

MEMORANDUM

DATE February 27, 2015
TO Vacaville City Council
FROM Joanna Jansen and Tanya Sundberg
SUBJECT Additional analysis for changes to Draft General Plan land use designations and policies (SCH #2011022043)

This memo analyzes the potential environmental impacts of changes to the land use designations and policies in the October 25, 2013 Draft General Plan that have not already been described and analyzed in the Final EIR published on June 12, 2014, and considers whether the EIR prepared on the Draft General Plan (SCH #2011022043) is adequate to cover the proposed changes or whether there is significant new information requiring recirculation pursuant to Section 15088.5 of the CEQA Guidelines.

The Planning Commission held three hearings on the Draft General Plan and ECAS (August 5, August 18, and September, 22, 2014) and recommended several revisions be incorporated into the final plan documents (see Compilation of Comments document & Addendum to Compilation of Comments). At their meeting of January 13, 2015, the City Council provided direction to City staff regarding additional final revisions to incorporate into the General Plan to reflect the results of the public testimony and City Council deliberations on the Plan.

Pursuant to Section 15088.5 of the CEQA Guidelines, new information, including changes to the project or additional data or analysis, may be added to an EIR. Unless the new information is significant, recirculation of the EIR is not required. New information is not significant unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental impact or a feasible way to mitigate or avoid such an impact.

The proposed changes to the General Plan and ECAS are added in order to reflect the final recommendations from the Planning Commission and direction from the City Council following public testimony. The following analysis addresses these changes to the project. No new significant adverse impacts are identified and no previously identified significant effects are determined to experience a substantial increase in the severity of the effect. Based upon this analysis of proposed revisions to the final project description, recirculation of the EIR is not required.

These changes are described in detail below.

General Plan Land Use Designation Changes

EAST OF LEISURE TOWN ROAD GROWTH AREA

The majority of the General Plan land use designation changes are in the East of Leisure Town Road (ELTR) Growth Area. The General Plan land use designations that were published in the October 25, 2013 Draft General Plan, and evaluated in the EIR, are shown in Figure 1; the revised land use designations as directed by the City Council at its October 28, 2014 and January 13, 2015 meetings are shown in Figure 2. Table 1 summarizes the change in acreage of each land use designation, and Table 2 summarizes the change in full buildout and 2035 development projections. As shown in Tables 1 and 2, the changes to the land use designations in the ELTR Growth Area would reduce the capacity for development.

The buildout estimates reported in Table 2 rely on the same methodology that is described on pages 3-35 to 3-36 of the Draft EIR, with the following adjustments:

- » The residential area south of the Brighton Landing Specific Plan area is assumed to develop in accordance with preliminary plans by the developer of this area, including a total of 785 units. Similar to the approach from the Draft EIR of using development information from the Jepson Ranch Group, the detailed planning from this developer indicates the level of development that is likely to occur based on the proposed land uses allowed in the General Plan. In addition, the proposed Policy LU-17.1, described in the *General Plan Policy Changes* section below, would limit development in this area to 785 units.
- » Because the revised land use diagram includes different configurations of residential land use designations in the area north of Elmira Road, the acreage data provided by the Jepson Ranch Group (as described on page 3-36 of the Draft EIR) is no longer applicable. Therefore, the total acreage of each residential site was reduced by approximately 75 percent to account for environmental constraints, such as Alamo Creek, and rights-of-way. This results in 610 total units north of Elmira Road. The proposed Policy LU-17.1, described in the *General Plan Policy Changes* section below, limits development in this area to 610 units.

As shown in Table 2, the full residential buildout of the revised ELTR Growth Area map would be significantly less than that of the October 2013 version of this map, and slightly less than the amount that was anticipated to occur by the General Plan horizon year of 2035. Therefore, it is assumed that all of the residential development potential under the revised map would occur by 2035. In total, the land use changes in the ELTR Growth Area would slightly reduce the total number of units anticipated to be constructed citywide by 2035. Specifically, the Draft EIR assumed that 9,677 units would be constructed throughout the city by 2035; with the revised map for the ELTR Growth Area, projected 2035 units would reduce to 9,511, an approximately 2-percent reduction.

Similarly, the full commercial buildout of the revised ELTR Growth Area map would be significantly less than that of the October 2013 version of this map. There are three sites with commercial development potential in the revised map: two Neighborhood Commercial sites along Leisure Town Road and one Commercial Service site along the railroad tracks. It is assumed that the two sites along Leisure Town Road would develop by 2035, but that the Commercial Service site would not redevelop

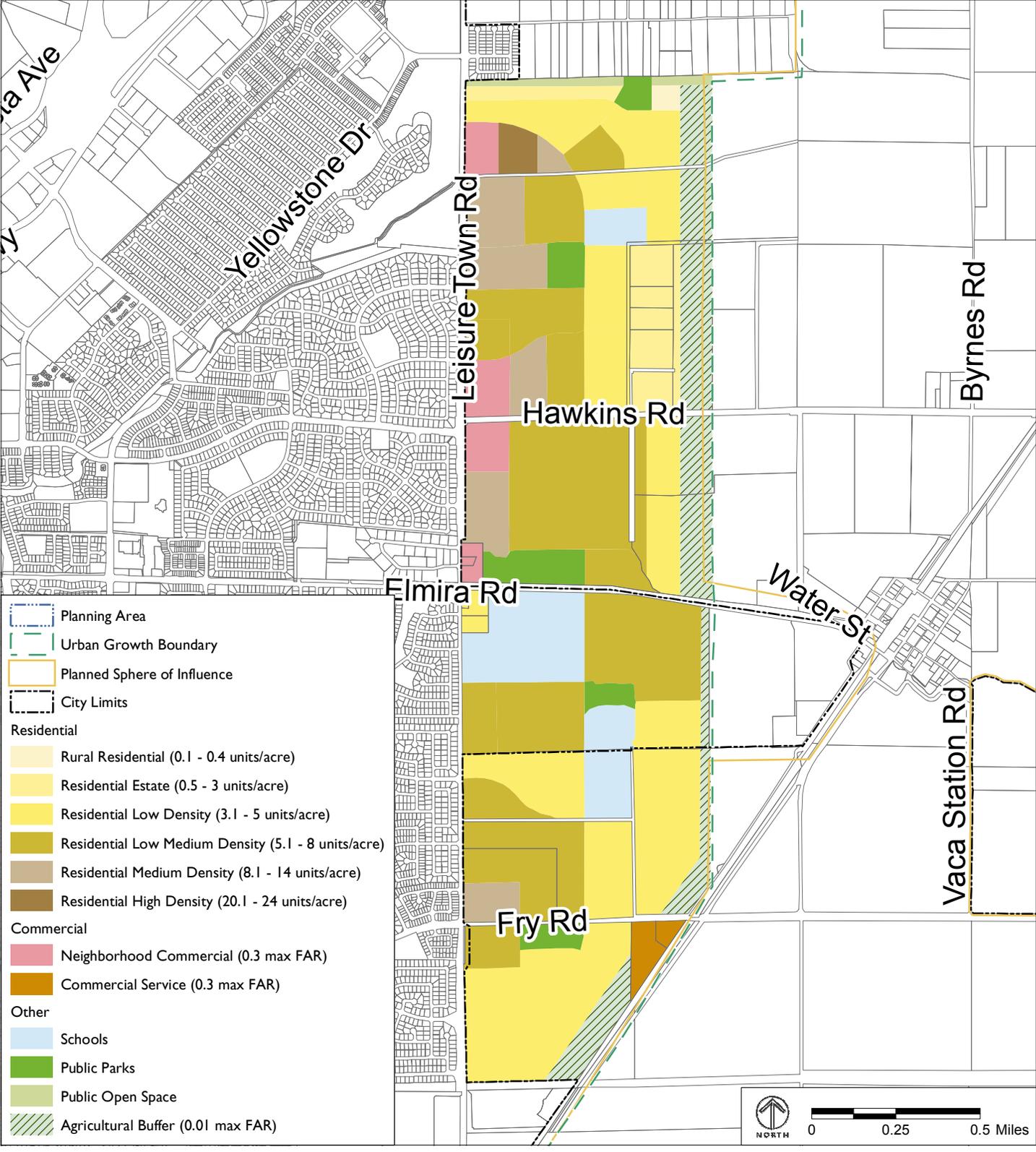


FIGURE 1

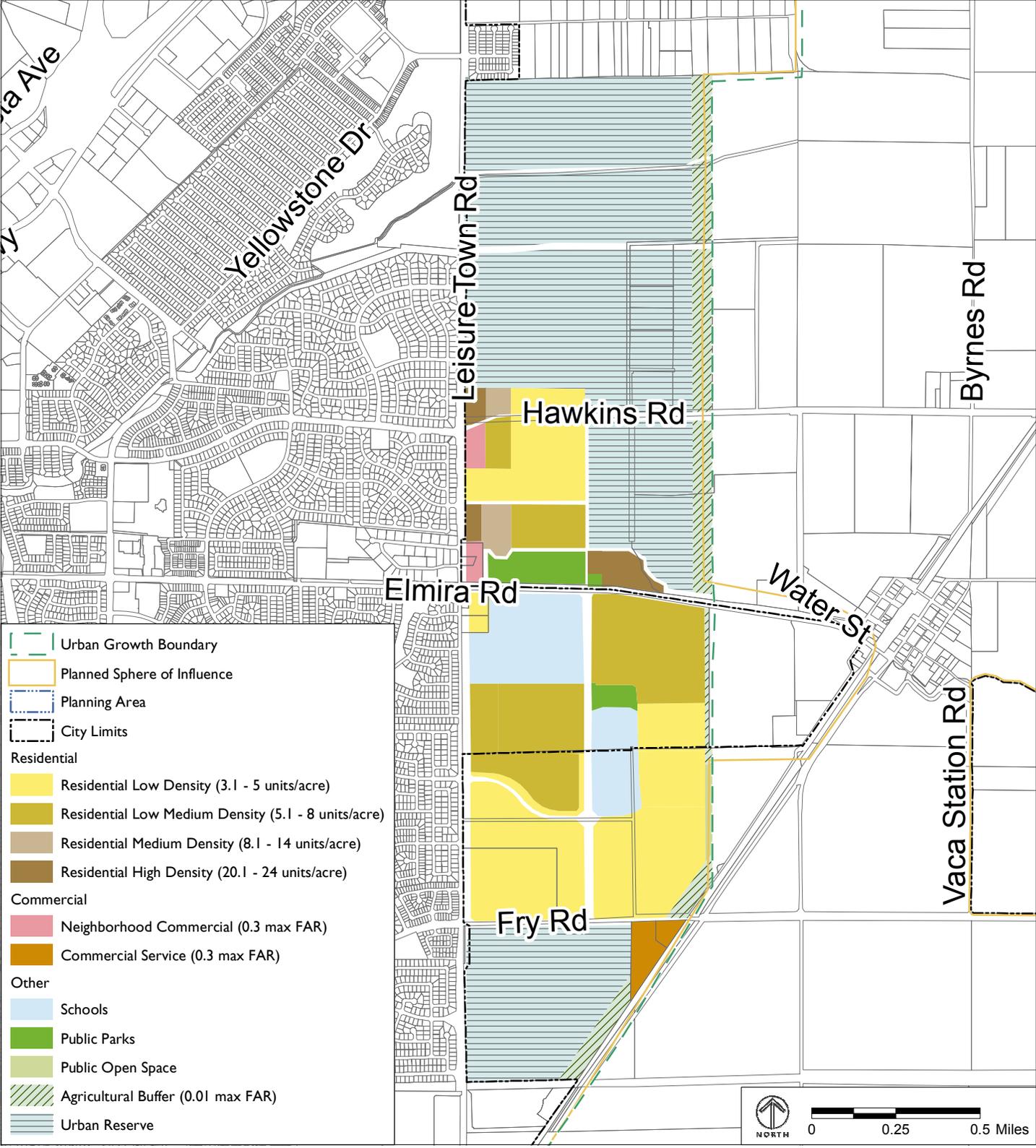


FIGURE 2
 REVISED GENERAL PLAN LAND USE DESIGNATIONS IN THE EAST OF LEISURE TOWN ROAD GROWTH AREA

TABLE 1 ACREAGE OF LAND USE DESIGNATIONS IN THE ELTR GROWTH AREA

LAND USE DESIGNATION	ACRES		
	10/25/13 DRAFT GENERAL PLAN	PROPOSED REVISION	DIFFERENCE
Rural Residential	4	0	-4
Residential Estate	58	0	-58
Residential Low Density	384	240	-144
Residential Low Medium Density	392	155	-237
Residential Medium Density	94	12	-82
Residential High Density	10	19	+9
Total Residential	942	426	-516
Neighborhood Commercial	41	9	-32
Commercial Service	12	12	0
Schools	100	81	-19
Public Parks	50	24	-26
Public Open Space	10	4	-6
Agriculture Buffer	131	76	-55
Total Non-Residential Acres	344	206	-138
Urban Reserve	0	607	+607
Rights of Way*	47	0	-47
Total Acres	1,286	1,239	

* Note: The revised land use diagram excludes major rights-of-way, resulting in a reduced total acreage.

TABLE 2 DEVELOPMENT PROJECTIONS IN THE ELTR GROWTH AREA

DEVELOPMENT TYPE	FULL BUILDOUT			HORIZON (2035)		
	10/25/13 DRAFT EIR	PROPOSED REVISION	DIFFERENCE	10/25/13 DRAFT EIR	PROPOSED REVISION	DIFFERENCE
Units	4,682	2,175	-2,507	2,341	2,175	-166
Commercial square feet	624,650	247,236	-350,414	156,163	111,329*	-44,834

* Note: The difference in commercial square footage between full buildout and horizon year (2035) development under the revised diagram (135,907 square feet) is due to the Commercial Service site located along the railroad tracks in the southern portion of the growth area. As noted in the text above, it was assumed that the Commercial Service site would not redevelop by 2035 due to its relatively remote location and the existing commercial development on this site.

by 2035 due to its relatively remote location and the existing commercial development on this site. This is consistent with the development assumptions from the Draft EIR.

Because there are no land use map changes outside the ELTR Growth Area that would increase development capacity, total citywide potential development under both the full buildout and 2035 development scenarios would be reduced by the amounts described above.

NORTHEAST GROWTH AREA

In response to a comment letter from a property owner in the Northeast Growth Area, City staff recommends revising the land use designations on a parcel located at the southwest corner of Weber Road and Byrnes Road (APN 141-010-040) in the Northeast Growth Area. At their August 5, 2014 meeting, the Planning Commission agreed with staff's recommendation. The General Plan land use designations for this parcel that were published in the October 25, 2013 Draft General Plan, and evaluated in the Draft EIR, are shown in Figure 3; the proposed revised land use designations are shown in Figure 4. Table 3 summarizes the changes in acreages of each land use designation, and Table 4 summarizes the change in full buildout. This parcel was not expected to develop by 2035. For this reason, it was not included in the horizon-year development projection analyzed in the Draft EIR; similarly, it is not included in the horizon-year development projection for the proposed revision to the land use diagram.

TABLE 3 ACREAGE OF LAND USE DESIGNATIONS ON APN 141-010-040

LAND USE DESIGNATION	ACRES	
	10/25/13 DRAFT GENERAL PLAN	PROPOSED REVISION
	Residential High Density	15
Business Park	4	0
Highway Commercial	4	11
Total Acres	23	23

TABLE 4 DEVELOPMENT PROJECTIONS ON APN 141-010-040

DEVELOPMENT TYPE	FULL BUILDOUT	
	10/25/13 DRAFT EIR	PROPOSED REVISION
Units	300	231
Commercial square feet	43,124	147,107
Industrial square feet	69,696	0

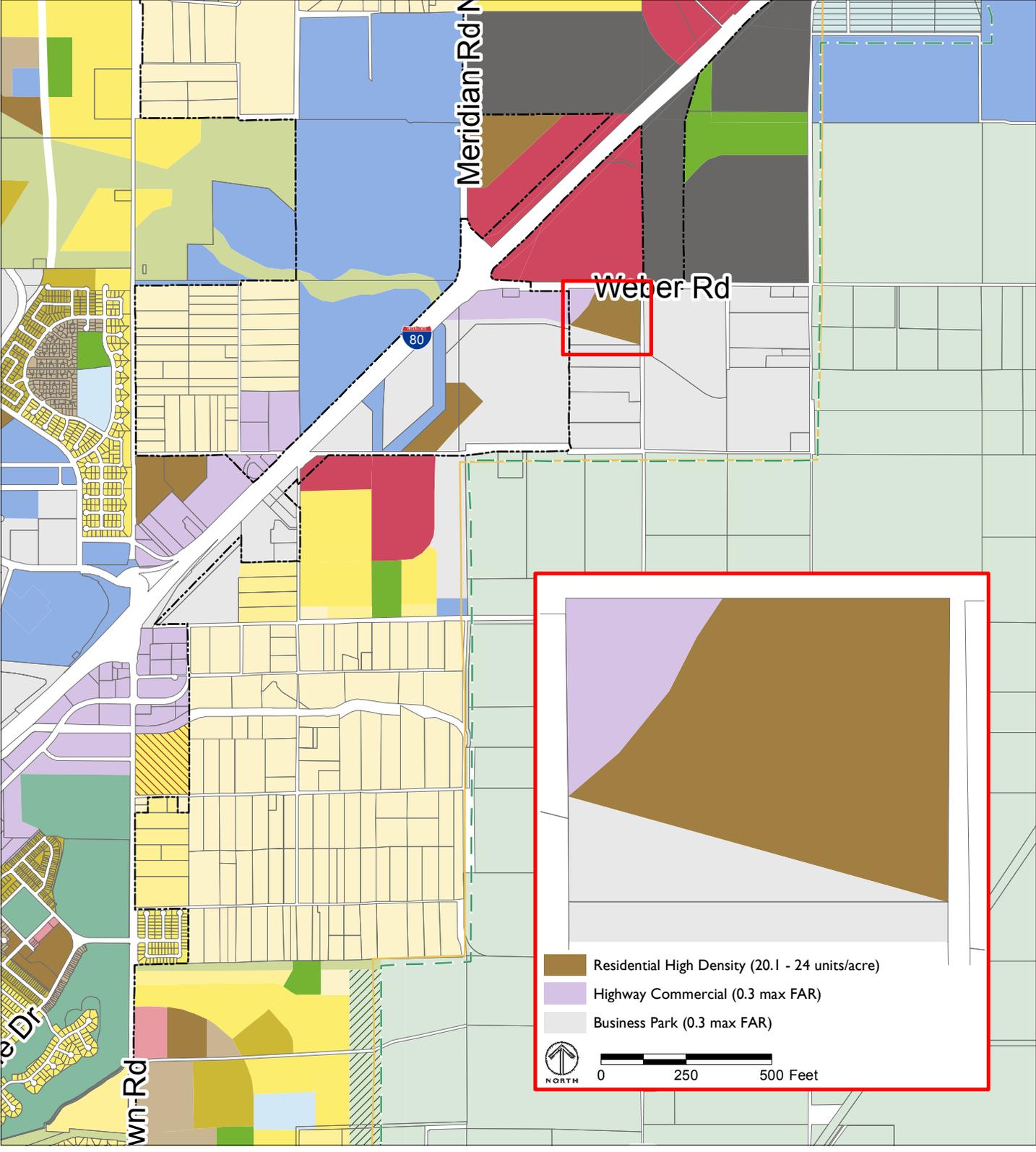


FIGURE 3

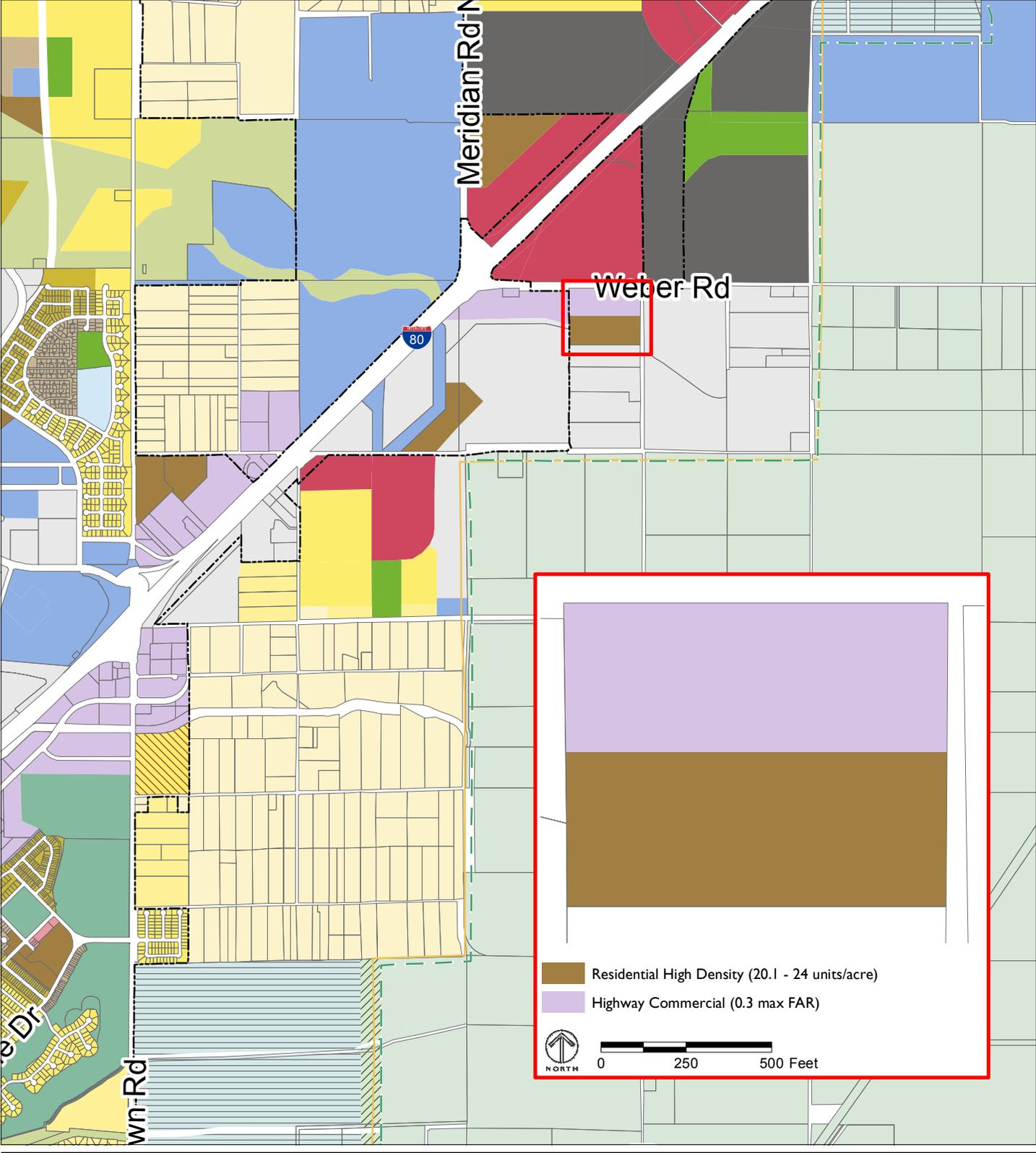


FIGURE 4
REVISED GENERAL PLAN LAND USE DESIGNATIONS ON APN 141-010-040

General Plan Policy Changes

This section discusses the proposed policy changes. The policies are grouped below based on their relationship to the General Plan land use diagram. General Plan land use map policies are being added to accompany revisions to the New Growth Area maps, based on City Council direction. Additions are underlined; deletions are stricken. As noted in the introduction, this memo considers the potential environmental impacts of changes to the policies in the October 25, 2013 Draft General Plan that have not already been described and analyzed in the Final EIR published on June 12, 2014. Some of the policy revisions shown in the revised Draft General Plan were already considered in the Final EIR and are not repeated here.

GENERAL PLAN LAND USE MAP POLICIES

- » Policy LU-P17.1: Limit residential development within the East of Leisure Town Road Growth Area to 2,175 dwelling units with the following general assumptions:
 - Brighton Landing Specific Plan Area: 780 dwelling units
 - Properties South of Brighton Landing and North of Fry Road: 785 dwelling units
 - Properties North of Elmira Road: 610 dwelling unitsRequire a General Plan Amendment for residential development in excess of this amount.
- » Policy LU-P17.3: When considering specific plan proposals for development on lands designated Residential High Density in the East of Leisure Town Road Growth Area, ensure that overall development in the East of Leisure Town Road Growth Area is on track to provide at least 13 percent of the total residential units as attached, multi-family units.
- » Policy LU-P17.4: Approximately 80 percent of the 610 units permitted for the properties located within the East of Leisure Town Road Growth Area, north of Elmira Road, shall be distributed between Elmira Road and Hawkins Road, west of the future north-south collector street; the remaining 20 percent shall be located north of Hawkins Road, west of the future north-south collector street.
- » Policy LU-P18.2: Properties within the Northeast Growth Area designated as Technology Park and measuring over 100 acres in size are intended for large technology and business campuses. These properties shall not be subdivided into smaller parcels for the purpose of developing several unrelated uses.
- » Policy LU-P19.1: Require a General Plan amendment to convert lands designated as Urban Reserve to other land use designations. Require all conversions to make the findings identified in an Urban Reserve Ordinance described in Action LU-A19.1, below.
- » Policy LU-P19.4: Evaluate General Plan amendment requests to convert lands designated as Urban Reserve to other land use designations no more often than every 5 years. Applications to amend the General Plan to convert Urban Reserve lands must be consistent with the City's Municipal Service Review and Comprehensive Annexation Plan.
- » Action LU-A19.1: Amend the Land Use and Development Code to establish an Urban Reserve ordinance. The ordinance shall include criteria necessary to support a General Plan amendment

permitting the conversion of the land designated as Urban Reserve to another land use designation. These findings shall support the General Plan Vision Statement.

NON-MAP POLICIES

- » Policy LU-A3.3: Provide urban services in accordance with the May 1995 City of Vacaville/Solano Irrigation District Master Water Agreement, ~~provide urban services only to development within the Urban Service Area Boundary, which is shown in Figure LU-3 as it may be amended from time to time.~~
- » Action LU-A3.6: Develop a focused infrastructure investment plan to service employment sites.
- » Action LU-A4.1: Update and maintain the Economic Vitality Strategy to address the community's targeted goals for attracting targeted employment uses to the city, including incentives to attract those uses to the city.
- » Policy LU-P5.2: Lands East of Leisure Town Road: In conjunction with approval of any new urban development on lands shown as "Area B" on Figure LU-3, which consists of lands that are inside the Urban Growth Boundary but east of Leisure Town Road and between the Locke Paddon Community areas on the north and New Alamo Creek on the south, the City shall require such development to mitigate its impact on agricultural and open space lands by preserving, to the extent consistent with applicable law, for each acre of land developed, at least 1 acre of land outside the Urban Growth Boundary but within Pleasants Valley, Upper Lagoon Valley, or Vaca Valley, or any other location that is within 1 mile of the Urban Growth Boundary. Alternatively, to the extent consistent with applicable law, such development may pay an equivalent in-lieu fee as determined by the City in consultation with the Solano Land Trust. Lands acquired directly or with fees collected pursuant to this requirement shall first be offered to the Solano Land Trust. Any such fees transferred to the Solano Land Trust may only be used to acquire or protect lands outside of the Urban Growth Boundary but within 1 mile of the Urban Growth Boundary, or within Pleasants Valley, Upper Lagoon Valley, or Vaca Valley. Acquisitions pursuant to this requirement shall be coordinated with the Solano Land Trust.
If for any reason adequate land to meet the conservation goals described in the Vacaville General Plan, and in particular this section, cannot be identified or acquired, the City and the Solano Land Trust, or if the Solano Land Trust declines to participate, the City and another land conservation entity shall meet and confer to identify other areas where conservation acquisitions can occur at a reasonable cost and to satisfy the conservation goals described in this section.
- » Action LU-A6.3: Evaluate competitive cost comparisons to target efforts that assist specific businesses in a way that maximizes benefits for the City. Study impact fees and fiscal impacts as an integral part of economic development planning.
- » Action LU-A7.1: Develop online information pages for specific neighborhood areas to provide ongoing information to residents regarding the status of development in their neighborhoods.
- » Policy LU-P8.7: Work with Solano County to coordinate and support the County's efforts to promote agri-tourism and related uses.

- » Action LU-A9.5: Work with the local Farmers Market Association and agricultural producers to identify appropriate locations for farmers markets or local produce stands outside of Downtown Vacaville during ~~the~~ weekdays.
- » Action LU-A13.3: Revise the Land Use and Development Code to define competing neighborhood commercial uses, and to outline the development review process applicable to addressing development proposals including competing land uses and appropriate siting standards.
- » Action LUA15.2: Compile information and/or maps to assist new development in identifying infrastructure availability and assist in economic development efforts for City capital improvement planning.
- » Policy LU-P16.9: Allow retention and rehabilitation of the traditional single-family homes on the east side of Vine Street, south of Vineyard Valley Way. Due to the topography of these lots, these lots may be redeveloped with single-family homes within the legally established setbacks of the original homes without the need of an approved planned development permit.
- » Action LU-A16.5: Amend the zoning designations within the Downtown to conform to revised land use designations.
- » Action LU-A16.6: Prepare a Downtown Specific Plan to provide development standards that will promote the development of the City's central commercial core and implement policies for the commercial, mixed-use, and employment uses promoted under Goal LU-16.
- » Policy LU-P17.2: The East of Leisure Town Road Growth Area shall include a mixture of housing densities, and attached and detached housing types consistent with the adopted land use diagram.
- » Policy LU-P17.5: Require that specific plans be prepared for development in the East of Leisure Town Road ~~and Northeast~~ Growth Areas to ensure that coordinated plans for land uses, public facilities, and public services are created for each-such area, and require that these specific plans are consistent with the City's updated infrastructure master plans that account for development in the East of Leisure Town Road gGrowth aAreas.
- » Policy LU-P17.6: Require that specific plans for the East of Leisure Town Road ~~and Northeast~~ Growth Areas include a diagram showing the distribution of land uses and define permitted and conditionally permitted land uses, major public facilities (including schools, parks, roads, ~~and~~ water, sewer, and drainage facilities), phasing, infrastructure financing mechanisms, interim fire protection measures, and any other elements that may be needed to ensure an orderly development process with minimal adverse impacts to the existing community. The specific plans shall be consistent with the City's master infrastructure plans prepared for the East of Leisure Town Road Growth Area.
- » Policy LU-P17.9: Require residential specific plans within the East of Leisure Town Road Growth Area to contain a component of housing designed to attract business executives and professionals.
- » Policy LU-P17.10: Require specific plans within the East of Leisure Town Road Growth Area to incorporate detention basins, agricultural buffer areas, and public open spaces into the physical amenities designed into the neighborhoods. These amenities could include trails, passive open spaces, recreational spaces, or other features designed to create innovative, attractive neighborhood design.

- » Policy LU-P17.11: Development projects within the East of Leisure Town Road Growth Area shall coordinate their respective roads, bike paths, landscape corridors, and design standards to create a unified sense of place and identity.
- » Policy LU-A17.1: Reduce the width of the agricultural buffer located north of Elmira Road from 500 feet to 300 feet. A 300-foot-wide agricultural buffer is consistent with the Solano County General Plan policy that identifies the requirement for 300-foot-wide agricultural buffers. Further discussions with the Solano Irrigation District are required as part of this action, and will be addressed in an amendment to the Master Water Agreement. In the event that the City and the Solano County Irrigation District do not agree to such amendment, the buffer shall remain 500 feet in width.
- » Action LU-A17.2: Work with the Solano Irrigation District to expand the Urban Service Area and amend the Master Water Agreement to accommodate urban development in the East of Leisure Town Road ~~and Northeast~~ Growth Areas. As part of the ~~Aa~~ amendment to the Master Water Agreement, consider the width, location, and allowed uses in the agricultural buffer.
- » Policy LU-P18.1: The Northeast Growth Area shall primarily be developed with job generating uses such as high quality offices, industrial uses, and technology campuses. Encourage the development of employment generating uses prior to residential uses in the Northeast Growth Area.
- » Policy LU-P18.3: Require that specific plans be prepared for development in the Northeast Growth Area to ensure that coordinated plans for land uses, public facilities, and public services are created for each area, and require that these specific plans are consistent with the City's updated infrastructure master plans that account for development in the Northeast Growth Area.
- » Policy LU-P18.4: Require that specific plans for the Northeast Growth Area include a diagram showing the distribution of land uses and define permitted and conditionally permitted land uses, major public facilities (including schools, parks, roads, water, sewer, and drainage facilities), phasing, infrastructure financing mechanisms, interim fire protection measures, and any other elements that may be needed to ensure an orderly development process with minimal adverse impacts to the existing community.
- » Policy LU-P18.5: One comprehensive infrastructure master plan shall be prepared for the Northeast Growth Area prior to development in this area to ensure coordinated planning for infrastructure, public facilities, and public services.
- » Policy LU-P19.2: Prioritize development of residential land use in the East of Leisure Town Road Growth Area over future new residential uses in the Northeast Growth Area in the City's infrastructure planning and land use approval process.
- » Policy LU-P19.3: Identify all properties designated as Urban Reserve as long-term annexation areas in the City's Municipal Service Review and Comprehensive Annexation Area Plan. Long-term annexation areas are areas that will not be annexed to the City within the 5-year planning period of the most current Municipal Service Review and Comprehensive Annexation Plan.
- » Policy LU-P19.5: Prior to the approval of any subdivision applications in the East of Leisure Town Road or Northeast Growth Area, the developers shall assure that all required domestic water supply and distribution systems, wastewater collection and treatment facilities, stormwater management

- facilities, and roadway segment and intersection improvements will be incorporated into the final project plans.
- » Action LU-A19.3: As part of its regular Municipal Service Review and Comprehensive Annexation Plan updates, the City shall review and analyze the growth and population projections for the East of Leisure Town Road and Northeast Growth Areas in relation to the rest of the city to ensure an adequate, long-term supply of developable residential and non-residential land, and to ensure the City can provide adequate infrastructure and facilities to serve the needs of these growth areas.
 - » Policy LU-P27.7: Notwithstanding other provisions of the General Plan, land use changes and development approvals within the Vacaville Planning Area shall be consistent with the Nut Tree Airport and Travis Air Force Base Airport Land Use Compatibility Plans (ALUCP).
 - » Policy TR-P4.7: Require specific plans in new growth areas to include planning for future public transit service to these areas by considering the addition of future transit stops and route connections as part of the public transportation system.
 - » Policy COS-P1.3: Protect the existing wildlife movement corridors within the designated Vacaville-Fairfield Greenbelt area and create new wildlife corridors, including creek corridors and utility easements, where feasible, to enable free movement of animals, to minimize wildlife-urban conflicts, and to establish open space linkages.
 - » Action COS-A1.4: Amend the Land Use and Development Code to require all new specific plans, and the Residential Design Requirements for New Single-Family Development to include a resource management component that protects and preserves natural communities, encourages the use of native drought-resistant California vegetation in landscape plans, and establishes street tree planting standards for new development.
 - » Action COS-A1.5: Adopt a citywide open space management plan that identifies ways to protect wildlife, including the protection and enhancement of existing wildlife movement corridors.
 - » Action PR-A3.1: Coordinate with public safety staff in the design of parks and in the development of standards for park design. Incorporate these standards into the Update to the City's Comprehensive Parks, Recreation, and Open Space Master Plan.

Environmental Analysis

This section assesses the potential impacts of the proposed land use changes above described proposed land use changes and whether such impacts are addressed or analyzed in the Draft EIR. In general, the potential impacts of the proposed land use changes will be less due to the reduction in development potential in the ELTR Growth Area. Unless otherwise noted below, impacts associated with development on APN 141-010-040 in the Northeast Growth Area would not change because the revised land use diagram would allow a similar amount and type of development as that evaluated in the Draft EIR. Similarly, the proposed policy changes would not affect the impact findings because they do not reduce the effectiveness of any policies that would help to mitigate potential impacts. In addition, the policies related to the General Plan land use diagram support the land use diagram and associated development projections analyzed below.

AESTHETICS

Chapter 4.1 of the Draft EIR describes the aesthetic characteristics of the EIR Study Area. Development in the ELTR and Northeast Growth Areas could impact views of hillsides to the west, degrade the visual quality of riparian corridors, and alter the visual quality of open space and agricultural areas. In addition, development in the Northeast Growth Area could degrade the scenic values of Interstate 80 that prompted Solano County to designate it as a scenic roadway. Policies in the General Plan would protect scenic views and resources, but the Draft EIR found a significant impact resulting from a substantial change to the visual character of undeveloped portions of Vacaville. There are no mitigation measures available that would reduce the impact to a less-than-significant level.

The proposed changes to the General Plan land use diagram in the ELTR Growth Area would reduce the potential impacts on aesthetics due to the designation of less land for development, resulting in less obstruction of hillside viewsheds to the west, reduced development along riparian areas, and reduced development of agricultural and open space areas. As a result, no new significant environmental impacts are associated with the proposed land use changes and no revisions to the EIR analysis are required.

AGRICULTURE AND FORESTRY RESOURCES

Chapter 4.2 of the Draft EIR describes the agriculture and forestry resources present in the EIR Study Area. Implementation of the General Plan would result in the conversion of 2,640 acres of farmlands of concern under CEQA to non-agricultural purposes, including large areas in the ELTR Growth Area, resulting in a significant impact. There are no mitigation measures available that would reduce the impact to a less-than-significant level. In addition, urban development in the ELTR Growth Area could result in the conversion of adjacent farmlands of concern under CEQA to the east due to its incompatible nature. However, the General Plan contains an Urban Growth Boundary and policies and actions that would minimize potential conflicts between agricultural and urban uses and the Solano County Code “Right-to-Farm Ordinance” would protect agricultural operations from nuisance complaints; the related impact was found to be less than significant. The proposed changes to the General Plan land use diagram in the ELTR Growth Area would reduce impacts on agricultural resources by designating less farmland of concern under CEQA for development. As a result, no new significant environmental impacts are associated with the proposed land use changes and no revisions to the EIR analysis are required.

AIR QUALITY

Chapter 4.3 of the Draft EIR describes the air quality conditions in and around the EIR Study Area. Air quality impacts related to consistency with air quality plans, criteria air pollutants, carbon monoxide hot spots, and toxic air contaminants are closely linked to mobile source emissions and vehicle miles traveled (VMT). As described in the Traffic and Transportation section of this memo, the revised General Plan land use diagram in the ELTR Growth Area would result in fewer vehicle trips and VMT; specifically, compared to the analysis in the EIR, the proposed land use diagram revisions would result in a 3.7-percent reduction in additional citywide AM peak hour trips to the year 2035 and a 2.5-

percent reduction in additional citywide PM peak hour trips. Therefore, related air quality impacts would be reduced.

Similarly, because there would be less development under the revised land use diagram, construction emissions would also be reduced, which would reduce associated air quality impacts. Odor impacts are also not anticipated to increase, since the revisions would not introduce new odor source, nor would they place development in a new area that is impacted by existing odors. As a result, no new significant environmental impacts are associated with the proposed land use changes and no revisions to the EIR analysis are required.

BIOLOGICAL RESOURCES

Chapter 4.4 of the Draft EIR describes the biological resources present within the EIR Study Area. Development allowed by the General Plan, including in the ELTR and Northeast Growth Areas, could impact biological resources. Policies in the General Plan, combined with avoidance, minimization, and mitigation measures in the Draft Solano Habitat Conservation Plan (HCP), would protect biological resources. One significant and unavoidable impact would occur as a result of a land use designation in an area outside of the areas proposed for change.

The proposed changes to the General Plan land use diagram in the ELTR Growth Area would reduce potential impacts to biological resources because less land is designated for development, thereby reducing the amount of habitat and other resources converted to urban uses. As a result, no new significant environmental impacts are associated with the proposed land use changes and no revisions to the EIR analysis are required.

CULTURAL RESOURCES

Chapter 4.5 of the Draft EIR describes the cultural resources present within the EIR Study Area. Development allowed by the General Plan, including in the ELTR and Northeast Growth Areas, could impact cultural resources, but General Plan policies would reduce impacts to a less-than-significant level. The proposed changes to the General Plan land use diagram in the ELTR Growth Area would reduce potential impacts to cultural resources because less land is designated for development, thereby reducing the amount of ground-disturbing activities that could impact buried resources. As a result, no new significant environmental impacts are associated with the proposed land use changes and no revisions to the EIR analysis are required.

GEOLOGY, SOILS, AND MINERAL RESOURCES

Chapter 4.6 of the Draft EIR describes the general geologic constraints and mineral resources present within the EIR Study Area. Development throughout the EIR Study Area is subject to seismic and geologic risks. In the ELTR Growth Area, there is a limited area of very high liquefaction potential along Old Alamo Creek. However, General Plan policies, combined with the California Building Code, would reduce such impacts to a less-than-significant level. The proposed changes to the General Plan land use diagram in the ELTR Growth Area designates less land for development, thereby reducing the potential geologic risk impacts within the study area, including land along Old Alamo Creek with very

high liquefaction potential. As a result, no new significant environmental impacts are associated with the proposed land use changes and no revisions to the EIR analysis are required.

GREENHOUSE GAS EMISSIONS

Chapter 4.7 of the Draft EIR describes the general greenhouse gas (GHG) emissions generated by activities in the EIR Study Area. The General Plan would be consistent with the Energy and Conservation Action Strategy (ECAS), which would result in less-than-significant impacts regarding compliance with a qualified GHG emissions reduction strategy. However, the General Plan and ECAS together would likely not be sufficient to achieve the substantial Statewide GHG emission reduction goal established by Executive Order S-03-05 for the year 2050 in the absence of other State and federal emission reduction measures. Therefore, the General Plan and ECAS would have a significant and unavoidable impact.

The changes to the land use diagram would reduce both residential and non-residential development capacity and would therefore result in a 3.7 percent reduction in additional citywide AM peak hour trips and a 2.5 percent reduction in additional citywide PM peak hour trips in the year 2035. Changes in VMT and the associated changes in greenhouse gas emissions would be expected to be proportional to these changes in additional vehicle trips and, thus, would be less than evaluated in the EIR. In addition, potential GHG emissions from energy and natural gas use, water consumption, wastewater treatment, solid waste disposal, landscaping and construction equipment, and other development sources would also be less than the levels analyzed in the EIR. The changes in the land use diagram do not affect the measures, target, or implementation and monitoring provisions of the ECAS, and the ECAS would continue to meet the criteria for a qualified GHG emissions reductions strategy under State law. As a result, no new significant environmental impacts are associated with the proposed land use changes and no revisions to the EIR analysis are required.

HAZARDS AND HAZARDOUS MATERIALS

Chapter 4.8 of the Draft EIR describes the hazards and hazardous materials conditions present within the EIR Study Area. Implementation of the General Plan could expose people to hazardous materials from the construction and operation of new development and land uses. However, General Plan policies and other existing regulations would reduce these impacts to a less-than-significant level. Given that the proposed changes to the ELTR Growth Area land use map mainly reduce residential development potential, these changes are not likely to affect hazardous materials from the operation of new development and land uses because residential uses typically do not involve the use of significant levels of hazardous materials. In addition, hazardous materials usage related to construction activity would decrease due to the decrease in the amount of development. The proposed change to the Northeast Growth Area could reduce impacts related to the operation of future land uses because it would eliminate the Business Park designation on this site, which would very likely reduce the potential for industrial uses utilizing hazardous materials. As a result, no new significant environmental impacts are associated with the proposed land use changes and no revisions to the EIR analysis are required.

HYDROLOGY AND WATER QUALITY

Chapter 4.9 of the Draft EIR describes the general hydrologic conditions present within the EIR Study Area. Development allowed by the General Plan, including in the ELTR Growth Area, could alter drainage patterns and degrade water quality from construction activity and from the conversion of agricultural areas to urban uses, which can increase the amount of impervious surfaces and create new sources of water pollution. In addition, development within the 100-year floodplain along Ulatis, Alamo, and Old Alamo Creeks in the ELTR Growth Area could expose people to flood hazards and impede flood flows along these creeks. General Plan policies and other existing regulations would reduce potential impacts to a less-than-significant level.

The proposed changes to the General Plan land use diagram in the ELTR Growth Area designate less land for development thereby reducing the impacts on hydrology and water quality due to the reduction in construction activity and urbanization that could affect drainage patterns and water quality and the placement of housing and structures within the 100-year floodplain. As a result, no new significant environmental impacts are associated with the proposed land use changes and no revisions to the EIR analysis are required.

LAND USE AND PLANNING

Chapter 4.10 of the Draft EIR describes the land use and planning conditions present within the EIR Study Area. Although the General Plan would involve significant changes to the land use characteristics in the ELTR and Northeast Growth Areas, it would not divide established communities, conflict with other plans, or conflict with the Draft Solano HCP. The proposed changes to the ELTR Growth Area would reduce the extent of development in that area and, thus, would not affect the CEQA standards of significance related to land use and planning. As a result, no new significant environmental impacts are associated with the proposed land use changes and no revisions to the EIR analysis are required.

NOISE

Chapter 4.11 of the Draft EIR describes the general noise conditions in the EIR Study Area. As described in the Draft EIR, most noise impacts from development under the General Plan would be less-than-significant. However, 2035 horizon buildout would increase traffic noise along three roadway segments (from 5.1 to 5.8 dBA L_{dn}). These impacts would be mitigated to a less-than-significant level through mitigation measures discussed in the Draft EIR, including the use of noise barriers, site design standards, and improved pavement surfaces to reduce noise.

To evaluate the potential traffic noise impacts associated with the land use diagram changes, the changes in trip generation and PM peak trip volumes were compared, as provided in the Traffic and Transportation section of this memo. Compared to the EIR, the proposed revisions to the ELTR Growth Area land use diagram would result in a 3.7 percent reduction in additional citywide AM peak hour trips and a 2.5 percent reduction in additional citywide PM peak hour trips in the year 2035. Decreases in VMT and the associated decrease in traffic noise would be expected to be proportional to this decrease in additional vehicle trips and, thus, less than analyzed in the EIR, including along the three impacted roadway segments identified in the EIR.

The land use diagram changes would not change the nature or mix of traffic to and from the ELTR Growth Area, for example, by increasing heavy truck traffic, as compared to the traffic mix analyzed in the EIR. The changes in the land use diagram would not affect implementation of the Noise Element and compliance with the City's Municipal Code. These regulations would result in noise levels that are acceptable to the City and would result in less than significant noise impacts from stationary sources. The proposed land use changes, then, would not affect the impact findings. As a result, no new significant noise impacts are associated with the proposed land use change and no changes to the EIR analysis are required.

POPULATION AND HOUSING

Chapter 4.12 of the Draft EIR describes the population and housing conditions in the EIR Study Area. The Draft EIR found a significant and unavoidable impact on population due to a citywide population growth of 26,500 projected for 2035 under the General Plan, which exceeds the Association of Bay Area Governments' (ABAG) population growth projection of 11,400. The proposed changes to the ELTR Growth Area land use map, however, would reduce the growth projected under the General Plan due to the reduction in the amount of land designated for residential development, as shown in Table 2. Specifically, in 2035, the proposed change would reduce the anticipated number of new residential units by 166. Using the 2.74 persons per household rate reported in the Draft EIR, this equates to a population reduction of 455 persons in the ELTR Growth Area. Therefore, although the total citywide population in 2035 would still exceed ABAG's population projection and, thus, remain a significant and unavoidable population impact, no new significant environmental impacts on population and housing are associated with the proposed land use changes due to the projected decrease in population by 455 persons in the ELTR Growth Area. As a result, no revisions to the EIR analysis are required.

PUBLIC SERVICES AND RECREATION

Chapter 4.13 of the Draft EIR describes the public services and recreation conditions in the EIR Study Area. Development allowed by the General Plan would increase population and employment throughout the city, which would increase demands on public services and recreation. However, impacts would be less-than-significant due to General Plan policies and other existing regulations. The proposed changes to the General Plan land use diagram in the ELTR Growth Area would further reduce these impacts due to the reduction in land designated for development, thereby reducing the number of new residents in need of such services and the number of City employees needed to provide such services.

The Draft EIR analyzes the parkland ratios under the General Plan on page 4.13-50. As described on that page, an additional 91 acres of neighborhood parkland and 50 acres of community parkland would be needed by 2035 to meet the City's parkland standards. The planned parks in the Draft General Plan would meet the need for community parkland, but there would still be a 19-acre deficit of neighborhood parkland.

As discussed in the *Population and Housing* section above, the proposed land use diagram changes would reduce the 2035 population by 455 people. This results in a reduction of needed parkland to

meet the City's parkland ratio. Specifically, the acreage of neighborhood and community parks needed to meet the ratio would be reduced by approximately 1 acre each. However, the proposed land use diagram changes would also reduce the acreage of planned neighborhood and community parks anticipated by 2035. Specifically, the acreage of planned neighborhood parks would be reduced by 16 acres and the acreage of planned community parks would be reduced by 24 acres. With these reductions, the community parkland ratio would still be met, but the neighborhood parkland deficiency city-wide would be increased by 15 acres.¹ However, the revisions to the General Plan would not change the policies that support the City's parkland goals or the policies that would minimize the environmental impacts of new or expanded park facilities. Furthermore, as described on page 4.13-52 of the Draft EIR, it is not known at what time or location new or expanded park facilities would be required, or what the exact nature of those facilities would be, so project-specific environmental impacts cannot be determined. The EIR is a programmatic document and does not evaluate the environmental impacts of any project-specific development. Future project-specific review would ensure that any environmental impacts are disclosed and mitigated to the extent possible and that parkland requirements are met for individual projects.

In summary, no new significant environmental impacts are associated with the proposed land use changes and no revisions to the EIR analysis are required.

TRAFFIC AND TRANSPORTATION

Chapter 4.14 of the Draft EIR describes the traffic and transportation conditions present within the EIR Study Area and the potential impacts under the updated General Plan. Under the updated General Plan, impacts to air traffic and design hazards would be less than significant, but significant and unavoidable impacts to emergency access and level of service at a number of local intersections would result. In addition, the General Plan would cause a significant but mitigable impact to public transit. The proposed land use changes to the land use diagram were reviewed to determine whether they might change the impacts identified in the EIR. That analysis follows below.

Developable Acreage Comparison

The potential 2035 land uses in the ELTR Growth Area were compiled for both the Draft General Plan as evaluated in the EIR, and for the proposed land use changes to the ELTR Growth Area ("Revised General Plan"). The differences are shown in Table 5, below. Note that this table does not show the acreages for the entire growth area; rather, it shows only the acreages that were assumed to be developed by 2035 because the EIR's analysis and impact findings were based on the anticipated level of development in 2035.

The Draft General Plan included designations for additional land in the ELTR area which would accommodate additional potential development beyond the 2035 planning horizon year. The Revised

¹ The acreage of planned neighborhood parkland would be reduced by 16 acres, but 1 acre would be offset by the reduction in population, as discussed above.

Table 5: Comparison of 2035 Developable Acreage in ELTR Growth Area

Land Use	Draft General Plan	Revised General Plan	Difference
RESIDENTIAL ACRES			
Low Density	215	226	+11
Low Medium Density	216	149	-67
Medium Density	24	9	-15
High Density	0	14	+14
Total Residential Acres	455	398	-57
NON-RESIDENTIAL ACRES			
Neighborhood Commercial	12	9	-3
School	88	77	-11
Public Park	14	23	+9
Total Non-Residential Acres	37	32	-5
TOTAL DEVELOPABLE ACRES	569	507	-62

General Plan includes 608 acres of “Urban Reserve,” which would not be available for development without a General Plan Amendment and further CEQA review. Therefore, the 2035 developable acres listed above for the Revised General Plan would represent all of the ultimate development potential of the ELTR Growth Area, with the small exception of the Commercial Service parcel in the southern portion of the growth area.²

Trip Generation Comparison

The changes in 2035 peak hour vehicle trip generation associated with the proposed land use revisions to the ELTR Growth Area were evaluated and are shown in Table 6 and Table 7. The revised land uses would result in a 12 percent decrease in AM peak hour trip generation from land uses within the ELTR Growth Area and a 13 percent decrease in PM peak hour trip generation from land uses

² Consistent with the assumptions in the Draft EIR, it was assumed that, even though there is development potential, the Commercial Service site would not redevelop by 2035. The Commercial Service designation is intended to preserve an existing use.

Table 6: Comparison of 2035 AM Peak Hour Trip Generation in East of Leisure Town Growth Area

Land Use	Land Use			Trips per Unit	AM Peak Hour Trips		
	Units	Draft General Plan	Revised General Plan		Draft General Plan	Revised General Plan	Difference
RESIDENTIAL							
Low Density	DU	787	815	0.75	590	610	+20
Low Medium Density	DU	1,328	988	0.75	1,000	740	-260
Medium Density	DU	226	87	0.67	150	60	-90
High Density	DU	0	283	0.46	0	130	+130
Total Residential		2,341	2,173		1,740	1,540	-200
NON-RESIDENTIAL							
Neighborhood Commercial	Acres	12	9	11.7	140	100	-40
Schools	Acres	88	77	28.5	2,620	2,310	-310
Public Park	Acres	14	23	0.54	~10	~10	-
Total Non-Residential		114	109		2,770	2,420	-350
TOTAL					4,510	3,960	-550

within the ELTR Growth Area compared to the 2035 ELTR land uses evaluated in the EIR. Elimination of an elementary school in the ELTR Growth Area would account for over half of the reduction in AM peak trip generation, while a reduction in commercial acreage would account for about 30 percent of the reduction in PM peak trip generation.

Potential Changes in Transportation Impacts

Overall Traffic Impacts

In general, the reduced development potential and trip generation associated with the revised land use map for the ELTR Growth Area would reduce transportation impacts compared to the General Plan EIR. Traffic to and from the ELTR Growth Area would be reduced by 12 to 13 percent compared

Table 7: Comparison of 2035 PM Peak Hour Trip Generation in East of Leisure Town Growth Area

Land Use	Land Use			Trips per Unit	PM Peak Hour Trips		
	Units	Draft General Plan	Revised General Plan		Draft General Plan	Revised General Plan	Difference
RESIDENTIAL							
Low Density	DU	787	815	1.01	800	820	+20
Low Medium Density	DU	1,328	988	1.01	1,340	1,000	-340
Medium Density	DU	226	87	0.78	180	70	-110
High Density	DU	0	283	0.58	0	160	+160
Total Residential		2,341	2,173		2,320	2,050	-270
NON-RESIDENTIAL							
Neighborhood Commercial	Acres	12	9	44.2	530	380	-150
Schools	Acres	88	77	12.5	1,050	960	-90
Public Park	Acres	14	23	0.63	~10	~10	-
Total Non-Residential		114	109		1,590	1,350	-230
TOTAL					3,910	3,400	-510

to the traffic evaluated in the EIR. Impacts on intersection operations and road segments directly serving the ELTR Growth Area could be reduced proportionately compared to the impacts reported in the EIR. Therefore, the EIR represents a conservative assessment of traffic impacts attributable to the proposed General Plan.

Local Traffic Impacts

The revised ELTR Growth Area land use map would result in slight geographic differences in the locations of 2035 development compared to the 2035 development locations assumed in the EIR. For example, the revised land use map assumes no new 2035 development south of Fry Road, whereas the EIR had assumed Low and Low Medium Density Residential development in that area. On the other hand, the revised land use map includes developable acreage north of Hawkins Road and the 2035 analysis in the EIR did not assume development here.

Since the revised ELTR Growth Area land use map would use the same primary access points to Leisure Town Road as assumed in the EIR (Fry Road, Elmira Road, realigned Hawkins Road at Ulatis Road), it is unlikely that there would be significant differences in the distribution of traffic to various intersections adjacent to the development area, even though there are slight differences in the geographic locations of assumed development. In addition, since the overall traffic generation in the ELTR Growth Area would be reduced by 12 to 13 percent compared to the EIR assumptions, it is likely that overall traffic operations would be comparable to or improved compared to that analyzed in the EIR.

Citywide Transportation Impacts

The Draft EIR reported that the total increase in vehicle trips associated with the Draft General Plan from existing conditions to the 2035 planning horizon year would be approximately 15,000 AM peak hour trips and 20,300 PM peak hour trips. Therefore, compared to the EIR, the proposed revisions to the ELTR Growth Area land use map would result in a 3.7 percent reduction in additional citywide AM peak hour trips to the year 2035 and a 2.5 percent reduction in additional citywide PM peak hour trips. These trip reductions would reduce VMT compared to the VMT levels that were evaluated in the EIR.

Traffic and Transportation: Conclusions

The revised General Plan land use plan for the ELTR Growth Area would not increase traffic and transportation impacts or require any additional mitigation measures than those already described and analyzed in the Draft and Final EIR. The revised land use plan for the ELTR Growth Area designates less land for development and would reduce trip generation compared to the analysis in the EIR. Therefore, transportation impacts, particularly impacts to intersections and roadways in the vicinity of the ELTR Growth Area including Leisure Town Road, would be reduced compared to the Draft General Plan. The EIR represents a conservative assessment of potential transportation impacts and mitigation measures compared to the revised General Plan land use. For these reasons, the Draft EIR and Final EIR adequately disclose and analyze the traffic and transportation impacts and mitigation measures for the Vacaville General Plan including the proposed land use revisions to the ELTR Growth Area.

UTILITIES AND SERVICE SYSTEMS

Chapter 4.15 of the Draft EIR describes the utilities and service system conditions in the EIR Study Area. New and expanded water, wastewater, and stormwater facilities would be required to serve new development allowed by the General Plan, but General Plan policies and other existing regulations would reduce impacts to a less-than-significant level. Further, by designating less land for development, the proposed land use changes in the ELTR Growth Area would lessen the impacts on utilities due to the reduction in demand for water, wastewater, and stormwater utilities. As a result, no new significant environmental impacts are associated with the proposed land use changes and no revisions to the EIR analysis are required.

Conclusions

As described above, no new significant environmental impacts are associated with the proposed land use changes and policy revisions for the City of Vacaville General Plan; in fact, most environmental impacts would be reduced. No changes to the analysis contained in the Draft EIR are required. For this reason, no new significant information needs to be added to the Draft EIR that would require recirculation under Section 15088.5(a) of the CEQA Guidelines.