

707.678.1655 | PHONE 1170 N. Lincoln Street, Ste. 110, Dixon, CA 95620

March 5, 2025

Attn: Brian Millar City of Dixon Community Development Department 600 East A. St., Dixon, CA 95620 <u>PlanningCommission@cityofdixonca.gov</u>

Re: the Campus / Dixon 257 Project – Public Comments on FINAL EIR (EIR), proposed changes to NEQ Specific Plan, and proposed Development Agreement

In addition to the Final EIR for the Campus / Dixon 257 Project, the Planning Commission is being asked to consider major revisions to the NEQ Specific Plan and a Development Agreement which were first released to the public in a 721 page staff report on February 25, 2025 (one week prior to meeting). There are proposed changes, with potential significant impacts on the surrounding land uses and infrastructure, which have not been properly noticed, reviewed or considered. This project is being rushed without proper review.

Approval of Final EIR

In moving forward with the Final EIR, the City of Dixon and the project proponent have ignored Dixon Resource Conservation District's comments and concerns articulated in letters & oral comments from June 2023, September 2023, February 2024, July 2024 and November 2024 (see attached). Please consider all of these prior comments as incorporated in their entirety in this letter, and as part of the record before the City of Dixon in considering approval of the Final EIR. If the project is approved, Dixon RCD maintains that the City will be violating key terms of the Dixon Regional Watershed Joint Powers Authority Agreement and that the City is assuming responsibility for future impacts to downstream landowners and facilities.

Since the DRAFT EIR, other than a location change, there has been no change to or additional information provided with the drainage plan. The plan continues to propose to take flood flows from offsite, which are currently detained on the property, and divert them around the project in a channelized, concentrated manner and discharge them unmanaged onto private property at Pedrick Road. The project's drainage plan estimates the property's current flood storage at 30 acre feet, but does not include design information on how the proposed drainage facilities will provide for an equal amount of storage during flood events.

The current version of the Final EIR incorrectly locates the project in the "Covell Drain Watershed" of Yolo County.

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In addition, although, the Campus / Dixon 257 project proposes a stand-alone 255 acre foot <u>retention</u> basin to retain the development drainage, the various documents under review include conflicting references to the potential to modify the retention basin design in the future to make it a <u>detention</u> basin with discharges to downstream drainage facilities.

The City of Dixon must clarify what exactly is being approved at this time in terms of drainage facilities and assure that any future modifications to the design of Dixon 257 retention pond and plans that involve other developments or City plans for regional drainage projects will be subject to separate environmental review process(es).

Proposed Changes to NEQ Specific Plan

We urge the Planning Commission to recommend that the City remove the proposed changes to the NEQ Specific Plan related to regional drainage plans until there is a regional drainage solution that has been agreed to by regional drainage agencies (including Dixon RCD, Maine Prairie Water District, Reclamation District 2068, Solano County Water Agency and Solano County).

Below are a few of the most concerning proposed changes.

- Pg 269 proposed change to "Land-use Goals" "7. Integrate proposed drainage areas, landscape frontage treatments and agricultural buffers as parts of a plan-wide open space system. Provide housing opportunities for residents proximate to jobs and regional transportation systems."
- Pages 282-283 Reduces the "Major Roads, Drainage Easements and Open Space" landuse designation by 96.4 acres (129.1 acres to 32.7 acres) and redistributes that acreage into proposed developed acres.
- Page 306 References potential features of a regional drainage plan. This is premature as to date no acceptable NEQ drainage plan has been proposed.
- Page 369-370 introduces a conceptual drainage plan schematic with proposed facilities that have so far been rejected by surrounding drainage agencies.

Proposed Development Agreement

In waiving drainage impact fees, it is unclear how the City will ensure that the Campus / Dixon 257 project will be "required to provide funding for a master drainage plan." as stated in the NEQ Specific Plan and how the development will pay a fair share of ongoing maintenance of drainage infrastructure, both within and outside of the NEQ.

Dixon RCD would like to again implore the City of Dixon and NEQ developers to work cooperatively with regional drainage partners to properly address significant drainage impacts, which to date has not happened.



Sincerely,

Kelly Huff, District Manager Dixon Resource Conservation District

Attachments:

DRCD Comment Letter 060223 DRCD Comment Letter 092223 DRCD Oral Comments Provided to City Council 020624 DRCD Comment Letter 070924 DRCD Letter and MBK Review of Modeling 100924 MBK Final Review Memo 111824

Cc: Raffi Boloyan, City of Dixon Community Development Christopher Fong, City of Dixon Engineering Justin Noutary, Reclamation District 2068 Meda Benefield and Don Holdener, Maine Prairie Water District Alex Rabidoux and Gustavo Cruz, Solano County Water Agency Greg Bardini, Morton & Pitalo Rich Seithel, Solano County LAFCO



June 2, 2023

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

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

Dear Brian:

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

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

Drainage Study

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

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

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

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

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

Proposed Changes to NEQ Specific Plan

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

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

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

Sincerely,

Kelly Huff, District Manger Dixon Resource Conservation District

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



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September 22, 2023

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

Re: The Campus/NOP comments

Dear Raffi:

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

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

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

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

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



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

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

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

West Yost Associates Schedule of Completion Dates

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



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

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

Sincerely,

Kelly Huff, District Manager Dixon Resource Conservation District

- Encl: DRCD Dixon 257 Comment Letter 060223 Pages 15-16 from 2004 JPA Agreement
- Cc: City of Dixon Engineering Department Jim Lindley, City Manager Douglas White, White Brenner Justin Noutary, Reclamation District 2068 Don Holdener and Meda Benefield, Maine Prairie Water District Alex Rabidoux & Gustavo Cruz, Solano County Water Agency Doug Moore, West Yost Associates Greg Bardini, Morton and Pitalo, Inc. Rich Seithel, Solano County LAFCO



June 2, 2023

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

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

Dear Brian:

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

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

Drainage Study

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

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

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

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

Sincerely,

Kelly Huff, District Manger Dixon Resource Conservation District

Cc: Deborah Barr, City of Dixon Engineer Justin Noutary, Reclamation District 2068 Don Holdener and Meda Benefield, Maine Prairie Water District currently 77.5 cfs. Nothing in this Agreement modifies the rights of lands formerly owned by Sork *et al.* to drain into the DRCD drainage system, which lands are more particularly shown by the map attached as Exhibit J.

(k)

With regard to drainage from the Northeast Quadrant of the City, the Parties agree that the City is entitled to drain into the DRCD drainage system the present natural runoff from the Northeast Quadrant, without concentration or acceleration, recognizing that, prior to development, most rainfall was impounded within the Northeast Quadrant due to natural variability in topography. The Parties agree that, pursuant to this Agreement and for the purpose of settling potential disputes, the baseline present storm flows from the Northeast Quadrant shall be set at 23.1 cfs for a 5-year storm, 27.2 cfs for a 10-year storm, and 37.2 cfs for a 100year storm measured at the 30-inch CMP in the railroad embankment as set forth in a letter from West Yost & Associates to the City dated June 16, 2004 and attached hereto as Exhibit K.

- (i) All storm flows shall be released from the Northeast Quadrant at the greatest rate consistent with the terms of paragraph 10(f)(3)(a).
- (ii) The City will address, in a manner fully consistent with applicable law, any storm flows in excess of the baseline flows as part of its review of development projects in the Northeast Quadrant and will cause there to be sufficient mitigation for the effects, if any, of such excess storm flows.
- (iii) The City shall address, in a manner fully consistent with applicable law, the question of whether development in the Northeast Quadrant may be required to pay for downstream improvements needed to convey the baseline storm flows from the Northeast Quadrant to Haas Slough without damage.
- **(l)**

With regard to drainage originating outside the Northeast Quadrant of the City but draining into the Northeast Quadrant, the Parties acknowledge that they must accept the natural runoff from such lands, without concentration or acceleration. The Parties further acknowledge that such drainage has been concentrated and accelerated by virtue of the construction of Interstate 80 and other improvements.

> Joint Powers Agreement Dixon Regional Watershed Joint Powers Authority Page 15 of 22

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

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

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

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

Joint Powers Agreement Dixon Regional Watershed Joint Powers Authority Page 16 of 22

(4)



February 6, 2024

City of Dixon City Council Planning Commission 600 East A. St., Dixon, CA 95620

Re: The Campus / Dixon 257 Project

Good evening. My name is Kelly Huff. I am the District Manager of the Dixon Resource Conservation District and I also serve as Secretary for the Dixon Regional Watershed Joint Powers Authority. Tonight I am offering comments on behalf of Dixon RCD only.

I would like to note that I requested to give a short presentation with exhibits to help illustrate our concerns. Dixon RCD has done everything within our power over the last 3 years to avoid this situation. Unfortunately, to date, we have not received information indicating that the Draft EIR will adequately address the significant impacts from the Dixon 257 Project, nor that it will be required to be a part of the ultimate regional drainage solution for this area. I am providing comments at this point with the hope that the EIR for Dixon 257 will appropriately include a drainage plan that is acceptable to the regional drainage partners, including Dixon RCD. If not, we will have a very serious problem and it will be a strong statement from the City to surrounding agriculture that you no longer plan to honor the commitments made by previous city officials in the 2004 JPA Agreement. The details of our concerns, specific to Dixon 257, have been spelled out in formal letters submitted to the City in June and September 2023. Thank you Raffi for including those with the staff report. The concerns raised in those letters have not yet been addressed.

Two of the primary concerns are that:

1. The drainage plan for Dixon 257 relies on displacement and diversion of floodwaters that historically have flowed onto and been detained within the NEQ and Milk Farm properties. The significant environmental impacts, from diverting, channelizing, re-directing and accelerating this water, to neighboring and downstream properties needs to be analyzed and addressed in the drainage plan.

2. The drainage plan proposes to release that water on third party private property at the railroad tracks, at rates that would greatly exceed the capacity of downstream systems, presumably to let it find its way to Dixon RCD's Tremont 3 facilities which are 1.5 to 2.5 miles away. This must be disclosed and analyzed in the EIR.

Dixon RCD has major concerns with the City's conceptual drainage plan as it has been presented to date and disagrees with the proposal to include it in the NEQ Specific Plan until the JPA member agencies have reached agreement.

Since the JPA was formed in 2004, until recently, Dixon RCD and the City of Dixon have worked very closely on regional drainage. In fact we have two exceptional examples of joint regional drainage projects in place that effectively manage storm water in a way that works for the surrounding agricultural lands and for the City: Pond A to Lateral 1 and Pond C to Laterals 2 & 3. Our hope and expectation is that we will have something similar in the Northeast Quadrant/Tremont 3 drainage. Unfortunately, with what has been proposed to date, we have a ways to go before we even reach an acceptable interim plan and we are far from a regional solution that would meet the terms of the JPA agreement. As uncomfortable as it is to have to bring this message to the council at this point, it is critical to express it as soon as possible for everyone's benefit. We sincerely hope that the City and the developers will take these comments seriously and that we can work together on an acceptable interim drainage plan and ultimately a regional drainage solution for this area.

Sincerely,

Helly Hu

Kelly Huff, District Manager Dixon Resource Conservation District



July 9, 2024

Attn: Brian Millar City of Dixon Community Development Department 600 East A. St., Dixon, CA 95620 <u>bmillar@cityofdixon.us</u>

Re: Comments Regarding The Campus / Dixon 257 Project – Draft Environmental Impact Report (SCH #2023080739)

Dixon Resource Conservation District (Dixon RCD) thanks the City of Dixon (City) for the opportunity to provide comments on the Draft Environmental Impact Report for The Campus Project (DEIR).

Dixon RCD's review of the DEIR and supporting documentation demonstrates that the DEIR fails to comply with the requirements of the California Environmental Quality Act (CEQA). As explained in these comments, the DEIR lacks substantial evidence to support its conclusions with regard to the Project's significant drainage impacts. The City may not approve the Project until the City revises and recirculates the Project's DEIR to accurately analyze or minimize these impacts to the greatest extent feasible.

The DEIR Fails To Disclose, Analyze And Mitigate Potentially Significant Impacts

Dixon RCD's primary concern continues to be potential impacts from the plan to re-route water that originates offsite. Specifically, the DEIR does not sufficiently demonstrate the basis for its determination that impacts 3.10-3 and 3.10-8, related to drainage will be less than significant, with or without mitigation measures. Dixon RCD has determined that the technical analyses of changes to overland flow routing and the impacts to locations, depths and durations of flooding are missing from the DEIR. Please see attached detailed technical issues that should be resolved in a revised DEIR that is recirculated prior to consideration by City Council.

The Project has the potential to have the following significant impacts:

1. Substantially alter the existing drainage pattern of the area

2. Substantially increase the rate and/or amount of surface runoff in a manner which would result in flooding offsite

3. Contribute runoff water which would exceed the capacity of existing stormwater drainage systems

4. Redirect flood flows

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Additionally, the DEIR and associated drainage study fails to demonstrate that there will not be significant impacts downstream as a result of the Project's plan to re-direct, channelize and accelerate flood flows originating offsite and discharge them to downstream properties and facilities that are without adequate capacity to accept them.

The DEIR fails to address the cumulative effects of conveyance of offsite water around the Project site, with or without additional pipes under Highway 80, or the channel and storm drain system that would re-route water from offsite around the NEQ and The Campus / Dixon 257 Project. In fact the DEIR does not even discuss the planned conveyance of water around the Project site.

The DEIR's discussion of existing drainage conditions and the drainage study fails to disclose and analyze the impacts of the Project related to historical ponding and detention of storm water on the Project site.

The "Regional Drainage System and Regional Detention Basin as a Potential Alternative to the Proposed Retention Basin" referenced on page 5 of the Project's Drainage Study relies on technical work that is ongoing and regional drainage project(s) that have not yet been decided on. The DEIR does not adequately address possible future scenarios by developing performance standards that will ensure no significant impacts on the existing drainage system. In addition, there are inconsistencies, related to calculations of existing flood storage on the Project site, between the technical work for the regional drainage efforts from West Yost and the Dixon 257 Drainage Study and DEIR from Morton & Pitalo.

The plan to re-route offsite water is in direct conflict with a key term in the Joint Powers Agreement between the City of Dixon, Dixon RCD, Reclamation District 2068 and Maine Prairie Water District, to not concentrate or accelerate drainage originating outside of the Northeast Quadrant of the City.

For the reasons discussed above, and in the attached "Detailed Technical Review Comments and Questions", the DEIR for the Project is inadequate under CEQA. It must be thoroughly revised to provide legally adequate analysis of, and mitigation for all of the Project's potentially significant impacts. These revisions will necessarily require that the DEIR be recirculated for public review. Until the DEIR has been revised and recirculated, as described herein, the City may not lawfully approve the Project.

Sincerely,

Killy Hul

Kelly Huff, District Manager Dixon Resource Conservation District

Attachments:

2019 Flooded Areas Map – West Yost Associates Detailed Technical Review, Comments & Questions





Dixon RCD Detailed Technical Review, Comments and Questions, based on review by Patrick Ho, MBK Engineers 6/30/2024

- General Comment: Links to HEC-HMS model files were provided in the drainage study but download access was disabled by the uploader and files are not viewable on the browser. Without access to the model files the District cannot fully comment and the City should not move forward until making those files available. Please forward any links to new data to both <u>kelly-huff@dixonrcd.org</u> and <u>ho@mbkengineers.com</u>
- Page 4 of drainage study: The swale starts with up to 57 cfs for 10 year / up to 193 cfs for 100 year and at Pedrick it is 135.9 cfs for 10 year and 204.3 cfs for 100 year. These flow rates cannot be verified based on the report.
- Figure 2 on page 5 of the Drainage Study titled "Pre-Development vs. Post-Development Flow Rates at UPRR" cannot be understood for the following reasons:
 - Axes units are not labeled,
 - UPRR location is unknown.
 - The title Pre- and post- development flow would imply that there would be 2 lines. What do the other two lines mean?
- The detention basin sizing, as well as analysis leading to it, is not complete. The retention basin water balance analysis shows a maximum stored volume of 233.1 ac-ft using the City of Dixon retention basin spreadsheet. The percolation loss assumed is 20 times larger than the spreadsheet template provided by the City of Dixon. The report states that the engineer assumes a loss of 4 inches per day and a specific geotechnical report documenting the long-term percolation rate shall be performed prior to final basin design approval. **The City is deferring an analysis that must occur before the CEQA document is certified.**
- Please report the change in peak flows at Pedrick Road between with-Project and without-Project conditions during the 10-year and the 100-year flood events.
- Per Section 3.1. Pre-Development Conditions, the report states that "The flow is conveyed across the NQSP lands via irrigation ditches and sheet flow."

Does the model simulate sheet flow or is this anecdotal? Moreover, does the model consider that under existing conditions, the pre-development site detains a reasonable volume of water behind roads and embankments before flowing over Pedrick Road?

Elevation versus storage rating curves should be developed using existing digital elevation model (DEM) to validate that the volume of water stored behind roads and major embankments reflects the calculated stages behind them. The report should demonstrate that lands and fields that had the ability to store water is reasonable calculated by the model.

- Per Section 3.2. Post-Development Conditions, the report states that offsite flows will now being collected and conveyed around the project site in a pipe / landscape swale to the existing drainage at Pedrick Road. Under existing conditions the project site has the ability to detain or store water, the narrative implies that the post-project conditions will route water away from the proposed development and simply release offsite drainage onto neighboring properties without an attempt to detain or lag peak flows on the project site. This would alter the existing drainage pattern of the area and contribute runoff water which would exceed the capacity of existing drainage systems.
- Figure 6-5 "Existing Drainage" in the drainage study fails to show the historical flooding on the Dixon 257 Project site. Figure 6-5 is not referenced in the main body of the drainage study. If the intent is to show inundation extent. What flood event is this representing?

Please provide the basis and calculations that estimate that the project site currently provides 30 acre feet of flood storage during a 100-year event and that conclude that "about 14 ac-ft in the 100-year, 4-day design storm) from off-site needed to eliminate downstream drainage impacts."

• The Summary of Results on Page 9 of the Drainage Study concludes that the loss of existing flood storage on-site will not result in any significant increase of off-site flows or increase in downstream water surface elevations, which is mainly a result of removing 260 acres for the existing drainage shed area.

Please provide the modeling and calculations that led to this conclusion.

• It also concludes that there will not be an increase in peak flow and water surface elevations downstream (Union Pacific Railroad) of the project site.

Please provide the modeling and calculations that led to this conclusion.



Kelly Huff <kelly-huff@dixonrcd.org>

Dixon RCD Letter regarding Northeast Quadrant / Milk Farm Regional Drainage

1 message

Kelly Huff <kelly-huff@dixonrcd.org> To: Jim Lindley <jlindley@cityofdixon.us> Cc: Christopher Fong <cfong@cityofdixonca.gov>, Brian Millar <bmillar@cityofdixon.us>, Raffi Boloyan <rboloyan@cityofdixon.us>, Joanna Yac <joanna-yac@dixonrcd.org>

Hi Jim, Chris, Brian and Raffi -

Please find letter attached. Can you please ensure that Dixon City Councilmembers as well as Planning Commissioners are also provided a copy? We will send the original by mail to Jim today.

Thanks,

Kelly Huff District Manager **Dixon Resource Conservation District** 1170 N. Lincoln St., Ste 110 Dixon CA 95620

(707) 678-1655 ext. 102

FINAL DRCD to City 100924.pdf 230K



707.678.1655 | PHONE 1170 N. Lincoln Street, Ste. 110, Dixon, CA 95620

October 9, 2024

Jim Lindley, City Manager City of Dixon 600 East A Street Dixon, CA 95620

Dear Mr. Lindley,

In July 2023, in good faith, Dixon Resource Conservation District (Dixon RCD), along with Reclamation District 2068 and Maine Prairie Water District, supported the City's proposal to move forward with technical work to develop a City Interim Drainage Proposal for the Northeast Quadrant (NEQ) with the understanding that:

 It would result in no new impacts downstream and that the City and City developers were committed to a long-term regional solution that meets the terms of the 2004 Dixon Regional Watershed Joint Powers Authority (JPA) Agreement.

Although the City has expressed that they intend to move forward with the interim projects that have been proposed in the recent West Yost DRAFT technical memos and the Dixon 257/Campus Project DRAFT EIR that relies on this work, we would like to be clear that Dixon RCD does not agree that what has been proposed is sufficient, even in the interim. The disagreement centers on proposed modifications to the pass through water from North of Highway 80 and related impacts downstream. Over the last 18 months, Dixon RCD has formally articulated our concerns and expectations on multiple occasions and we have not been given assurances that our concerns will be addressed. Recently, Dixon RCD hired MBK Engineers to review the West Yost modeling work that is being used to design the City's proposed facilities. The review confirms that there are issues with the way the modeling is calculating the existing conditions in the watershed (specifically related to existing flood storage and overland flow routing) that could lead to significant impacts downstream. Dixon RCD provided this information to West Yost and partner agency staff on September 4th with a request to walk through these issues and we look forward to this conversation, now scheduled for November 20th.

For these reasons, Dixon RCD considers the City's Interim Drainage Proposal, as currently proposed, to not be an acceptable option. Therefore, Dixon RCD believes that the City can proceed with one of two options:

1. Return to drainage project design(s) that meets the discharge limits of 23.1 cfs in 5-year storm, 27.2 cfs in 10-year storm, 37.2 cfs in 100-year storm at the Union Pacific Railroad Tracks which are collectively and contractually agreed to by the JPA member agencies, including the City in the current JPA Agreement;

OR

- 2. Prohibit discharge from and provide 100% retention for developments in the NEQ & Milk Farm (including pass-through water) until a regional drainage solution has been agreed to by the JPA member agencies, including Dixon RCD, which meets all of the following criteria:
 - Fully addresses the pass through water so that it is managed and released when there is sufficient capacity in downstream systems
 - Includes a public facility that would connect discharges from the City's Northeast Quadrant and Milk Farm (at Pedrick Road and at the railroad tracks) to downstream DRCD facilities without impacts.
 - Establishes a fee or cost-share structure that is agreed upon by DRCD, City of Dixon, RD2068 and that appropriately attributes and allocates costs.
 - Provides pre and post project maps of modeled areas of flooding throughout the Tremont 3 Watershed for the 100-year and 10-year storm events as well as for October 2021 and January 1997 historical storm events that has been verified by JPA member agencies.

Dixon RCD would like to formally put the City of Dixon on notice that without the items above, and/or an agreement among the JPA members to modify the agreed-upon discharge limits, the projects in the Northeast Quadrant and Milk Farm do not have permission to discharge into our drainage facilities.

Dixon RCD continues to assert that the projects, as proposed, will cause injury to our drainage facilities and fee-paying lands within our service area; we have consistently communicated our concerns and the limits of our facilities, and the City has not meaningfully responded to our requests for specific assurances that injury will not occur. As such, if the City chooses to move forward with the projects, the City and the Developers accept sole responsibility for any and all impacts of the project(s) to DRCD's facilities and to DRCD's ability to effectively maintain and operate its system, including but not limited to damages to drainage facilities or surrounding land, public safety impacts or injuries associated with flooding of roads and/or drainage facilities, and increased maintenance or replacement costs borne by DRCD as a result of increased flows.

We would like to return to collaborative efforts to find a regional drainage solution that will meet the needs of JPA member agencies and allow for development of the City's Northeast Quadrant. We believe that there may be new opportunities for synergy between a regional drainage solution for Tremont 3 and efforts to improve groundwater recharge in the Solano Subbasin's Northwest Focus Area and/or current or future developments in and around the City.

Sincerely,

David Viguie, President Dixon Resource Conservation District

Cc via Email: Dixon City Council & Planning Commission Members Raffi Boloyan, City of Dixon Community Development Director Brian Millar, Project Planner for the Campus/Dixon 257 Christopher Fong, City of Dixon Engineer Misty Kaltreider, Solano County Department of Resource Management Mitch Mashburn & John Vasquez, Solano County Supervisors Alex Rabidoux, Gustavo Cruz, Solano County Water Agency Justin Noutary, Reclamation District 2068 Meda Benefield, Maine Prairie Water District



Kelly Huff <kelly-huff@dixonrcd.org>

Final MBK Review Memo

1 message

Kelly Huff <kelly-huff@dixonrcd.org>

Fri, Nov 22, 2024 at 2:16 PM

To: Christopher Fong <cfong@cityofdixonca.gov>, "arabidoux@scwa2.com" <arabidoux@scwa2.com>, Brandon Rodriguez

 <dmoore@westyost.com>, "gcruz@scwa2.com" <gcruz@scwa2.com>, "ho@mbkengineers.com" <ho@mbkengineers.com>, "jnoutary@rd2068.com" <jnoutary@rd2068.com>, "meda@mpwd.org" <meda@mpwd.org> Cc: Patrick Ho <ho@mbkengineers.com>

Hi All:

Please see attached Final Revised MBK Technical Memorandum provided by Patrick Ho, to the Dixon Resource Conservation District on November 18th. The potential issues with the modeling that are discussed in the memo confirm for Dixon RCD that what has been proposed to date as interim projects by the City are not viable options, absent additional regional projects and the work is insufficient for a hydraulic impacts analysis, which would be required to move forward. Dixon RCD is still hopeful that our concerns will be addressed, so that we can all move forward on the important and urgent work in the Tremont 3 Watershed. We believe the best way to move forward from here and the best place to focus our energy and resources is toward viable regional projects that would collectively benefit the region, and we appreciate the efforts that SCWA and the Solano GSAs are leading to look for multi-benefit projects in the Upper Tremont 3 Watershed.

Thanks,

Kelly Huff **District Manager Dixon Resource Conservation District** 1170 N. Lincoln St., Ste 110 Dixon CA 95620

(707) 678-1655 ext. 102

11-18-2024 Review of draft DRWM FINAL.pdf 1670K



TECHNICAL MEMORANDUM

DATE:	August 31, 2024 (Final November 18, 2024)
PREPARED BY:	Patrick Ho, P.E., MBK Engineers
PREPARED FOR:	Dixon Resources Conservation District c/o Kelly Huff
SUBJECT:	Review of the draft Dixon Watershed Management Plan (DWMP) Baseline Model Results

1. Introduction and Background

MBK Engineers (MBK) on behalf of Dixon RCD is providing a peer-review of the technical analysis prepared by West Yost Associates (WYA) for the draft Dixon Watershed Management Plan Update. Per the Dixon Watershed Management Plan (DWMP) Update – Phase 3, Tasks 1, 2, and 3 technical memorandum, the primary purpose of the plan is to identify the Tremont 3 Watershed Regional Drainage Improvements. The DWMP is developed by WYA using an XP-SWMM model. MBK Engineers does not own a software license of XP-SWMM and did not request nor receive XP-SWMM model files from WYA. The peer-review is based on summaries from the DWMP Update technical memorandums, the appendices, and electronic data provided by WYA. The approach, findings, and recommendations presented in this technical memorandum is representative of only the system just upstream of Interstate-80 on the Milk Farm property. The rationale for a limited scope review is to develop a high-level description of the model's performance and potential areas of model improvements to support communications of the analysis to Dixon RCD. The review findings and recommendations can be found on Page 16.

2. Meeting with WYA

The initial review of the DRAFT DWMP Update – Phase 3, Tasks 1,2, and 3 Technical Memorandum was provided by Dixon RCD to MBK on January 25, 2024, with an updated DRAFT Technical Memorandum for Tasks 1-4 provided on May 7, 2024. Additional background reports were requested from WYA to fill in gaps to provide a more complete peer review. MBK and WYA met on June 13, 2024, to provide a hands-on review on the setup of the model and general representation of the Tremont 3 watershed drainage system. The in-person review was to establish an orientation of the model rather than come to conclusions on the reasonableness of the analysis. The discussion touched on model extents, catchment extents, link and node representations, and drainage patterns of the Tremont 3 watershed drainage system. Additional electronic spreadsheet files of stage and flow hydrographs were requested for the upper drainage system of the Tremont 3 watershed.

3. Approach to Reviewing Model Results

The development of the DWMP was informed by hydrologic and hydraulic model simulations in an XP-SWMM model of the drainage system. XP-SWMM simulates real storm events based on rainfall to predict movement and storage of water through a network of links and nodes. Nodes represent juncture locations that delineate a change in the link's representation such as conduit sizes, and the joining of a network at confluences or splitting of a network at distributaries. The model could account for and quantify the volume stored at a node which represents a discrete point in the drainage system. Links represent open channels, conduits, pumps, weirs, and outlets that connect a pair of nodes.

During the meeting with WYA, cross-sectional samples of links were shown along the west side of Currey Road north of Interstate-80. The link is an open channel with a drainage ditch along Currey Road and a wide and flat side slope used to represent the open fields adjacent to Currey Road. The elevations used in the open fields appear to be a generalization of the landform from a Light Detection and Ranging (LiDAR) surveys. In SWMM, links that connect a pair of nodes have a uniform section across the entire length of the link. For example, a link that represents a trapezoidal open channel with a 200-foot bottom and side slopes of 50 feet horizontal to 1 feet vertical side slope will be the same or uniform across the entire link.

During a flood level simulation such as the 100-year, 4-day flood, flood depths exceed the crosssectional channel definition specified by the modeler and are then routed through the drainage system without allowing floodwater to spread to adjacent lands by overflowing embankments, roads, and high ground. The SWMM model does not identify the overland flow route rather the modeler lays out the flow path through links and nodes. Therefore, developing model representation of the overflow pathway of lands is crucial in identifying the routing and storage of floodwaters. The engineer must take care to assure all potential overflow pathways are represented in the links and nodes. Per tutorials from the XP-SWMM website from Innovyze (Innovyze, 2024), XP-SWMM has the capabilities to represent 2D overland flow. The use of 2D overland flow features in the DWMP XP-SWMM model was not evident in the meeting with WYA. Figure 1 shows a map of the digital elevation model provided by WYA. On the figure, blue lines represent links, and red dots represent nodes in the DWMP XP-SWMM model. Under the 100-year, 4-day flood hydrodynamics are predominantly overland, a single representation would have challenges representing landform changes especially when flow conveyance contracts such as the ditch along Currey Road where floodwaters traverse southerly towards Interstate-80. Wood Rodger's peer-review (WR, 2021) provided comments that speaks to the same concerns. The following are comments from Wood Rodger's Peer Review:

"Several reaches in the model are represented by hypothetical trapezoidal channels of 100 or 200 feet in width. This is of approximating routing across open landscapes where topographic data is available. Confining flows to hypothetical "narrow" corridors can artificially raise modeled flow depths. Water is likely to spread out and become more shallow and could be approximated using available LiDAR/topographic data."

When flood depths are artificially raised by the model, overtopping flows of road embankments and other elevation features that would impound water may be overestimated, yielding a scenario where artificially increased flows reach downstream systems such as the Dixon RCD drainage system. Under an effects evaluation, Project impacts using this model may potentially be over/under- reported.



Figure 1. Digital Elevation Model, XP-SWMM Links (Blue Lines) and Nodes (Red Points) around the Milk Farm Property

Volume Accounting upstream of I-80 at the Milk Farm

MBK used flow hydrographs provided by WYA in spreadsheets to quantify the volume of flood water that may impound behind embankments as a means to verify if flood depths are artificially raised by the representation of overland flow areas using links and nodes. MBK did not request or receive the XP-SWMM model and are using principles of hydrologic mass balance to verify reasonableness of simulated model results. In addition to flow hydrographs, the WYA provided the following:

- A clip of the digital elevation model used in XP-SWMM
- Shapefiles of model links, model nodes, catchment areas, and basins

The hydrologic mass balance concept quantifies the volume of water stored at nodes within a catchment. Balances are set up by summing hydrograph ordinances from all links connected to a node. The inflow hydrographs directed at a node are accretions (+) to the node while outflow hydrographs that drain water away from that node are depletions (-). When inflow at a time-step of the simulation exceeds outflow, storage of water occurs and therefore volume is quantifiable at the node.

Mass balance summations for three nodes upstream of I-80 at the Milk Farm for the 100-year, 4-day duration event. Figure 2, Figure 4, and Figure 6 shows the links that are connected to each node. Hydrographs from the following links were used to perform the following checks and their hydrographs are show in Figure 3, Figure 5, and Figure 7.

- 1) Volume at T3US-0030 = Link 150 + Link 147 Link 146
- 2) Volume at MilkFarm+ = Link147 + Link296 c-milkF
- 3) Volume at Node241 = Link296 Link295

Total volume upstream of I-80 at the Milk Farm is the sum of all three changes in storage at the nodes T3US-0030, MilkFarm+, and Node241. The maximum total node volume stored on T3US-0030, MilkFarm+, and Node241 is 69 acre-feet (AF). Links also store water but absent details of the link, the volume of water in any given link in each time step is difficult to derive. MBK received results of maximum volume at the links associated with the three nodes listed above. These can be additive to the volume stored on nodes. Link147, Link150, and Link296 and are links immediately upstream of Interstate-80 and their total maximum volume from Figure 10 is 27.5 AF. Therefore, total volume of links plus nodes is 96.5 AF.

Link	Components	Max Volume (acre-feet)			
c-milkF	cMF1	0.0			
	cMF2	0.0			
	olrMF	0.3			
Link146	Cur0050P	0.0			
Link147	MF-Chn	21.8			
Link150	Cur0200P1	0.0			
	Cur0200P2	0.0			
	Cur020003	2.5			
Link295	Link295	0.2			
Link296	Link296	3.2			

Table 1. Volume Stored at Links near Interstate-80

The maximum volume reflects the peak storage impounded at the Milk Farm by I-80. In comparison to data provided by WYA, the maximum volume from Table 7 (Figure 8) from the Drainage Evaluation Task 4, the maximum storage volume at the Milk Farm Area is 140 acre-feet for their BCC, 100-year Result. The discrepancy between the volume of water accounting calculated by MBK and the volume reported in Table 7 may be due to storage in other nodes further upstream. Flow hydrographs upstream were not provided to continue tracking down the accounting of volume upstream of the network.

Elevation-Storage Rating upstream of I-80 at the Milk Farm

Absent flow hydrographs upstream, an elevation-volume rating curve derived from the digital elevation model independent of XP-SWMM could also be used to verify simulated stored volume of water in the Milk Farm area (Figure 9 and Figure 10). Rating curves provide an order of magnitude estimate of volume below a specific elevation. A rating curve was developed by MBK using the combined catchment boundaries of T3US-002, lands due south of T3US-002, T3US-0052, MilkFarm+, T3US-0072, and T3US-0090. WYA provided the digital elevation model file used in XP-SWMM. The rating curve describes the natural land topography's elevation relationship with the volume at or below that elevation. From Figure 10 for example, the point at (386.82 ac-feet, 68.81 feet) indicates that at or below elevation 68.81 feet, the lands below this elevation has a volume of approximately 386.82 acre-feet (AF). At 140 acre-feet from Table 7, the water surface elevation would be approximately 67.73 feet and at 96.5 acre-feet calculated from the volume accounting by MBK, the water surface elevation would be approximately 67.4 feet. Using volume to identify the maximum stage from the elevation-volume rating curve is approximately 0.5 feet within each other. However, the stage hydrograph at the node MilkFarm+ provided by WYA which generally represents the Milk Farm area has a maximum water surface elevation of 68.9 feet.



Figure 2. Continuity Check at Node TSUS-0030

Dixon RCD Review of draft DWMP Baseline Model Results



Figure 3. Flow Hydrographs and Change in Storage at Node T3US-0030

Dixon RCD Review of draft DWMP Baseline Model Results



Figure 4. Continuity Check at Node MilkFarm+



Figure 5. Flow Hydrographs and Change in Storage at Node MilkFarm+

Dixon RCD Review of draft DWMP Baseline Model Results



Figure 6. Continuity Check at Node241





Figure 7. Flow Hydrographs and Change in Storage at Node Node241

								DRAF
Table	7. Summa	ary of Maximu	m Storage Volun	nes and Peak Flo	ws			
		Drainage	BCC, 100-Year	BLUCRDF, 100-	100-Year Change	BCC, 10-Year	BLUCRDF, 10-	10-Year Chan
Data Item	Unit	Facility Size	Result	Year Result	in Results	Result	Year Result	in Results
Milk Farm Area Storage Volume and Flow Summary								
Milk Farm Area Peak Flood Storage	ac-ft	NA	140	28	-112	60.2	14.1	-46
Milk Farm Detention Basin Peak Volume	ac-ft	59	NA	43	NA	NA	30.5	NA
Milk Farm Flood Flow Channel Peak Volume	ac-ft	11	NA	10	NA	NA	2.4	NA
Milk Farm Area Peak Storage Volume Total	ac-ft	70	140	81	-59	60	47	-13
Interstate 80 Peak Flood Flow Over I-80	cfs	NA	141	0	-141	0	0	0
Interstate 80 Peak Flow Into the NEQ	cfs	NA	283	402	119	120	138	18
Interstate 80 Total Volume of Flow Into the NEQ	ac-ft	NA	999	1033	34	502	540	38
Interstate 80 Total Peak Flow	cfs	NA	343	445	102	137	150	13
Interstate 80 Total Volume of Flow Across I-80	ac-ft	NA	1479	1512	33	753	791	38
NEQ Area Storage Volume and Flow Summary (Includes the NEQ Area ar	d the Cha	nnel East of Ped	rick Road)					
NEQ Flood Flow Peak Volume	ac-ft	NA	211	0	-211	80.0	0	-80
NEQ Flood Flow Channel Peak Volume	ac-ft	65	NA	51	NA	NA	24.2	NA
East NEQ Basin Peak Volume	ac-ft	57	NA	43	NA	NA	31	NA
The Campus Detention Basin	ac-ft	402	NA	388	NA	NA	130	NA
NEQ Total Peak Storage Volume	ac-ft	524	211	482	270	80	185	105
Pedrick Road Total Peak Flow	cfs	NA	351	207	-144	217	140	-77
Total Flow Volume Crossing Pedrick Road	ac-ft	NA	1240	987	-253	627	631	4
Peak Flow Pumped to Pond B	cfs	NA	0	18	18	0	18	18
Total Volume Pumped to Pond B	ac-ft	NA	0	386	386	0	149	149
Pedrick Road to the Railroad Storage Volume and Flow Summary	-							
Upstream of Railroad at North Culvert	ac-ft	NA	115	98	-17	16	11	-5
Upstream of Railroad at Central Culvert	ac-ft	NA	197	165	-31	79	69	-10
Upstream of Railroad Campbell's Soup Culvert	ac-ft	NA	78	20	-58	18	6	-12
Pedrick Road to Railroad Total Peak Storage Volume	ac-ft	NA	453	326	-127	145	111	-34
Center Railroad Culvert Peak Flow	cfs	NA	35	34	-1	26	29	3
Total Volume Flowing through the Center Railroad Culvert	ac-ft	NA	589	653	64	414	497	83
Railroad Total Peak Flow Except North Culvert	cfs	NA	86	74	-12	59	55	-4
Total Flow Volume Crossing the Railroad Except North Culvert	ac-ft	NA	1044	869	-175	613	582	-31
Railroad Total Peak Flow	cfs	NA	190	175	-15	123	116	-7
Total Flow Volume Crossing the Bailroad		NA	1971	1715	-256	985	1017	32
Lower Watershed Peak Flow and Volume Summary		•						
At Vaughn Road	cfs	NA	169	155	-14	88	84	-4
Total Flow Volume Crossing Vaughn Road	ac-ft	NA	2554	2301	-253	1315	1318	3
Point A (at Midway Road)	cfs	NA	168	166	-2	117	117	0
Total Flow Volume At Point A (Midway Road)	ac-ft	NA	3434	3222	-212	1759	1763	4

WEST YOST

N-C-074-60-23-13-WP-T4 OPT-T4 ES

Solano County Water Agency Dixon Watershed Management Plan Update ES Last Revised: 04-25-24

Figure 8. Table 7 from West Yost Dixon Watershed Management Plan



Figure 9. Milk Farm Catchment Areas



Figure 10. Elevation-Volume Rating Curve at Milk Farm Catchments





Review Findings and other Recommendations

MBK has performed a volume accounting exercise using flow hydrographs provided by WYA to verify the volume of water impounded at the Milk Farm. The volume of water reported by WYA which is approximately 140-acre feet and the volume calculated by MBK using available flow hydrograph is 96.5 acre-feet. If provided additional flow hydrographs, the volume accounting could show that MBK's calculation generally agrees in terms of order of magnitude with DWRM's XP-SWMM model's calculated volume.

However, the volume accounting exercise highlights the challenge of using XP-SWMM to identify the spread of water across lands during a major design flood such as the 100-year, 4-day flood. XP-SWMM uses a single shape to define the conveyance of a link which represents a canal, pipe, or land to carry water from one node to the next. Using Link147, as it carries significant volume across the Milk Farm, as an example, the link was defined as a "Natural" shape with a channel length of 1,088 feet and a diameter of 3.14 feet. The width of this channel was not provided by WYA but from observing the aerial photography, using a single shape to define the cross-sectional conveyance along the entire channel is a broad generalization. Figure 11 shows a cross-sectional view of the lands represented by Link 147 using the digital elevation model. While the exact dimensions used by the DRWM model was not provided, XP-SWMM would assume a single cross-section through the entire length of the link. When modeled water surface elevations on Link147 exceed the dimensions and shape defined by the model, overflow should occur, but the links do not provide a direct connection to adjacent catchments or other links to represent this overflow. The maximum water surface elevation determined using the elevation-volume rating curve (Figure 10) when compared to the stage hydrograph prepared for the MilkFarm+ node calculated by XP-SWMM and provided by WYA could be demonstrative of this issue. These shape definitions generalize the landform into hypothetical shapes that may misrepresent the land flooding issues under existing conditions ("Base Case Conditions" - "BLUC") as well as with-Project conditions ("Buildout Land Use Conditions with Revised Drainage Facilities"-"BLUCRDF") and the land flood issues may be more relevant to the concerns of locals in the region who require flood inundation extents to evaluate impacts of a project. A 2-dimensional overland flow hydraulic model would be capable of capturing this dynamic which is not deployed in the DRWM's XP-SWMM model.

The engineer can use their judgement in defining the landforms of these links and nodes. The network should then be assessed for its ability to represent an actual flood event through calibration and validation. Wood Rodger's peer review came to a similar conclusion.

The main reason for performing calibration is to more accurately quantify/represent the physical watershed conditions in order to more accurately determine the extent of improvements. The first approach could be accomplished by obtaining new data to quantify infiltration, **storage**, and roughness within the watershed, and make modifications to the model. The major channels and culvert crossings appear to be reasonably well-defined; therefore, **the goal would be to add detail in off-channel areas. Newer topographic mapping could be used to define significant storage** that has been added to the watershed in recent years.

As recommended by Wood Rodgers, providing additional details of off-channel areas in the model with newer topographic mapping to define significant storage is recommended. While the current representation may facilitate the design of larger drainage facilities, the receiving drainage systems such as those operated by Dixon RCD will eventually take on the increased runoff volume. XP-SWMM relies on the engineer to route water to locations where they believe water will flow. Using XP-SWMM results to produce maps of inundation under existing and with-Project conditions is recommended to demonstrate that the engineer has specified the direction, routing, and spread of floodwaters to reflect conditions that can be confirmed by flood records either through gage or locals who can provide anecdotal information on flood extents. Moreover, inundation maps can show impacts to lands are challenging to illustrate using only discrete points which is the current reporting practice.



Figure 11. Cross-Section View of Link 147 using the Digital Elevation Model

4. Addendum to Initial Review

A draft version of this review dated August 31, 2024 was provided to Dixon RCD and the preliminary findings were shared with WYA. WYA provided a response to the August 31, 2024 memo on October 7, 2024 as a back-check to the review provided by MBK (WYA, 2024). MBK concurs that the elevation-rating curve from the August 2024 version uses an area beyond the catchment that would contribute runoff to the Milk Farm area. MBK revised the review memo in November 2024 to correct the rating of elevation-storage. MBK concurs with the assessment that WYA provided as an effect to updating the elevation-storage curve in the Milk Farm Area.

WYA also provided their assessment of the effects of increasing available storage in the Milk Farm area at elevation 69 feet and those effects are as follows:

- More flood water would be stored in the Milk Farm area, and less flood water would overflow into the NEQ across I-80 from the Milk Farm.
- Less floodwater in the NEQ would contribute less flood water to pool at the railroad resulting in a lower WSE at the railroad.
- The lower WSE at the railroad, would contribute less water flowing through the railroad culverts and into the Tremont 3 Drain.
- Thus, the current model is conservative and potentially overestimates (versus possibly underestimates) the flooding of the NEQ and at the railroad. Increasing the size of the Milk Farm Area storage would be a less conservative modeling approach, potentially underestimating the flooding of the NEQ and at the railroad.
- The West Yost Memo sizes infrastructure to control the flooding in the NEQ, including a Campus Basin of 402 ac-ft with a pumped discharge rate from the basin to the Railroad and then to the Tremont 3 Drain of 5.4 cubic feet per second (cfs) to 10.8 cfs. Since the discharge rate would be unchanged by an increase in the storage in the Milk Farm area, it would mean that the size of the Campus detention basin would get smaller (assuming the developed conditions model slightly underestimates the Milk Farm Area flood storage after development). Thus, the NEQ drainage infrastructure is conservative, slightly overestimating the basin size versus possibly underestimating the basin size.
- If the Campus detention basin is reduced in size, the flood protection provided to the Tremont 3 Drain Service Area would decrease.

MBK's Response

WYA has acknowledged that the current model can potentially underestimate the flood storage and overestimate the flood flows crossing Hwy 80 that are directed to the railroad because the layout of links and nodes broadly generalizes floodplain storage and overland flow. For a design analysis, the tool would produce conservative flood control and drainage facilities. MBK's understanding, however, is that the modeling is not yet being used to develop the regional detention facilities that would address the waters coming across Highway 80. Instead, it is being used to conduct an impacts analysis of whether the City-only facilities would create new impacts or not. If the design alternative is selected based on the performance or impacts by comparing a Base Case and a with Project analysis, the underestimation of floodplain storage and overland flow extents would overestimate the volume of floodwaters that would eventually reach the Dixon RCD downstream facilities, without additional regional facilities that address the water that is being diverted around the City developments

5. References

(WR, 2021). Solano County Water Agency – Dixon Watershed Management Plan Peer Review of Tremont 3 Watershed Hydraulic Model.

(WYA, 2024). Review of MBK Technical Memorandum (September 4, 2024). October 7, 2024. West Yost Associate.

(Innovyze, 2024). Tutorial 16 – 1D-2D Flooding. Innovyze, An Autodesk Company. Website: <u>https://help.innovyze.com/space/xps/19661389/Tutorial+16+-+1D-2D+Flooding</u>. Accessed August 22, 2024. **JAMES BEZEK** Director (707) 784-6765

ALLAN CALDER Planning Services Manager (707) 784-6765





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Planning Services Division

bmillar@cityofdixon.us

March 3, 2025

Mr. Brian Millar Project Planner City of Dixon Community Development Department 600 East A. Street Dixon, CA 95620

RE: Campus Project FEIR Comments

Dear Mr. Millar:

Solano County is providing the following comments on the proposed Campus/Dixon 257 Project, which is agendized for your March 5, 2025 Planning Commission meeting.

Impacts to Agricultural Operations and Economy

The County continues to be concerned with the proposed location of commercial, office/business space and residential development, including high-density residential units, in proximity to existing agricultural and associated agricultural supported businesses along Pedrick Road and in the adjacent Industrial-Agricultural Services Area. This includes placing residences across from the Campbell's Soup Supply Company facility (Campbell's), an agricultural processing facility.

Solano County acknowledges that the Campus/Dixon 257 Project has been reconfigured to include a buffer zone between the proposed residential units and existing agricultural operations, such as the Campbell's Soup Supply Company. While this modification is a positive step, the County remains concerned that the current buffer may still be insufficient to fully mitigate potential land-use conflicts. Issues such as noise, traffic, and air quality could persist, potentially disrupting established agricultural activities. The County recommends a reassessment of the buffer's adequacy to ensure it effectively addresses these concerns.

Additionally, the project proposes to convert prime agricultural land and offers a 1:1 mitigation ratio. While a 1:1 ratio is often utilized for non-prime or grazing lands, a greater ratio should be used for prime lands. The County suggests that the city consider a 2:1 mitigation ratio for any prime agricultural land being converted to non-agricultural uses.

Groundwater Sustainability

While the Solano Sub-basin is generally stable, the Northwest Focus Area, located near the project site, has experienced consistent groundwater level declines over the past two decades. The project's increased groundwater extraction could exacerbate this issue especially under full buildout, potentially affecting local water sustainability and nearby domestic and agricultural wells. The Final Environmental

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 Parks Services
 Water & Natural

 Manager
 Resources Program

 Parks
 Manager

Impact Report lacks a thorough analysis of these localized impacts and does not detail consultations with the Solano Sub-basin Groundwater Sustainability Agency regarding this project's potential effects. As a result, Impact 3.10-2 under CEQA, which states that the Project would not substantially reduce groundwater supplies or interfere with recharge to the extent that it impedes sustainable groundwater management, could be considered significant. This may necessitate further mitigation measures, such as groundwater recharge or seeking out alternative sources of supplemental water.

Please do not hesitate to contact me (<u>jmbezek@solanocounty.com</u>) if you have any questions or require additional information.

Sincerely,

James Bezek, Solano County Director of Resource Management

Cc: Bill Emlen, CAO

JAMES BEZEK Director (707) 784-6765

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Planning Services Division

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July 9, 2024

Mr. Brian Millar Project Planner City of Dixon Community Development Department 600 East A. Street Dixon, CA 95620

RE: Campus Project DEIR Comments

Dear Mr. Millar:

We appreciate the opportunity to provide the following comments on the Draft EIR for The Campus Project (Project).

Solano County previously provided comments on the Dixon Campus project application proposed in the Northeast Quadrant Specific Plan area in three letters dated June 2, 2023 and September 9, 2023 and March 3, 2024.

Impacts to Agricultural Operations and Economy

The County is concerned with the proposed location of commercial, office/business space and residential development, including high-density residential units, in proximity to existing agricultural and associated agricultural supported businesses along Pedrick Road and in the adjacent Industrial-Agricultural Services Area. This includes placing residences across from the Campbell's Soup Supply Company facility (Campbell's), an agricultural processing facility.

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

Residential development is proposed to be located directly along Pedrick Road across from the Campbell's and other critical ag-supported industry facilities. The proposed proximity of residences to an existing agricultural processing facility and support businesses creates a potential conflict. The Illustrative Land Use Plan (Figure 2-7) provided in the DEIR does not provide an adequate ag-urban

SAEED IRAVANI Building Official Building & Safety ALLAN CALDER Program Manager Planning Services Environmental Health SARAH PAPPAKOSTAS Administrative Services Manager MATT TUGGLE Engineering Manager Public Works Engineering MATTHEW HARDY Operations Manager Public Works Operations CHRIS DRAKE MISTY Parks Services Wate Manager Resou Parks N

MISTY KALTREIDER Water & Natural Resources Program Manager buffer, aside from landscaping, between the various uses contemplated in the Project and the agricultural production and agriculturally supporting land uses adjacent to the Project along Pedrick Road.

The March 3, 2024 letter requested the incorporation of a buffer along the Project's Pedrick Road frontage to mitigate potential noise, traffic, air quality, and aesthetic impacts between the existing and proposed opposing land uses. Further, the County requested that the Draft EIR evaluate alternative configurations on the geographic locations of the residential and commercial units within the Project site, ingress and egress points, and buffer space between the residence units and the surrounding agricultural-industrial facilities to mitigate potential conflicts in traffic congestion, noise / nuisance, and other environmental issues at this ag-industrial / Project interface. Based on Figure 2-7, it does not appear that any buffer is being proposed and that land uses have not been reconfigured. The County requests further analysis and discussion of including such a buffer or reconfiguration of land uses to minimize potential noise, air qualify, and traffic related impacts.

Transportation

The development proposes significant changes to the circulation of the area that raises concerns that the transportation impacts as outlined in SECTION 3.15 of the project report are not fully developed and may have significant impacts to local and regional traffic.

Per the EIR, SECTION 3.15—TRANSPORTATION and Mixed-Use Zoning Traffic Impacts

SECTION 3.15—TRANSPORTATION

- **Impact 3.15-1**: The project does not conflict with any program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. *This impact is considered less than significant, and no mitigation is required.*
- **Impact 3.15-2**: The project is potentially inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) concerning Vehicle Miles Traveled (VMT). This is a potentially significant impact, requiring mitigation measures. *However, even with mitigation, the impact remains significant and unavoidable.*
- **Impact 3.15-3**: The project does not substantially increase hazards due to a geometric design feature or incompatible uses. *This impact is considered less than significant, and no mitigation is required.*
- **Impact 3.15-4**: The project would not result in adverse impacts due to construction activities. *This impact is considered less than significant, and no mitigation is required.*
- **Impact 3.15-5**: The project, in combination with other cumulative developments, would be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) regarding VMT. This is a cumulatively considerable and significant impact. *Mitigation measures are required, but the impact remains significant and unavoidable.*
- **Impact 3.15-6**: The project, in combination with other cumulative developments, could substantially increase hazards due to a geometric design feature or incompatible uses. *This impact is considered less than significant, and no mitigation is required.*

Solano County Comments on Mixed-Use Zoning Traffic Impacts

1. Local Traffic Impacts: The higher density housing in the Mixed-Use zoning area will create significant traffic impacts on the County's unincorporated roads due to local service trips

generated by residents of the new development. This aligns with **Impact 3.15-1**, which notes that the project does not conflict with circulation system policies, but the increased local traffic and VMT on unincorporated roads is an overlooked concern. The project proposes to close Vaughn Road which will create congestion and VMT impacts to general circulation in the area. Specific roads that will be minimally impacted include:

- **Pedrick Road**: from the railroad tracks south to Midway Road.
- Vaughn Road: from Pedrick Road to Dixon city limit.
- **Dixon Avenue East**: from Pedrick Road to Dixon city limit.
- 2. Regional Traffic Impacts: The higher density housing will also create significant impacts on the County's unincorporated roads due to regional traffic. As noted in Impact 3.15-2 and Impact 3.15-5, the project is inconsistent with CEQA Guidelines Section 15064.3 regarding VMT, indicating that regional traffic impacts are significant and unavoidable. The congestion on Interstate 80 leads to off-route trips using Solano County roads to reduce travel time. Increased traffic will minimally impact:
 - Currey Road
 - Mace Boulevard
 - Midway Road
 - Pedrick Road
 - Pitt School Road
 - Robben Road
 - o Sievers Road
 - Sparling Lane
 - Tremont Road
 - Vaughn Road

It is highly recommended that the EIR consider further analysis and review with the Napa Solano Activity Based Traffic Model to identify the actual impacts on the County roads. Off-site impacts should include potential improvements needed to potentially mitigate the project impacts.

3. Vehicle Miles Traveled (VMT): The development does not adequately mitigate vehicle miles traveled from trips that generate significant lengths to access services needed to support dense residential development. This concern is validated by Impact 3.15-2 and Impact 3.15-5, which highlight the significant and unavoidable VMT impacts even with mitigation efforts. Road closure and intensive land uses not fully considered within the zoning of this area in the City's General Plan will create greater traffic impacts and VMT. These issues needs more robust mitigation measures to reduce overall environmental impacts.

Proper planning and adjustments are necessary to ensure the long-term success and sustainability of the development.

Groundwater Sustainability

1) The DEIR states on Pg. 3.16-24 that "The City is a participant in the Solano Subbasin Groundwater Sustainability Agency (SSGSA) for the purpose of working collaboratively to

sustainably mange the groundwater basin as required by the Sustainable Groundwater Management Act of 2014 (SGMA).", However, it is not clear whether the City of Dixon has consulted with the Solano Subbasin GSA or solicitated input from the GSA regarding the Dixon Campus project water supply proposal. Similar concerns were noted in an earlier county staff comment letters to the City of Dixon dated June 2 and October 1, 2023 (attached).

- 2) The DEIR has indicated that the technical analyses presented in the Dixon 257 Water Supply Assessment and Study in Appendix H and I, respectively, have shown that the City's projected water supplies are sufficient to meet existing and projected future water demands. However, the analysis only broadly evaluated the sufficiency of the groundwater supply by stating that the Solano Subbasin is not in overdraft and the City does not have a contract that limits its groundwater use (Appendix H, pg. 16). The project does not demonstrate or provide any evidence of how the additional future project demand may impact the sustainability of the Solano Subbasin in the Northwest Focus Area where the proposed new wells will be located. The groundwater levels in this localized area, as designated in the Groundwater Sustainability Plan, have been consistently declining in the last 20 years.
- 3) The DEIR does not address how the future pumping capacity of 14,500 gpm at full buildout as compared to the current pumping capacity of 8,500 gpm may impact or interfere any shallow wells in the vicinity and outside city limits.

Recommendations - The City of Dixon should initiate engagement and coordination with the Solano Subbasin GSA (GSA) to evaluate the level of impacts that may be contributed by the additional groundwater supply and pumping capacity.

Water Quality

This proposed well site for a public water system at full buildout will be located in the vicinity of the historic Dixon Downs / Mistler Farms landfill site and the Dixon Consultation Zone. Further evaluation should be conducted as it appears that the potential for pumping contaminated water for potable use and the exposure to harmful chemicals to the public for health and safety concern have not been considered and addressed in the DEIR. Further details of these concerns for the proposed well may be found in county staff's earlier comment letters dated June 2 and October 1, 2023.

Drainage and Floods

The proposed on-site drainage design for the project is to route all surface runoff to the 255 AF retention basin at the south end of the Campus Project site and proposed to retain project water to reduce impacts to Dixon RCD facilities. However, County staff encourages the City of Dixon not only to develop and implement nature-based drainage and basin design solutions on-site for the project, but also to continue to coordinate and partner with regional drainage agencies to the design of the project drainage system as an integrated regional drainage solution to managing regional floods and water supply issues such as reuse or/and groundwater recharge.

Per the EIR, page ES-33:

Impact 3.10-3: Implementation of the proposed Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; create or contribute runoff water which would exceed the

capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flood flows.

Comments:

- 1) The drainage report shows only post total development drainage outflows. The plan should include reduced outflows and capture for all phases of development.
 - a. Development in phases may increase rates of runoff unless drainage system is built first.
- 2) Figure 2-10 (Proposed NEQSP Drainage System) is too vague and does not provide drainage specificity for the development:
 - a. Areas with the highest impervious development will create increased stormwater runoff.
 - b. Show post development pipe sizes for each SD and the drainage sheds that each pipe manages.
- 3) Discrepancy between the map provided for this draft report and the map provided for the previous draft reports; it seems that the prior drainage plan had more variance in stormwater mitigation systems with the combination of channels, swales, and pipes.
- 4) What is the maintenance plan for the drainage system? Possible concern due to only four SD pipes and one main drainage pipe to available to intake the increase of post development stormwater. Without any redundancy, failure of any pipe/drain may impact the adjacent properties within County jurisdiction.

Closed Landfill

The Solano County Local Enforcement Agency (LEA) for the regulation of solid waste has reviewed the DEIR. In earlier comments submitted to the City of Dixon, the LEA expressed concerns with how the abandoned closed landfill mitigation area and prohibitions would be handled during the development of the project, especially during the earthwork phase of the project and then once the project is occupied by the public and businesses.

The LEA understands that the restricted area will be not be divided into separate parcels but rather remain as one parcel owned by the City. The use of the restricted area will be a dog park, and a walking path including decorative plants, trees and sidewalks. However, the LEA still has concerns on how the area will be handled during the construction of The Campus and the long-term post construction maintenance of the area. The environmental hazards presented by the closed landfill have not been analyzed sufficiently in the DEIR, nor have they been characterized accurately.

For example, in section 3.9.1 of the DEIR 3.9.1 Environmental Setting "A Post Excavation Soil Gas Survey (Phase II ESA) was also prepared; refer to Appendix J. The Phase II ESA included background information regarding the property and the landfill clean closure process a description of the post excavation soil gas sampling activities; laboratory data; and a discussion regarding results." For clarification, the State of California Water Board is the agency with authority to determine the property is "Clean Closed" under the meaning of the appropriate statute.

To date this site is not officially "Clean Closed" with documentation of such by the California State Water Board. Instead, the LEA required the site to go through the process described in the regulations to assist in assessing the risks.

1) Potential risks during implementation of project are not fully analyzed, as construction can cause the release of VOCs present in the soil, as well as encountering contaminated soil.

On p. 297, the following is noted: "the Phase II ESA notes that it may be possible to allow for some construction in the area of the closed landfill with deed restricted areas provided that agency approved vapor intrusion mitigation measures (such as properly designed vapor barriers and venting systems) are implemented." Therefore, Impact 3.9.1 is deemed less than significant. This seems to make the analysis internally inconsistent, as vapor mitigations that the LEA will require in order to approve any construction adjacent and/or near the closed landfill boundaries. Moreover, the potential hazards of VOC exposure to the workers who will be constructing the site and employing these mitigation measures is not analyzed, nor is the possibility of encountering and needing to dispose of contaminated soil other than to recognize the deed restriction requirements. The DEIR should be revised to evaluate these risks properly.

2) Inherent risks of development at the site, especially around and adjacent to the closed landfill, are not fully analyzed

The analysis of the impacts of development as less than significant (Impact 3.9-3) is based entirely on the fact that the site is not listed under Government Code section 65962.5. Again, this analysis incorporates the deed restriction requirements for removal of hazardous soils. Moreover, the analysis of gas sampling minimizes the presence of VOCs and concludes that gas sampling in deeper levels is of no concern to future vapor intrusion risks. (p. 296.) The less than significant determination does not appear to consider a future potential for migration of deep landfill gases such as methane gas to migrate to the upper soil layers in this area and potentially release gasses through the soil into the atmosphere. The DEIR should be revised to evaluate the risks of the presence of gas more carefully, including whether additional monitoring should occur in the future as development progresses and how the Project will meet other post closure land use regulations.

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

Sincerely,

James Bezek, Solano County Director of Resource Management

Cc: Bill Emlen, CAO

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March 12, 2024

Mr. Brian Millar Project Planner City of Dixon Community Development Department 600 East A. Street Dixon, CA 95620

RE: Planning Commission public study session for the Campus Project

Dear Mr. Millar:

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

- An approximately 48-acre mixed-use development with up to 650,000 square feet of research and development uses, known as the Dixon Opportunity Center (DOC) comprised of Light industrial uses, a Tech-Campus, and a business park; and
- Approximately 144 acres of residential uses to include 1,041 units of varying densities; and
- Approximately 2.5 acres of commercial uses.

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

Solano County previously provided comments on the Dixon 257 project application proposed in the Northeast Quadrant Specific Plan area in two letters dated June 2, 2023 and September 9, 2023 which are attached. Many of the comments in the June 2nd and the September 9th letter pertain to this Project in terms of the plan for the area and general county comments about the proposed project. Specifically, the County is concerned with the proposed location of commercial, office/business space and residential development, including high-density residential units, in proximity to existing agricultural and associated agricultural supported businesses along Pedrick Road and in the adjacent Industrial-Agricultural Services Area. This includes placing residences across from the Campbell's Soup Supply Company facility (Campbell's), an agricultural processing facility. The County recommends reconfiguration of the Project's land plan and consideration of a more substantive spatial buffer within City limits to mitigate potential conflict between the Project and the County's Industrial-Agricultural

SAEED IRAVANI Building Official Building & Safety ALLAN CALDER Program Manager Planning Services Environmental Health SARAH PAPPAKOSTAS Administrative Services Manager MATT TUGGLE Engineering Manager Public Works Engineering MATTHEW HARDY Operations Manager Public Works Operations CHRIS DRAKE Parks Services Manager Parks Manager Manager

MISTY KALTREIDER Water & Natural Resources Program Manager Service Area and other nearby agricultural businesses and uses. Other concerns regarding noise, traffic, water, sewer, and drainage remain relevant in the preparation of CEQA document. These fundamental suggestions and others are highlighted below and emphasize the need for specific environmental resources to be analyzed in the DEIR for potentially significant impacts associated with the implementation of the Project.

Impacts to Agricultural Operations and Economy

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

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

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

Regional Traffic Impacts

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

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

Water Facilities & Groundwater Quality & Quantity

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

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

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

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

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

Closed Landfill

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

Compounds of concern) remain from 4 ft to 14 ft below ground. The LEA understands that the restricted area will be developed into roadways, a sidewalk with tree and shrub landscape and will be dedicated to the City with no intention of splitting the restricted area into several parcels. Public use is not intended for the restricted area and no buildings will be built within the restricted area.

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

Drainage/Stormwater Control Basin location & Consider Groundwater Recharge

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

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

Integrated "One Water" Multi-benefit Opportunities and Alternatives

The Project proposes sewer, water, and drainage improvements in areas immediately adjacent to the County's existing I-AS area that contains existing agricultural support facilities, including Campbell's. These existing ag-service industries utilize individual wastewater collection and disposal systems, water supply wells, and on-site drainage facilities. The County Board of Supervisors held a priority setting session on April 18, 2023 that identified the need for a countywide One Water master utility study to help support economic development and agricultural development and preservation. Provision of community sewer, water, and drainage services could be beneficial for existing businesses and allow further development of agricultural support industry in this zoning district. Opportunity exists for the City and County to evaluate potential partnerships that may be beneficial to both entities to determine and provide the infrastructure needs more efficiently throughout the area to further promote economic development with a One Water mindset. It is recommended that various alternatives should be explored and considered in the DEIR in relation to water and

wastewater infrastructure planning and design with a regional and integrated One Water approach.

Aesthetics

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

Airport Land Use Commission Review required

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

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

Sincerely,

James Bezek, Solano County Director of Resource Management

- **Cc:** John Vasquez, Solano County Board of Supervisors District 2 Bill Emlen, CAO City of Dixon Planning Commissioners
- Attachment: June 2, 2023 and September 9th Solano County Department of Resource Management comment letters (both incorporated by reference)

TERRY SCHMIDTBAUER Director tschmidtbauer@solanocounty.com

JAMES BEZEK Assistant Director jmbezek@solanocounty.com **DEPARTMENT OF RESOURCE MANAGEMENT**



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September 29, 2023

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

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

Dear Mr. Boloyan:

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

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

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

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

SAEED IRAVANI Building Official Building & Safety ALLAN CALDEREDMOND STRICKLANDProgram ManagerManagerPlanning ServicesEnvironmental Health

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CHRIS DRAKE Parks Services Manager Parks Manager Dixon Commons Project Solano County Comments September 29, 2023 Page 2

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

Impacts to Agricultural Operations and Economy

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

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

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

Regional Traffic Impacts

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

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

Water Facilities & Groundwater Quality & Quantity

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

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

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

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

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

Closed Landfill

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

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

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

Drainage/Stormwater Control Basin location & Consider Groundwater Recharge

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

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

Integrated "One Water" Multi-benefit Opportunities and Alternatives

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

Dixon Commons Project Solano County Comments September 29, 2023 Page 5

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

Aesthetics

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

Airport Land Use Commission Review required

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

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

Sincerely,

Terry Schmidtbauer, Solano County Director of Resource Management

Cc: Bill Emlen, CAO

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

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June 2, 2023

Brian Millar bmillar@cityofdixon.us 530.902.9218

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

Mr. Millar,

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

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

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

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

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CHRIS DRAKE MISTY KALTREIDER Parks Services Water & Natural Manager **Resources Program** Parks Manager

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

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

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

Recommendations:

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

Creation of Nuisances

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

Recommendations:

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

Regional traffic impacts

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

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

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

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

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

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

Development is proposed in Close Proximity to a Closed Landfill:

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

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

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

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

Recommendation:

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

Groundwater and Water Supply:

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

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

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

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

The provided application materials do not contain approval of a Preliminary Technical Report (PTR), or any documentation from DDW, which indicates that they have approved the siting of a PWS water well in this location, nor expansion of the existing City of Dixon Public Water System CA4810009. Additionally, the Water Study proposes a single 12-inch diameter point of connection from the existing Dixon water infrastructure, on Vaughn Road, to the project area. The Water Study acknowledges that this contrasts with the four points of connection proposed under the existing City of Dixon Water System Master Plan (WSMP). SCEH highly recommends multiple points of connection between the existing water infrastructure and the proposed development water infrastructure to allow for easier repair and maintenance and provides system redundancy in case of an emergency or damage to the system.

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

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

Recommendation:

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

Sewer

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

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

Recommendation:

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

Drainage

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

Recommendation:

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

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

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

Sincerely,

Terry Schmidtbauer

Terry Schmidtbauer Director of Resource Management

Hello!

I am submitting a question for the commission for the special meeting tonight. Regarding the proposed project what inquiry and planning has been done for the need to expand city resources to the proposed project? Reviewing information from last night, city Council meeting, specifically the information shared during the midyear budget report regarding new increases on resource utilization/town finances in the newer home developments, specifically related to streets, utilities, street lamps, et cetera.

Also while some of this project is very welcome, what about the farmland being lost? What weight is the committee considering that in the decision regarding long term/short term benefits and limits when it comes to that? Is building always the answer when we still have projects within city limits coming to fruition?

As a community member newer to this conversation and continuing/open to learning more, the care in considering the above is greatly appreciated.

Thank you, Alex Lopez