 18,992 acres. The alkaline sinks subtype, which constitutes significant land within the Eastern Growth Alternative, is specifically identified in the *Draft HCP* as a special habitat area). The *Draft HCP* describes it as a "regionally scarce habitat type" and "critical to certain HCP species." Of the five habitat types described in the *Draft HCP* and this *EIR*, the *Draft HCP* concludes that wetland habitats support in one way or another, 23, or 79 percent, of the 29 target species. In comparison, the agricultural habitat predominant in the southern growth alternatives, comprises 82 percent (380,942 acres) of the study area in the county, and provides benefits to 11, or 37 percent, of the target species.

The impact on vegetation and wildlife resources from the cumulative loss of habitat is considered significant for both alternatives. The Eastern Growth Alternative is considered to have the greatest impact, since the wetlands habitats includes the greatest diversity of rare and endangered species and would be more difficult to mitigate. EIP Associates, preparers of the *Draft HCP*, acknowledge that although theoretically possible, it would be very difficult to mitigate substantial loss of this habitat, requiring identification of areas elsewhere in the county with alkaline soils where species could be introduced.

The impacts on vegetation and wildlife resources could be mitigated to a less-than-significant on a project level through the *General Plan* policies, but the cumulative loss of habitat would be a signficant impact for all alternatives (except the No Project - No Development Alternative). Adoption of the Countywide *Habitat Conservation Plan* would mitigate these impacts. Although the City has committed to the preparation and adoption of such a plan, its contents and future adoption cannot be guaranteed. The impact is therefore considered potentially significant.

9. Decline in Regional Air Quality

Both alternatives would result in the increased pollutant emissions and degradation of regional air quality. The extent of the impact is generally related to the amount of population and employment growth, and the land use pattern and number of vehicle trips promoted by the land use pattern. The Eastern Growth

Alternative would have the greatest impact on regional air quality because of the land use pattern it would create. The location of new development separated from the rest of the community by the wastewater treatment plant would result in longer trips within Woodland, and would reduce the potential for bicycling and walking. The impacts on air quality are considered significant and unavoidable.

10. Exposure to Flood Hazards

Territory with the Eastern Growth Alternative west of the wastewater treatment plant is located within the 100-year floodplain as designated by FEMA's Flood Insurance Rate Maps. Although these impacts could be addressed through flood control improvements or through the construction of levees around these areas, the feasibility, costs, and environmental impacts of these improvements are unknown and cannot therefore be guaranteed.

Environmentally Superior Alternative

As evidenced by this discussion, determination of the environmentally superior alternative (other than the two No Project Alternatives) is difficult. Most of the impacts of the Eastern Growth Alternative could theoretically be mitigated through funding and engineering solutions, although the ability of new development to finance this level of mitigation is questionable. The conversion of prime agricultural land from development under Alternative 2/FEIR preferrred alternative, however, would be irreversible. The Eastern Growth Alternative was therefore considered environmentally superior to DEIR Alternatives 1 and Alternative 2/FEIR preferred alternative.

10.5 SIGNIFICANT IRREVERSIBLE EFFECTS

CEQA requires that EIRs describe any significant irreversible environmental changes which would be involved in the proposed action should it be implemented.

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as roadway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with new development that would be permitted under the *General Plan*. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

Conversion of prime agricultural soils and conversion of wildlife habitat areas are considered irreversible environmental changes of the *General Plan*.

10.6 GROWTH-INDUCING IMPACTS

CEQA requires that EIRs address the growth-inducing impact of the proposed action. The *CEQA Guidelines* require that EIRs discuss the ways in which a proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a wastewater treatment plant might, for example, allow for more construction in service areas). Increases in the population may further tax existing community service facilities so consideration must be given to this impact. The *Guidelines* also call for EIRs to discuss the characteristic of some projects that may encourage

and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

Arguably, any general plan that designates undeveloped land for future development can be defined as "growth-inducing." Since one of Woodland's clear objectives in updating its General Plan is the promotion of economic development and accommodation of demand for residential growth, this is the case with the *General Plan*, particularly in respect to areas designated for new development. In promoting such development and accommodating such growth, the *General Plan*, however, attempts to address the potentially adverse implications through policies, programs, and proposals for adequate infrastructure, promotion of a reasonable balance between jobs and housing, and protection of environmentally-sensitive resources.

10.7 CUMULATIVE IMPACTS

The *CEQA Guidelines* require a discussion of the potential cumulative impacts that could result from a proposed project in conjunction with other projects in the vicinity. Cumulative impacts occur when two or more individual effects together create a significant environmental impact, or if they compound or increase other environmental impacts. Cumulative impacts can result from individually minor but collectively significant projects taking place simultaneously or over time.

As a practical matter, an EIR on a comprehensive general plan is an assessment of the cumulative impacts of development within the area covered by the plan. The impact analyses contained in this *EIR* are, in effect, cumulative analyses because they examine the cumulative effects of growth over the next 25 years in Woodland. On a large cumulative scale, the traffic section (and, by association, air quality and noise) takes into account regional effects. The *General Plan* sets out policies and programs to address the potentially adverse cumulative effects of new development.

The cumulative land use analysis focuses on the buildout of the *General Plan*, including the development of all commercially and industrially designated land which the absorption study concluded would not be completely developed by the year 2020. The following describes cumulative impacts addressed in each of the topical chapters of this *EIR*.

LAND USE AND AGRICULTURAL RESOURCES

The cumulative land use analysis focuses on proposed development in and around Yolo County. Cumulative impacts related to land use include the general intensification of land uses in the region. Major areas of proposed growth in the region include Woodland, Davis, South Sutter County, and North Natomas area. Development of these areas would result in the conversion of agricultural land to urban uses. Conversion of agricultural land in Woodland will contribute to the overall conversion of farmland occurring throughout Yolo County and in neighboring counties. Urban and suburban development in the Sacramento Valley will continue to result in the conversion of the state's most valuable farmland and loss of production from these farmlands. Loss of production from these lands will have an adverse effect on the overall agricultural economy.

TRAFFIC

The cumulative impact analysis is implicit in Chapter 4 of this *EIR*. The traffic model used for this analysis is consistent with the SACMET traffic model used by the Sacramento Area Association of Governments (SACOG) to analyze forecasted growth throughout the SACOG region.

WATER SUPPLY

The cumulative analysis of water supply considers the county's groundwater basin. Accommodation of projected growth in communities relying on groundwater supply as a municipal water source along with continuing agricultural use of water in the basin may continue to deplete groundwater supplies. Water conservation measures for both municipal and agricultural uses, exploration of surface water supplies, recharge of the groundwater basin, and participation in a basinwide management plan would serve to reduce the depletion of the groundwater.

VEGETATION AND WILDLIFE RESOURCES

Urban, suburban, and rural development in Yolo County, as well as agriculture, mining, recreation uses will together result in significant impacts on native biological resources. The cumulative effects of habitat conversion and quality reduction will occur at an increasing rate as the human population grows, and housing, commercial centers, roads, and other infrastructure are built.

AIR QUALITY

The cumulative impact analysis for air quality is contained in the air quality section of Chapter 8, Environmental Resources. The traffic volumes upon which the air quality analysis is based are described in Chapter 4, Transportation, and are cumulative in nature, as described previously.

Development under the *General Plan* is part of a continuing pattern of urbanization in the Sacramento Valley Air Basin. The overall cumulative effect of new development throughout the air basin will slow the rate of improvement and/or require enactment of more stringent control measures throughout the basin.

GEOLOGIC HAZARDS

Accommodating projected growth in Woodland combined with development in surrounding communities would expose a large number of people and structures to seismic shaking and associated seismic risks such as inundation from ruptured dams. In the event of a large earthquake affecting the region, emergency services within each jurisdiction would be stressed.

NOISE

The cumulative noise assessment is contained in the noise section of Chapter 9, Health and Safety. The analysis focuses on noise sources along all the major transportation corridors, based on the cumulative traffic analysis as described previously.

10.8 MITIGATION MONITORING

CEQA prohibits a public agency from approving or carrying out a project for which an environmental impact report identifies significant environmental effects, unless one of specified findings relative to mitigation of

those effects has been made. Section 21081.6 of the State of California's *Public Resources Code* states that when an agency approves a project subject to implementing mitigation measures (in an EIR or Negative Declaration), the public agency must adopt a reporting or monitoring program for the changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment.

The policies and programs of the *Policy Document* operate to mitigate most of the impacts of new development under the *Plan*. Under Implementation Program 10.1, the City must annually review the *General Plan Policy Document*. As stated in the program, this review shall be used to satisfy the requirements for a mitigation monitoring program.