



FINAL

ENVIRONMENTAL IMPACT REPORT

FOR THE

WEST DAVIS ACTIVE ADULT COMMUNITY PROJECT
(SCH: 2017042043)

APRIL 2018

Prepared for:

City of Davis
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Davis, CA 95616
(530) 757-5610

Prepared by:

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D e N o v o P l a n n i n g G r o u p

A Land Use Planning, Design, and Environmental Firm



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FINAL EIR

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INTRODUCTION

The City of Davis (City) determined that a project-level environmental impact report (EIR) was required for the proposed West Davis Active Adult Community Project (project) pursuant to the requirements of the California Environmental Quality Act (CEQA).

A Project EIR is an EIR which examines the environmental impacts of a specific development project. This type of EIR focuses primarily on the changes in the environment that would result from the project. A Project EIR examines all phases of the project including planning, construction and operation. The Project EIR approach is appropriate for the West Davis Active Adult Community Project because it allows comprehensive consideration of the reasonably anticipated scope of the project, including development and operation of the project, as described in greater detail below.

PROJECT DESCRIPTION

The following provides a brief summary and overview of the proposed project. Section 2.0 of the Draft EIR includes a detailed description of the proposed project, including maps and graphics. The reader is referred to Section 2.0 of the Draft EIR for a more complete and thorough description of the components of the proposed project.

The project site consists of approximately 74 acres located northwest and adjacent to the City of Davis within the City of Davis Sphere of Influence (SOI) of unincorporated Yolo County. Additionally, the project includes approximately 11.53 acres of offsite improvements. These offsite improvements would include an agricultural buffer along the western and northern boundaries of the project site, improvements along Covell Boulevard and Risling Place, a proposed offsite trail, and proposed drainage channel and drainage basin improvements. The project site is bounded by existing agricultural land within unincorporated Yolo County (within the City's SOI) to the west, nine mapped but undeveloped 13- to 23-acre residential lots to the north, the Sutter Davis Hospital and Risling Court to the east, and West Covell Boulevard to the south. The project site is currently undeveloped and has been previously used for agricultural uses.

The project includes development of: 150 affordable, age-restricted apartments; 32 attached, age-restricted cottages; 94 attached, age-restricted units; 129 single-family detached, age-restricted units; 77 single-family detached, non-age-restricted units; an approximately three-acre continuing care retirement community, which would likely consist of 30 assisted living, age-restricted detached units; an approximately 4.3-acre mixed use area, which would likely consist of a health club, restaurant, clubhouse, and up to 48 attached, age-restricted units; dog exercise area and tot lot; associated greenways, drainage, agricultural buffers; and off-site stormwater detention facilities. Upon completion of the project, the approximately 74-acre site would provide up to 560 dwelling units and 4.5 miles of off street biking and walking paths within the project area and an additional 0.22 miles of off street biking and walking paths offsite.

Access to the project site would be provided via Risling Court, which runs along the eastern edge of the site, as well as an entrance on West Covell Boulevard. The proposed internal north-south and east-west roadways would connect to housing and recreation areas. Cul-de-sacs are included in the project plan within the proposed cottages development area and as a termination for some internal streets.

The project site is currently designated Agriculture by the City of Davis General Plan Land Use Map. The proposed project would require a City of Davis General Plan Amendment to the Land Use Element to change land uses on the project site. Changes to the Land Use Element would include changing the entire project site and the off-site buffer/stormwater detention areas from Agriculture to Residential – Medium Density, Residential – High Density, Neighborhood Mixed Use, and Urban Agriculture Transition Area. The project site is currently zoned as Agriculture-Intensive by Yolo County. The project would also include a rezone to PD (Planned Development). Approval of the proposed project would result in the annexation of the approximately 74-acre project site into the City of Davis.

Additionally, because the General Plan Amendment would redesignate the site from Agricultural and Urban Agriculture Transition Area to urban uses, voter approval is required under the Citizens' Right to Vote on Future Use of Open Space and Agricultural Lands Ordinance (Measure R). Measure R requires approval of Baseline Project Features such as recreation facilities, public facilities, and significant project design features, which cannot be eliminated, significantly modified, or reduced without subsequent voter approval. A public vote on the project, under the provisions of Measure R, would occur following completion of the CEQA review process (i.e., after certification of the Final EIR).

Refer to Section 2.0, Project Description, in the Draft EIR for a more complete description of the details of the proposed project.

ALTERNATIVES TO THE PROPOSED PROJECT

Section 15126.6 of the CEQA Guidelines requires an EIR to describe a reasonable range of alternatives to the project or to the location of the project which would reduce or avoid significant impacts, and which could feasibly accomplish the basic objectives of the proposed project. The alternatives analyzed in this EIR include the following four alternatives in addition to the proposed West Davis Active Adult Community Project:

- No Project (No Build) Alternative
- Conventional (Non-Age Restricted) Alternative
- Higher Density, Less Land Alternative
- Off-Site (Inside Mace Curve) Alternative

These alternatives are described in detail in Section 5.0, Alternatives to the Proposed Project, in the Draft EIR. The No Project (No Build) Alternative is the environmentally superior alternative. However, as required by CEQA, when the No Project (No Build) Alternative is the environmentally superior alternative, the environmentally superior alternative among the others must be

identified. The environmentally superior alternative was determined using a numerical scoring system, which assigns a score of “2,” “3,” or “4” to the proposed project and each of the alternatives with respect to how each alternative compares to the proposed project in terms of the severity of the environmental topics addressed in the Draft EIR. A score of “2” indicates that the alternative would have a better (or lessened) impact when compared to the proposed project. A score of “3” indicates that the alternative would have the same (or equal) level of impact when compared to the proposed project. A score of “4” indicates that the alternative would have a worse (or greater) impact when compared to the proposed project. The project alternative with the lowest total score is considered the environmentally superior alternative.

It is noted that the superior alternative would depend on the City’s local priorities (i.e., preservation of agricultural land, traffic impacts to the regional roadway system, maintenance of public services and utilities services, etc.), as well as the ability to meet the proposed project’s objectives. This scoring system treats all impact areas equally. Readers and decision-makers may consider one impact area to be more important than another, and could potentially use a weighted scoring system. However, the point system in this EIR does provide a way to identify alternatives that may have orders of magnitude greater or lesser impacts than the proposed project. The Conventional (Non-Age Restricted) Alternative would result in 53 points, the (Higher Density, Less Land Alternative would result in 38 points, and the Off-Site (Inside Mace Curve) Alternative would result in 34 points. Therefore, the Off-Site (Inside Mace Curve) Alternative is the next environmentally superior alternative to the proposed project.

COMMENTS RECEIVED

The Draft EIR addressed environmental impacts associated with the proposed project that are known to the City, were raised during the Notice of Preparation (NOP) process, or raised during preparation of the Draft EIR. The Draft EIR discussed potentially significant impacts associated with aesthetics and visual resources, agricultural resources, air quality, biological resources, cultural and tribal resources, geology and soils, greenhouse gases and climate change, hazards and hazardous materials, hydrology and water quality, land use, noise and vibration, population and housing, public services and recreation, transportation and circulation, and utilities.

During the NOP process, several comments were received related to the analysis that should be included in the Draft EIR. These comments are included as Appendix A of the Draft EIR, and were considered during preparation of the Draft EIR.

The City of Davis received several comment letters regarding the Draft EIR from public agencies and private citizens. These comment letters on the Draft EIR are identified in Table 2.0-1 of this Final EIR. The comments received during the Draft EIR review processes are addressed within this Final EIR.

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This Final Environmental Impact Report (Final EIR) was prepared in accordance with the California Environmental Quality Act (CEQA) and the State CEQA Guidelines (Section 15132). The City of Davis (Davis, or City) is the lead agency for the environmental review of the West Davis Active Adult Community Project (project) and has the principal responsibility for approving the project. This Final EIR assesses the expected environmental impacts resulting from approval of the project and associated impacts from subsequent development and operation of the project, as well as responds to comments received on the Draft Environmental Impact Report (Draft EIR).

1.1 PURPOSE AND INTENDED USES OF THE EIR

CEQA REQUIREMENTS FOR A FINAL EIR

This Final EIR for the proposed project has been prepared in accordance with the California Environmental Quality Act (CEQA) and State CEQA Guidelines. State CEQA Guidelines Section 15132 requires that a Final EIR consist of the following:

- the Draft EIR or a revision of the draft;
- comments and recommendations received on the Draft EIR, either verbatim or in summary;
- a list of persons, organizations, and public agencies commenting on the Draft EIR;
- the responses of the lead agency to significant environmental concerns raised in the review and consultation process; and
- any other information added by the lead agency.

In accordance with State CEQA Guidelines Section 15132(a), the Draft EIR is incorporated by reference into this Final EIR.

An EIR must disclose the expected environmental impacts, including impacts that cannot be avoided, growth-inducing effects, impacts found not to be significant, and significant cumulative impacts, as well as identify mitigation measures and alternatives to the proposed project that could reduce or avoid its adverse environmental impacts. CEQA requires government agencies to consider and, where feasible, minimize environmental impacts of proposed development, and an obligation to balance a variety of public objectives, including economic, environmental, and social factors.

PURPOSE AND USE

The City of Davis, as the lead agency, has prepared this Final EIR to provide the public and responsible and trustee agencies with an objective analysis of the potential environmental impacts resulting from approval, construction, and operation of the proposed West Davis Active Adult Community Project. Responsible and trustee agencies that may use the EIR are identified in Sections 1.0 and 2.0 of the Draft EIR.

The environmental review process enables interested parties to evaluate the proposed project in terms of its environmental consequences, to examine and recommend methods to eliminate or

1.0 INTRODUCTION

reduce potential adverse impacts, and to consider a reasonable range of alternatives to the project. While CEQA requires that consideration be given to avoiding adverse environmental effects, the lead agency must balance adverse environmental effects against other public objectives, including the economic and social benefits of a project, in determining whether a project should be approved.

This EIR will be used as the primary environmental document to evaluate all aspects of construction and operation of the proposed project. The details and operational characteristics of the proposed project are identified in Chapter 2.0, Project Description, of the Draft EIR (December 2017).

1.2 ENVIRONMENTAL REVIEW PROCESS

The review and certification process for the EIR has involved, or will involve, the following general procedural steps:

NOTICE OF PREPARATION AND INITIAL STUDY

The City circulated an Initial Study (IS) and Notice of Preparation (NOP) of an EIR for the proposed project on April 14, 2017 to trustee agencies, the State Clearinghouse, and the public. A public scoping meeting was held on April 26, 2017 to present the project description to the public and interested agencies, and to receive comments from the public and interested agencies regarding the scope of the environmental analysis to be included in the Draft EIR. Concerns raised in response to the NOP were considered during preparation of the Draft EIR. The NOP and responses to the NOP by interested parties are presented in Appendix A of the Draft EIR.

NOTICE OF AVAILABILITY AND DRAFT EIR

The City of Davis published a public Notice of Availability (NOA) for the Draft EIR on December 22, 2017 inviting comment from the general public, agencies, organizations, and other interested parties. The NOA was filed with the State Clearinghouse (SCH # 2017042043) and the County Clerk, and was published in a local newspaper pursuant to the public noticing requirements of CEQA. The Draft EIR was available for public review and comment from December 22, 2017 through February 20, 2018.

The Draft EIR contains a description of the project, description of the environmental setting, identification of project impacts, and mitigation measures for impacts found to be significant, as well as an analysis of project alternatives, identification of significant irreversible environmental changes, growth-inducing impacts, and cumulative impacts. The Draft EIR identifies issues determined to have no impact or a less-than-significant impact, and provides detailed analysis of potentially significant and significant impacts. Comments received in response to the NOP were considered in preparing the analysis in the Draft EIR.

RESPONSE TO COMMENTS/FINAL EIR

The City of Davis received several comment letters regarding the Draft EIR from public agencies and private citizens. These comment letters on the Draft EIR are identified in Table 2.0-1, and are found in Section 2.0 of this Final EIR.

In accordance with CEQA Guidelines Section 15088, this Final EIR responds to the written comments received on the Draft EIR, as required by CEQA. This Final EIR also contains minor edits to the Draft EIR, which are included in Chapter 3.0, Revisions. This document, as well as the Draft EIR as amended herein, constitute the Final EIR.

CERTIFICATION OF THE EIR/PROJECT CONSIDERATION

The City of Davis will review and consider the Final EIR. If the City finds that the Final EIR is "adequate and complete," the Davis City Council may certify the Final EIR in accordance with CEQA and City of Davis environmental review procedures and codes. The rule of adequacy generally holds that an EIR can be certified if:

- 1) The EIR shows a good faith effort at full disclosure of environmental information; and
- 2) The EIR provides sufficient analysis to allow decisions to be made regarding the proposed project which intelligently take account of environmental consequences.

Upon review and consideration of the Final EIR, the Davis City Council may take action to approve, revise, or reject the project. A decision to approve the West Davis Active Adult Community Project, for which this EIR identifies significant environmental effects, must be accompanied by written findings in accordance with State CEQA Guidelines Sections 15091 and 15093. A Mitigation Monitoring and Reporting Program, as described below, would also be adopted in accordance with Public Resources Code Section 21081.6(a) and CEQA Guidelines Section 15097 for mitigation measures that have been incorporated into or imposed upon the project to reduce or avoid significant effects on the environment. This Mitigation Monitoring and Reporting Program has been designed to ensure that these measures are carried out during project implementation, in a manner that is consistent with the EIR.

1.3 ORGANIZATION OF THE FINAL EIR

This Final EIR has been prepared consistent with Section 15132 of the State CEQA Guidelines, which identifies the content requirements for Final EIRs. This Final EIR is organized in the following manner:

CHAPTER 1.0 – INTRODUCTION

Chapter 1.0 briefly describes the purpose of the environmental evaluation, identifies the lead, agency, summarizes the process associated with preparation and certification of an EIR, and identifies the content requirements and organization of the Final EIR.

CHAPTER 2.0 – COMMENTS ON THE DRAFT EIR AND RESPONSES

Chapter 2.0 provides a list of commenters, copies of written and electronic comments made on the Draft EIR (coded for reference), and responses to those written comments.

CHAPTER 3.0 – REVISIONS

Chapter 3.0 consists of minor revisions to the Draft EIR in response to comments received on the Draft EIR.

CHAPTER 4.0 – FINAL MMRP

Chapter 4.0 consists of a Mitigation Monitoring and Reporting Program (MMRP). The MMRP is presented in a tabular format that presents the impacts, mitigation measure, and responsibility, timing, and verification of monitoring.

2.1 INTRODUCTION

No new significant environmental impacts or issues, beyond those already covered in the Draft EIR for the West Davis Active Adult Community Project, were raised during the comment period. Responses to comments received during the comment period do not involve any new significant impacts or add “significant new information” that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5.

CEQA Guidelines Section 15088.5 states that: *New information added to an EIR 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 effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement.*

Sections 2.0 and 3.0 of this Final EIR include information that has been added to the EIR since the close of the public review period in the form of responses to comments and revisions.

2.2 LIST OF COMMENTERS

Table 2.0-1 lists the comments on the Draft EIR that were submitted to the City of Davis during the extended, 60-day public review period for the Draft EIR. The assigned comment letter or number, letter date, letter author, and affiliation, if presented in the comment letter or if representing a public agency, are also listed. Letters received from public agencies are coded with letters (A, B, etc.), while letters received from members of the public are coded with numbers (1, 2, etc.).

TABLE 2.0-1 LIST OF COMMENTERS ON DRAFT EIR

RESPONSE LETTER/NUMBER	INDIVIDUAL OR SIGNATORY	AFFILIATION	DATE
A	Jeffrey Morneau	California Department of Transportation	2-20-2018
B	Matthew Jones	Yolo-Solano Air Quality Management District	2-5-2018
1	N/A	Public Comments During Planning Commission Meeting	1-10-2018
2	David Kutz	Resident of Davis, California	12-24-2017
3	John Taylor	Resident of Davis, California	1-10-2018
4	Martha Teeter	Resident of Davis, California	2-19-2018
5	Robin Whitmore	Resident of Davis, California	1-5-2018
6	Russ Kanz & Toni Terhaar	Residents of Davis, California	2-12-2018
7	Todd Edelman	Resident of Davis, California	2-20-2018

2.3 COMMENTS AND RESPONSES

REQUIREMENTS FOR RESPONDING TO COMMENTS ON A DRAFT EIR

CEQA Guidelines Section 15088 requires that lead agencies evaluate and respond to all comments on the Draft EIR that regard an environmental issue. The written response must address the significant environmental issue raised and provide a detailed response, especially when specific comments or suggestions (e.g., additional mitigation measures) are not accepted. In addition, the written response must be a good faith and reasoned analysis. However, lead agencies need only to respond to significant environmental issues associated with the project and do not need to provide all the information requested by the commenter, as long as a good faith effort at full disclosure is made in the EIR (CEQA Guidelines Section 15204).

CEQA Guidelines Section 15204 recommends that commenters provide detailed comments that focus on the sufficiency of the Draft EIR in identifying and analyzing the possible environmental impacts of the project and ways to avoid or mitigate the significant effects of the project, and that commenters provide evidence supporting their comments. Pursuant to CEQA Guidelines Section 15064, an effect shall not be considered significant in the absence of substantial evidence.

CEQA Guidelines Section 15088 also recommends that revisions to the Draft EIR be noted as a revision in the Draft EIR or as a separate section of the Final EIR. Chapter 3.0 of this Final EIR identifies all revisions to the West Davis Active Adult Community Project Draft EIR.

RESPONSES TO COMMENT LETTERS

Written comments on the Draft EIR are reproduced on the following pages, along with responses to those comments. To assist in referencing comments and responses, the following coding system is used:

- Those comments received from public agencies are represented by a lettered response while comments received by individuals are represented by a numbered response.
- Each letter is lettered or numbered (i.e., Letter A) and each comment within each letter is numbered (i.e., comment A-1, comment A-2).

DEPARTMENT OF TRANSPORTATION

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February 20, 2018

03-YOL-2017-00038
 SCH# 201702043

Ms. Katherine Hess
 City of Davis
 23 Russel Blvd
 Davis, CA, 95616

Draft Environmental Impact Report (DEIR) – West Davis Active Adult Community

Dear Ms. Hess:

Thank you for including the California Department of Transportation (Caltrans) in the review process for the project environmental document referenced above. Caltrans' new mission, vision, and goals signal a modernization of our approach to California's transportation system. We review this local development for impacts to the State Highway System in keeping with our mission, vision and goals for sustainability/livability/economy, and safety/health. We provide these comments consistent with the State's smart mobility goals that support a vibrant economy, and build communities, not sprawl.

A-1

Mitigation Measure 3.14 (a)

The applicant states that Mitigation Measure 3.14 (a) is cumulatively considerable, and significant and unavoidable because "there are no assurances that Caltrans would approve and/or fund such a widening." While the scope of analysis is consistent with our needs as stated in our response to the Notice of Preparation, we disagree with the conclusion of Significant and Unavoidable Impacts. As the Responsible Agency for activities on the State Highway System (SHS), we have long extended a standing invitation to all of our partners to consult with us early on in the project development process, and frequently thereafter. Doing so enables us to inform your processes and work out the scope of analysis and any necessary mitigation measures and implementation of those mitigation measures. This kind of consultation will help avoid any erroneous conclusions that impacts to the SHS are significant and unavoidable. While significant and unavoidable impacts may occur, this is not one such occurrence.

A-2

An improvement project appears in the SACOGS MTP/SCS, for the State Route (SR) 113/West Covell Boulevard interchange. Working with us we will ensure that the fair share contributions provided are applied to this project, with any appropriate change in scope to include Mitigation Measure 3.14(a).

"Provide a safe, sustainable, integrated, and efficient transportation system to enhance California's economy and livability."

City of Davis
Feb 20, 2018
Page 2

Implementation of Mitigation Measure 3.14(a) would also allow for the implementation of Mitigation measure 3.14(b).

A-2
cont'd

We request a meeting with the City and the Project Applicant in order to move forward towards a mutually beneficial conclusion.

Please provide our office with copies of any further actions regarding this project. We would appreciate the opportunity to review and comment on any changes related to this development.

A-3

If you have any questions regarding these comments or require additional information, please contact Jacob Buffenbarger, Intergovernmental Review Coordinator at (530) 741-4507 or by email at: Jacob.Buffenbarger@dot.ca.gov.

Sincerely,



JEFFREY MORNEAU, Chief
Office of Transportation Planning - South Branch

"Provide a safe, sustainable, integrated, and efficient transportation system to enhance California's economy and mobility."

Response to Letter A: Jeffrey Morneau, California Department of Transportation

Response A-1: This comment is noted. This comment serves as an introduction to the comment letter and does not warrant a response. No further response is necessary.

Response A-2: The commenter notes that while the California Department of Transportation (Caltrans) agrees with the scope of the analysis (regarding Mitigation Measure 3.14[a]), Caltrans disagrees with the conclusion of “significant and unavoidable”. It is noted that the mitigation measure the commenter is referencing is Mitigation Measure 3.14-1, noted on page 3.14-44 of Section 3.14, Transportation and Circulation, of the Draft EIR. This mitigation measure, which contains two parts (part [a] and part [b]), addresses the cumulatively considerable and significant and unavoidable impacts anticipated at study intersections and freeway facilities.

Impacts associated with the West Covell Boulevard / State Route (SR) 113 Northbound Ramps intersection and the West Covell Boulevard / Sycamore Lane intersection are discussed on pages 3.14-44 through 3.14-46 of the Draft EIR. As noted on page 3.14-46 of Section 3.14, the widening of the SR 113 northbound off-ramp required by Mitigation Measure 3.14-1(a) would likely occur within Caltrans right-of-way, and would therefore require Caltrans approvals. It is unknown whether additional right-of-way would be needed for this improvement, or if a design exception would be required. There are no assurances that Caltrans would approve and/or fund such a widening. Since the remaining fair share funding sources needed for construction have not been identified, fair share payment would not ensure construction.

The lengthening of the eastbound left-turn lane at the West Covell Boulevard/Sycamore Lane intersection required by Mitigation Measure 3.14-1(b) is considered feasible because the roadway is maintained by the City of Davis, right-of-way is available, and no adjacent intersections, driveway, or turn lanes would be adversely affected. However, this turn lane lengthening is not sufficient, on its own, to restore operations to LOS E (i.e., northbound off-ramp widening is also required).

Impact 3.14-5 was deemed cumulatively significant and unavoidable for three primary reasons. First, payment of the proposed project’s fair share funding would not guarantee construction of the improvement because the remaining fair share funds have not been identified. Second, uncertainty of whether additional right-of-way acquisition would be needed brings into question the feasibility of the mitigation measure. Third, the City of Davis cannot ensure this improvement would be constructed as the improvement would occur within SR 113, which the City has no jurisdiction over. For these reasons, the City has decided to conclude that the project impacts would be cumulatively considerable and significant and unavoidable despite the presence of mitigation measures, which if implemented, would improve intersection operations to acceptable levels.

Response A-3: This comment is noted. This comment serves as a conclusion to the comment letter. The City will consult with Caltrans on this project. No further response is necessary.



YOLO-SOLANO AIR QUALITY MANAGEMENT DISTRICT

February 5, 2018

Katherine Hess
 City of Davis
 Department of Community Development and Sustainability
 23 Russell Blvd., Suite 2
 Davis, CA 95616



Dear Ms. Hess:

The Yolo-Solano Air Quality Management District (District) has received the Environmental Impact Report (EIR) for the West Davis Active Adult Community project (Project). The Project would be developed on a 74 acre site in west Davis and would include up to 560 new dwelling units and a 4.3 acre mixed-use area. We have reviewed the EIR and offer the following comments:

B-1

Construction Phase Mitigation Measures:

The DEIR determines that there will be a significant impact during the construction phase of the project with respect to fugitive dust that will be generated in excess of the District's threshold of significance for coarse particulates (PM10). The DEIR also finds that this impact can be reduced to a less-than-significant level with the implementation of mitigation measures. The District emphasizes that the following measures should be implemented as well during the project's construction phase in order to further reduce particulate emissions during construction:

B-2

- Portable equipment over 50 horsepower must have either a valid District Permit to Operate (PTO) or a valid statewide Portable Equipment Registration Program (PERP) placard and sticker issued by CARB.
- All heavy-duty on-road construction-related haul and delivery trucks with Gross Vehicle Weight Rating (GVWR) greater than 14,000 pounds should meet the requirements of the California Air Resources Board's On-road Truck and Bus Regulation. This includes limiting idling time to 5 minutes or less during any one-hour period.

Operational Impacts:

The DEIR's air quality section finds that the project's operational air quality impacts will be significant due to emissions of reactive organic gases (ROG) that will exceed the District's threshold of significance of 10 tons per year, but that these emission can be mitigated to a less-than-significant level. The DEIR proposes a list of mitigation measures to achieve this. The DEIR also finds that there will be significant

B-3

operational emissions of PM10 that will exceed the District's threshold of significance of 80 pounds per day, even after mitigation. According to Tables 3.3-7 and 3.3-8, emissions were modeled using CalEEMod version 2016.3.2. District staff has noticed that the CalEEMod emissions model can use certain defaults to characterize roadways for a given project, and may assume a certain amount of unpaved roadways. The District encourages the lead agency to review the CalEEMod outputs and to modify the percentage of unpaved roadways assumed for the project if CalEEMod defaults are not consistent with the project description. This may affect the amount of PM10 estimated for project operations, although it may not change the significance determination.

B-3
cont'd

Cumulative Impacts:

The DEIR contains an analysis of the project's cumulative impacts (DEIR pages 4.0-5 through 4.0-7). The analysis finds that cumulatively considerable impacts will be generated by the project, specifically with respect to PM10 and NOx emissions. While the analysis focuses on the District's adopted thresholds of significance to make this determination, District staff would point out that a cumulative air quality impact analysis should also evaluate the project's consistency with the applicable air quality attainment plans. The District is part of the Sacramento Federal Nonattainment Area (SFNA) for ozone. The air districts of the SFNA adopted a regional 8-hour Ozone Attainment and Regional Further Progress Plan to demonstrate attainment of the 2008 federal ozone standard by the appropriate deadline year. This plan relies on growth estimates provided by the Sacramento Area Council of Governments (SACOG), specifically the growth forecasts contained in the most recent SACOG Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS). The MTP/SCS bases its growth forecasts on the general plans of cities and counties within the SACOG area. To the extent that general plans are modified, these modifications may create growth that is inconsistent with what is assumed in the SACOG MTP/SCS. The Project site is currently in unincorporated Yolo County although it is in the City's Sphere of Influence. Because the project site will need to be incorporated into the City, and because uses will be changed from agricultural uses to urban uses, the lead agency should address whether this new growth will be consistent with the latest SACOG MTP/SCS and the growth assumptions contained in it.

B-4

Operational Mitigation Measures:

Since the DEIR finds that there will be both project-level and cumulative air quality impacts as a result of the proposed project, the lead agency is responsible for mitigating these impacts to the extent feasible. The DEIR already incorporates many mitigation measures to reduce air quality impacts. However, in the District and the larger SFNA, the emissions inventory is dominated by emissions from vehicles. Consequently, measures to reduce vehicle trips, accommodate alternative fueled vehicles and encourage alternative travel modes should be evaluated for possible incorporation into the project. With this in mind, District staff is in support of the project's proposed Bicycle and Pedestrian Safety Enhancement Program to encourage more trips by bicycle to assist in countering the potential negative

B-5

impacts to bicycle transportation from the proposed widening of Covell Boulevard to four lanes. District staff also suggests the following measures for consideration:

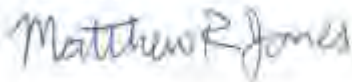
- Installation of appropriate electrical infrastructure in residential garages to allow for installation of Level 2 or greater electric vehicle charging stations.
- Shared-use Level 2 electric vehicle charging stations at community-use locations such as the University Retirement Center and the Activities and Wellness Center.
- Provide convenient and secure bicycle parking for residents and visitors at locations such as the Senior Affordable Retirement Apartments, University Retirement Center and Activities and Wellness Center.
- To assist with bicycle safety within the project, include bicycle-dedicated left turn pockets, if feasible, on both east- and westbound Covell Boulevard and on northbound Shasta Drive, consistent with southbound Rising Court.
- Include signage at channelized right turns that reminds motorists to yield/stop on red lights for pedestrians and bicyclists that are crossing the intersection.
- If feasible, narrow the southbound motor vehicle left turn pocket on John Jones Road to allow to a wider shared use northbound travel lane near the intersection on John Jones Road. This may also allow for a dedicated bicycle left turn pocket on east-bound Covell Boulevard.
- Include a green bike box and crosswalk on the east side of John Jones Road and Covell Boulevard. This would allow for bicycle left/northbound box turns and may help reduce the need for multiple bike/pedestrian crossings of this intersection.
- Since land surrounding the project is located within the City of Davis Sphere of Influence, there is the potential for new urban development to eventually be approved along the project's west, north, and/or eastern boundaries in the future. To ensure that there will be connectivity between the project and future development, the City should attempt to secure easements or right-of-ways as necessary to allow for future streets and/or multi-modal connections to potential future development adjacent to the project.

B-5
cont'd

The District appreciates the opportunity to comment on the EIR for this project. If you have any questions about the comments included in this letter, please feel free to contact me at 530-757-3668 or email me at mjones@ysaqmd.org.

B-6

Sincerely,



Matthew Jones
Planning Manager, YSAQMD

Response to Letter B: Matthew Jones, Yolo-Solano Air Quality Management District

Response B-1: This comment is noted. This comment serves as an introduction to the comment letter and does not warrant a response. No further response is necessary.

Response B-2: The commenter acknowledges that the Draft EIR concludes that construction-related fine particulate matter (PM₁₀) can be reduced to a less-than-significant level with implementation of mitigation measures. The commenter suggests two additional measures be implemented during construction in order to further reduce PM₁₀ emissions. This comment reflects the adequacy and accuracy of the Draft EIR's air quality analysis and no changes or additional mitigation measures are required.

The California Air Resources Board (CARB) currently regulates vehicle idling for heavy-duty diesel vehicles with a Gross Vehicle Weight Rating (GVWR) of 10,000 pounds or heavier. All heavy-duty on-road construction-related vehicles with a GVWR of 14,000 pounds (as referenced in the second bullet point of Comment 3-2) are also regulated by CARB in order to prohibit idling for more than five minutes within California's borders (exceptions apply). The City anticipates that the two suggested additional measures will be included in the project Conditions of Approval. No changes to the Draft EIR are required.

Response B-3: The commenter summarizes the conclusions of the operational portion of the Draft EIR's Air Quality section. The commenter encourages the City to review the California Emissions Estimator Model (CalEEMod) outputs and to modify the percentage of unpaved roadway assumed for the project, if CalEEMod defaults are not consistent with the project description. These comments and suggestions have been provided to the Davis Planning Commission and City Council for their review and consideration.

Once development of the project site is complete, all automobile roadways would be paved. As discussed on page 3.3-22 of Section 3.3, Air Quality, CalEEMod was used to estimate construction emissions for the proposed project. As also noted on this page, the following Mitigation Measures and parameters were used within CalEEMod to calculate reductions in PM₁₀, consistent with the dust Mitigation Measures listed in Table 3.3-10 (on page 3.3-21):

- Soil Stabilizer for Unpaved Roads (60% Fugitive Dust PM₁₀ reduction);
- Water Exposed Area three times daily (61% Fugitive Dust PM₁₀ reduction);
- Clean Paved Road (14% Fugitive Dust PM reduction).

Additional Mitigation Measures were applied in CalEEMod:

- Unpaved Road Mitigation: Limit on-site construction vehicle speeds to 5 mph.

Consistent with the above Mitigation Measures and parameters, Mitigation Measure 3.3-2 requires various dust control measures to be implemented during all construction activities. The City has reviewed the CalEEMod outputs, including the CalEEMod default assumptions (when utilized). The assumptions and inputs used in CalEEMod are consistent with the project description. No changes to the Draft EIR are required.

Response B-4: The commenter suggests that the City address whether the proposed new growth will be consistent with the latest Sacramento Area Council of Governments (SACOG) Metropolitan

Transportation Plan/Sustainable Communities Strategy (MTP/SCS). According to the NOP commenter letter submitted by SACOG regarding the project (May 15, 2017), the project area is not identified as an area for development by the MTP/SCS horizon year of 2036. Additionally, as noted in the NOP comment letter, SACOG will begin its quadrennial update of the plan next year (i.e., 2018), with a scheduled adoption year of 2020. SACOG will be working with the City of Davis to determine if there is a need to update the projections for the proposed project area for the next MTP/SCS. The full comment letter is included in Appendix A of the Draft EIR.

As noted in the NOP comment letter submitted by SACOG, the project is located in an area identified for future residential mixed use development. According to the SACOG Blueprint 2050 Preferred Alternative map, the project site is designated for Medium Density Mixed Residential.¹ The project would include the following proposed City General Plan designations: Residential Medium Density, Residential High Density, Neighborhood Mixed Use, Public/Semi-Public, and Urban Agricultural Transition Area. The project is consistent with the development type assumed for the project area by the SACOG Blueprint. Nevertheless, because the project area is not identified as an area for development by the MTP/SCS horizon year of 2036, the project is not consistent with the growth projections included in the MTP/SCS. The applicable air quality attainment plan for the project is the Yolo-Solano Air Quality Management District's *2016 Draft Triennial Assessment and Plan Update*. Because the project is not consistent with the growth projections included in the MTP/SCS, the project is not consistent with the *2016 Draft Triennial Assessment and Plan Update*.

The cumulative air quality analysis is included on pages 4.0-5 through 4.0-7 of Section 4.0, Other CEQA-Required Topics, of the Draft EIR. As discussed, cumulative project impacts associated with the region's air quality were determined to be cumulatively considerable and significant and unavoidable. Pages 4.0-5 and 4.0-6 of Section 4.0, Other CEQA-Required Topics, have been revised to clarify the language regarding consistency with the *2016 Draft Triennial Assessment and Plan Update* and the SACOG MTP/SCS. See Section 3.0, Revisions, of this Final EIR for the text revision.

The overarching goals of the MTP/SCS include: increasing the number of people (both residents and employees) who have access to high quality transit, developing a connected system of facilities that provide safe and convenient bicycle and pedestrian travel throughout the region, reduce congested travel, and create an efficient land use plan and robust transportation network that would meet Assembly Bill 32 goals and further reduce the region's impact on climate change. The proposed project would not conflict with these overarching goals. For example, the proposed project would reconstruct the existing bus stop located in the northwest quadrant of the West Covell Boulevard/Risling Court/Shasta Drive intersection. The project would introduce new residential land uses that are situated within walking distance of this new stop as well as the existing stop on the south side of West Covell Boulevard. Additionally, as discussed on pages 3.14-48 and 3.14-49 of the Transportation and Circulation section of the Draft EIR, the project would provide 4.5 miles of walking and bicycling facilities on- and off-site. Further, as required by Mitigation Measure 3.7-1, the project would be required to ensure that all of the residential units are designed such that they to achieve a minimum of 15% greater energy efficiency than the baseline 2016 Title-24 Energy Efficiency requirements (compliant with Tier 1 of the 2016 CalGreen Code). As required by Mitigation Measure 3.3-1, the project would also be required to incorporate various features which promote energy efficiency.

¹ Available at: https://www.sacog.org/sites/main/files/file-attachments/preferred_mapping11x17.pdf

No further response is necessary.

Response B-5: The commenter has included a list of operational mitigation comments and considerations presented for the City's consideration during review of the proposed project. The commenter notes that the District supports the project's proposed Bicycle and Pedestrian Safety Enhancement Program. The various electric vehicle and bicycle facility improvements have been provided to the Davis Planning Commission and City Council for their review and consideration. The City anticipates that some of the suggested additional measures will be included in the project's proposed Bicycle and Pedestrian Safety Enhancement Program, or as Conditions of Approval. However, it is noted that some identified improvements may not materially reduce air quality impacts, may conflict with City design standards, or may be infeasible. No changes to the Draft EIR are required.

Response B-6: This comment is noted. This comment serves as a conclusion to the comment letter and does not warrant a response. No further response is necessary.

De Novo Planning Group

Advanced Planning Group - Services and Environmental Team

**WEST DAVIS ACTIVE ADULT COMMUNITY PROJECT
PLANNING COMMISSION MEETING COMMENTS
WEDNESDAY JANUARY 10TH, 2018**

COMMENTS:

COMMENTS:

- Supports the project. Site has good opportunity, logical Urban Growth Boundary extension. Wants to ensure final project is correctly designed

COMMENTS:

- Concern over the University Retirement Community Expansion on the three-acre site. The 30 detached assisted living units are not consistent with what the URC was told would occur.
- Prefers three-story building with underground parking and enclosed facilities.
- Their proposal is more dense and impactful than what is proposed and analyzed. The Draft EIR should account for this.
- Will submit comments in writing.

COMMENTS:

- Check the UC Davis acreage – should be 5,000 acres, not 2,900 acres.
- Would prefer diagrams showing mitigation measures for traffic improvements to SR 113 Ramps.

1-1

1-2

1-3

Response to Letter 1: Public Comments During Planning Commission Meeting

Response 1-1: The commenter expresses support for the project and does not warrant a response. No further response is necessary.

Response 1-2: The commenter expresses concerns regarding the density of the project as well as the planned University Retirement Community (URC) expansion. As noted on page 2.0-4 of Chapter 2.0, Project Description, of the Draft EIR, the three-acre University Retirement Community expansion would be located in the southeastern corner of the project site. This expansion area would have up to 30 assisted living, age-restricted detached units. This would provide expansion opportunities for the University Retirement Community which is currently located directly south of the proposed expansion site, on the opposite side of Covell Boulevard. The existing University Retirement Community has remodeled and added onto their facility and is currently evaluating their expansion needs to meet the growing demand for their services.

The Draft EIR analyzes the potential impacts of implementation of the proposed project, which is described in detail in Chapter 2.0. The analysis is based on the assumed density and footprint described in the Project Description. No further response is necessary.

Response 1-3: The commenter notes that the acreage of the University of California, Davis (UCD) campus may be incorrect, and that the commenter prefers that mitigation for traffic improvements to the SR 113 Ramps be shown with diagrams. This comment is noted. Page 3.1-1 of Section 3.1, Aesthetics and Visual Resources, has been revised to clarify the language regarding the size of the UCD campus. See Section 3.0, Revisions, of this Final EIR for the text revision.

Impacts associated with the SR 113 Ramps are discussed on pages 3.14-44 through 3.14-47 of Section 3.14, Transportation and Circulation. Regarding the requested mitigation measure diagram for traffic improvements to the SR 113 Ramps, only one mitigation measure (Mitigation Measure 3.14-1) is required in order reduce impacts at the West Covell Boulevard / State Route (SR) 113 Northbound Ramps intersection and the West Covell Boulevard / Sycamore Lane intersection. This measure would the project applicant(s) to contribute fair share funding to cover their proportionate cost of the following intersection improvements:

- a) West Covell Boulevard/SR 113 NB Ramps – widen northbound off-ramp to consist of three lanes (i.e., one left, one shared left/through/right, and one right-turn lane) approaching West Covell Boulevard. The fair share funding shall be submitted to Caltrans.
- b) West Covell Boulevard/Sycamore Lane – lengthen eastbound left-turn lane from 150 to 275 feet. The fair share funding shall be submitted to the City of Davis.

The improvement to the West Covell Boulevard/SR 113 NB Ramps is a planned project in the 2016 Sacramento Area Council of Governments (SACOG) Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS). No official design work, including diagrams or other drawings, has been completed for this improvement at this stage.² Additionally, for informational purposes, a screenshot from the SimTraffic model illustrating the congestion on West Covell Boulevard, on the SR 113 NB off-ramp, and on Sycamore Lane under cumulative no project PM peak hour conditions is included on page 3.14-41 of Section 3.14. No further response is necessary.

² Personal communication with Rebecca Shafer, Fehr & Peers Transportation Engineer / Planner. March 28, 2018.

From: David Kutz <david.kutz@gmail.com>
 Sent: Sunday, December 24, 2017 1:44 PM
 To: Katherine Hess
 Subject: comment re: West Davis Active Adult Community project

Ms Hess,

You have been identified as the POC for input regarding the proposed WDAAC project.

My name is David Kutz; I own a house in Evergreen Meadows (1736 Portola Ct, Davis CA 95616). I am not representing or represented by any agency, but am providing comments as a concerned/potentially affected homeowner/citizen.

2-1

I have reviewed the proposed Conceptual Master Plan posted on the City of Davis website. If I understand the map correctly, the proposal shows that all traffic into/out of the entire development will funnel toward the existing intersection at Risling (Shasta on the south side of the intersection) and West Covell, with a second exit just a few yards west on W. Covell, just on the other side of the existing bus stop. Due to the existing roads around and through the Sutter Davis hospital complex to the east, it is very unlikely that traffic into/out of the proposed project would travel to the next major road/intersection (John Jones Rd), and there is no access to county road 99.

Given that the intersection of W Covell and Risling/Shasta is a major thoroughfare into many developments in West Davis, the additional traffic burden on this intersection will negatively impact accessibility and increase congestion, especially at "peak traffic" hours. As the intersection is the second just off the CA 113 overpass, back-up traffic getting onto/off the highway will likely result in gridlock. For tenants/occupants of the homes off Shasta (including URC, Adobe Apts, Aspen and Evergreen housing developments) who must turn left from Shasta onto W Covell, this will also significantly worsen traffic wait times. The presence of the bus stop between the two proposed entrance/exit routes onto W. Covell also slows traffic, which will exacerbate the slow-downs/potential gridlock at peak traffic times.

2-2

I propose several potential solutions to mitigate the increased traffic burden caused by the additional population in this project. Ideally, the project could incorporate more than one idea.

1. Instead of the second access point onto Covell (currently just to the west of the bus stop, and presumably directly across from the Dignity medical offices), redraw the map to move that road to the west of the bungalow courts/senior affordable apartments, placing the second road further west on Covell. Ideally, the new development could create an access point on the north side of the current Denali Drive intersection, which is currently a "T" intersection.
2. Create an east-west access road over the north end of the current Sutter Davis hospital property, allowing traffic to utilize John Jones Road without driving through the hospital parking lot.
3. Redrawing the proposed project map to move the current bus stop off of Covell, both improving roadway traffic at the Shasta/Risling intersection, and to improve bus access for residents in the new development. This does not have to significantly re-route the bus, just move the bus stop far enough off the street that the slowing bus does not negatively affect moving traffic along W. Covell Blvd.

Thank you for allowing me to express my concerns and provide feedback to the proposed project.

David L. Kutz

Response to Letter 2: David Kutz, Resident of Davis, California

Response 2-1: This comment is noted. This comment serves as an introduction to the comment letter and does not warrant a response. No further response is necessary.

Response 2-2: The commenter summarizes and lists several concerns regarding the proposed circulation improvements. The comment is noted. Potential impacts associated with project access, emergency vehicle access, and general circulation are addressed in Section 3.14, Transportation and Circulation, of the Draft EIR.

As noted on page 3.14-49 of the Draft EIR, the project would construct two vehicular accesses along West Covell Boulevard as well as several access points along Risling Court. Impacts associated with emergency vehicle access and project access were determined to be significant and unavoidable.

As noted on page 3.14-48 of the Draft EIR (Impact 3.14-7), the project would reconstruct the existing bus stop located in the northwest quadrant of the West Covell Boulevard/Risling Court / Shasta Drive intersection. Impacts associated with existing / planned transit services were determined to be less than significant.

Existing bus stops are located on the north side of Covell Boulevard, near the intersection with Risling Court (at southeast corner of project site), near the John Jones Road and Covell Boulevard intersection. On the south side of Covell Boulevard, a stop is located approximately 250 feet east of Risling Court. The existing bus stop on the north side of Covell Boulevard (near the intersection with Risling Court) would be relocated to align with the new street improvements; the existing bus turnout would be maintained. Westbound Covell Boulevard, east of Shasta Drive, would be modified to include a right turn lane for the right turn movements onto northbound Risling Court. These improvements would also alleviate some of the commenter's concerns.

The commenter suggests that the new roadway connection to West Covell Boulevard be constructed further from the existing West Covell Boulevard/Risling Court intersection to a new location opposite Denali Drive. It is noted that the proposed project cannot create an access point on the north side of the current Denali Drive / West Covell Boulevard intersection as the project applicant does not control the land at this intersection, which is located approximately 700 feet west of the western project boundary.

The commenter suggests that a new east-west access road be planned and built to the north of the Sutter Davis hospital property to allow traffic to access John Jones Road without driving through the hospital parking lot. The project applicant does not control the land north of Sutter Davis Hospital, and is therefore unable to construct such a connection. However, it is noted that Mitigation Measure 3.14-2 requires the applicant to work with Sutter Davis Hospital to obtain an easement for a future emergency vehicle access in this location.

The commenter suggests that the bus stop on the north side of West Covell Boulevard west of Risling Court instead be relocated off West Covell Boulevard. This is suggested as a means to minimize bus slowing effects on traffic operations along West Covell Boulevard. As part of the project, the relocated/upgraded bus stop on the north side of West Covell Boulevard would have a dedicated bus turnout lane. This type of lane is provided so that buses would not delay through traffic as they pick-up and drop-off passengers. Concepts associated with relocating the

bus stop within the project site or along Risling Court would need to be discussed with Unitrans and YoloBus. It is noted that this suggestion would likely be met with concern due to the potential for adverse effects to on-time service, as well as longer walk distances for bus riders working or residing south of West Covell Boulevard.

No further response is necessary.

My name is John Taylor and I'm a resident of University Retirement Community.

I'm concerned about the draft EIR description for possible expansion of URC into an approximately 3 acre parcel at the southeastern corner of the project site.

The Section 2.4 Project Overview description and the Land Use Summary Table 2.0-1 say the development "would likely consist of 30 assisted living detached units!"

This description is a sharp contrast to what Pacific Retirement Systems (the managing company for URC) has told URC residents.

In a meeting on October 9, 2017, Eric Sholte, PRS Vice President for Facilities, explained to a select group of URC residents and members of the Board of Directors that PRS had vetted several options. He said their choice was a large 3 story building with underground parking. He further said the facility would be self contained for meal, medical and activity needs to serve one floor of Memory Care residents and 2 floors for Assisted Living residents.

3-1

URC Residents do not want our Community to be broken up and our oldest and most vulnerable residents relocated to isolated lodging down the street and across a major thoroughfare. However, our suggestions for alternate concepts were not embraced by Management.

The PRS concept seems more substantial than the Draft EIR description of detached units, with greater density and a more substantial pattern of around the clock traffic demands. I hope this will be properly addressed in subsequent documents.

Thank you.

Response to Letter 3: Jeff Taylor, Resident of Davis, California

Response 3-1: The commenter expresses concerns regarding the description of the University Retirement Community (URC) expansion. As noted on page 2.0-4 of Chapter 2.0, Project Description, of the Draft EIR, the three-acre URC expansion would be located in the southeastern corner of the project site. This expansion area would have up to 30 assisted living, age-restricted detached units. This would provide expansion opportunities for the URC which is currently located directly south of the proposed expansion site, on the opposite side of Covell Boulevard. The existing URC has remodeled and added onto their facility and is currently evaluating their expansion needs to meet the growing demand for their services.

The Draft EIR analyzes the potential impacts of implementation of the proposed project, which is described in detail in Chapter 2.0. The analysis is based on the assumed density and footprint described in the Project Description. Should the ongoing coordination with the City and the ongoing public outreach process result in significant changes to the assumed uses, the City of Davis will determine if further analysis under CEQA is warranted or required. When an EIR has been certified for a project, Public Resources Code Section 21166 and CEQA Guidelines Sections 15162 and 15164 set forth the criteria for determining whether a subsequent EIR, subsequent negative declaration, addendum, or no further documentation be prepared in support of further agency action on the project.

These comments and suggestions have been provided to the Davis Planning Commission and City Council for their review and consideration. It is noted that the comment does not specifically address the adequacy of the Draft EIR. No further response is necessary.

From: Martha Teeter <mmteeter@ucdavis.edu>
 Sent: Monday, February 19, 2018 11:12 AM
 To: Katherine Hess
 Subject: West Davis Active Adult Draft EIR

Importance: High

Dear Ms. Hess,

I wanted to provide feedback to the Draft EIR for the West Davis Active Adult Community concerning several issues. | 4-1

1. Water: Besides swails as an eco-friendly practice, the community needs to use greywater in landscaping to improve sustainability, both in the public parts of the property and in the private. This use is permitted in Davis and there are examples of greywater usage currently as well. Please see Leslie Crenna's Water Wise data and I understand there is a draft ordinance for the city for new construction to use greywater. West Davis Active Adult needs to be a leader in this. | 4-2

2. Density: While I appreciate the addition of more units from the original plan, responding to the need for more housing density in Davis, there needs to be even more units and more affordable units in project with this acreage. This project should had at least 35% affordable units. And there should include considerable very low income units. Again, West Davis Active Adult needs to be a leader in this area. Limited income is frequently a problem for seniors and there is a great need in Davis for housing for seniors - I would say a critical need. This affordable housing should be integrated into the West Davis Active Adult community as well. | 4-3

Consideration should be given to micro-housing clusters of housing, looking beyond ADPs, such as Potters Lane. From the Future's Forum in Feb on housing, costs can be contained by building walls offsite (or in their case in Oregon) and assembling in Davis. This was done by Eric Roe, local developer, who spoke at the forum.

3. Transportation: The current location of the bus line on Covell does not fit well with the location of the community. I would suggest that developers work together with Unitrans to build an additional stop that could service both the West Davis Active Adult community and the Sutter Davis employees. This would overall reduce further the need for cars (and parking) and contribute to a welcoming atmosphere for the community. | 4-4

In sum, increase housing density (especially affordable), increase public transportation accessibility (with reduced need for cars and parking spaces), and more eco-friendly water system using greywater. | 4-5

Martha Teeter

2540 Bombadil Lane

530-792-7185

Davis resident since 2001

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Response to Letter 4: Martha Teeter, Resident of Davis, California

Response 4-1: This comment is noted. This comment serves as an introduction to the comment letter and does not warrant a response. No further response is necessary.

Response 4-2: The commenter suggests that the project, and the City as a whole, use greywater in landscaping. As noted on page 3.15-27 of Section 3.15, Utilities, a unique feature of the proposed project is the separation of indoor and outdoor demands. The on-site well, previously used for agricultural purposes, has the capacity to serve more water than is needed on-site. This well would be used to serve the landscaping demands of the project through a separate pipe system. The project will strive to use non-potable water from the onsite agricultural well, and the project could connect to a municipal recycled water system if and/or when it comes to fruition in the City.

The demand on the City's treatment and distribution system will be limited to the indoor demands. Alternatively, if the agricultural well only services the agricultural buffer, then the outdoor demands on the City's treatment and distribution system would slightly increase. In this case, the demand on the City's treatment and distribution system will be limited to the indoor demands and the non-agricultural buffer, outdoor demands.

It is also noted that the Water Conservation in Landscaping Act was enacted in 2006, requiring the Department of Water Resources (DWR) to update the Model Water Efficient Landscape Ordinance (MWELo). In 2009, the Office of Administrative Law (OAL) approved the updated MWELo, which required a retail water supplier or a county to adopt the provisions of the MWELo by January 1, 2010, or enact its own provisions equal to or more restrictive than the MWELo provisions.³ Because the City of Davis is a "local agency" under the MWELo, it must require "project applicants" to prepare plans consistent with the requirements of MWELo for review and approval by the City of Davis. The City of Davis is in compliance with this state law and uses the MWELo as written for projects within the City limits. This Water Supply Assessment (WSA) prepared for the project uses the methods described in the MWELo in setting landscaping irrigation limits.

These comments and suggestions have been provided to the Davis Planning Commission and City Council for their review and consideration. No changes to the Draft EIR are required.

Response 4-3: The commenter suggests increasing the number of residential units, particularly the number of affordable units, proposed by the project. The Draft EIR analyzes the potential impacts of implementation of the proposed project, which is described in detail in Chapter 2.0. The analysis is based on the assumed density and footprint described in the Project Description. As discussed on page 2.0-4 of Chapter 2.0, the project includes reservation of land for 150 affordable apartment units (or 26.8 percent of the total units) for seniors.

The proposed project has a total requirement to include 60 affordable units. Fifty-Seven of these affordable units must have rents affordable on average to households whose incomes do not

³ California Code of Regulations (CCR), Tit. 23, Div. 2, Ch. 27, Sec. 492.4. The MWELo provides the local agency discretion to calculate the landscape water budget assuming a portion of landscape demand is met by precipitation, which would further reduce the outdoor water budget. For purposes of the Water Supply Assessment, precipitation is not assumed to satisfy a portion of the outdoor landscape requirement because the determination of an appropriate effective precipitation factor is highly uncertain given the various landscape slopes, terrain composition, concurrent watering schedules, etc.

exceed 65 percent of the Yolo County median income. An additional three of these affordable units must have rents affordable to households whose incomes do not exceed 40 percent of the Yolo County median income.

At least 60 of the high-density units would meet the minimum income and rent targets above. However, based on currently available affordable housing subsidy funding, it is anticipated that approximately 35 percent of the units would be affordable to households whose incomes do not exceed 25 percent of the Yolo County median income, 35 percent of the units would be affordable to households whose incomes do not exceed 50 percent of the Yolo County median income, and 30 percent of the units would be affordable to households whose incomes do not exceed 60 percent of the Yolo County median income.

These comments and suggestions have been provided to the Davis Planning Commission and City Council for their review and consideration. It is noted that the comment does not specifically address the adequacy of the Draft EIR. No further response is necessary.

- Response 4-4:** The commenter suggests that the developer work with Unitrans to build an additional stop that could serve the proposed project and the Sutter Davis Hospital. As noted on page 3.14-48 of the Draft EIR (Impact 3.14-7), the project would reconstruct the existing bus stop located in the northwest quadrant of the West Covell Boulevard/Risling Court / Shasta Drive intersection. Impacts associated with existing / planned transit services were determined to be less than significant. As shown on Figure 3.14-3 in Section 3.14, two bus stops are currently located (about 625 feet apart) on the north side of West Covell Boulevard along the Davis Sutter Hospital and project site frontages (and one stop located on the south side of West Covell Boulevard). The concept of adding another stop would be unnecessary given the presence/proximity of these stops, and adding another stop could adversely effect on-time transit service.
- Response 4-5:** This comment is noted. This comment serves as a conclusion to the comment letter and does not warrant a response. See Responses 4-2, 4-3, and 4-4 regarding water, housing density, and public transportation accessibility, respectively. No further response is necessary.

From: Robin Whitmore <rlwhitmore2@gmail.com>
 Sent: Friday, January 05, 2018 8:32 PM
 To: Katherine Hess
 Subject: Re: West Davis Active Adult Community

Dear Katherine,

Thank you for the email about the upcoming commission meetings at which the West Davis Active Adult Community will be reviewed. I shared my concerns about this project with you and the mayor last spring, but I would appreciate it if my email could be included in the materials reviewed by the Commission members; I believe my email raises points relevant to each of the commissions. I hope to be able to review the EIR at the library this week and otherwise get up to speed on the status of the project. Perhaps I misunderstand the planning process, but how would the commissioners have had time to review the EIR, since I think it just came out two weeks ago, right in the middle of the holidays?

Thank you,

Robin Whitmore

On Wed, Apr 26, 2017 at 3:22 PM, Robin Whitmore <rlwhitmore2@gmail.com> wrote:
 Dear Katherine Hess,

I attended one of the first West Davis Active Adult Community local meetings and sent this response to Robb Davis afterward. I had hoped to attend the EIR scoping meeting today, but perhaps this email could act as a form of feedback about the proposed development.

Thank you,

Robin Whitmore

----- Forwarded message -----

From: Robin Whitmore <rlwhitmore2@gmail.com>
 Date: Thu, Mar 2, 2017 at 10:33 AM
 Subject: West Davis Active Adult Community
 To: rdavis@cityofdavis.org

Dear Mayor Davis:

I attended a recent information session with David and Justin Taormino and David Thompson about the proposed West Davis Active Adult Community. Based on what I heard there and what I subsequently read about this project, I have concerns that I hope the city will address in its deliberations. I send this communication to you because you will know who are the appropriate staff or commission members to read it. Please forward it accordingly.

Some of the assertions made by the WDAAC developer seem questionable to me; to wit:

--Seniors will buy these houses. As I understand it, 80% of the properties have to be occupied by seniors but not necessarily owned by them. This means that houses can be bought by anyone and rented to seniors. This arrangement seems to me like a very attractive investment for speculators and out-of-town landlords. Creating another rental market isn't a goal for our community. Is there a way to privilege owner-buyers? I doubt it.

--Davis people will buy these houses. The developer admitted that there is no way to give Davis folk precedence in

5-1

5-2

5-3

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sales. Davis is undoubtedly attractive to seniors from the region and the Bay Area as a retirement community. Yet I believe the city's goal is to facilitate "aging in place." for existing Davis folk, not a wide-open regional real estate market.

--Residents will walk to the "nearby" Marketplace shopping center. As a resident in this area, I can tell you this is incorrect: it's too far, too unpleasant, and most of all, too dangerous.

--Davis seniors want a retirement community. I can see the appeal to seniors of one-story housing but along with the much-touted single stories (more on that later) comes a homogenous neighborhood. Is there any evidence that this old-folks-only community would attract (or deter) senior buyers/renters? As a Boomer myself, it's hard for me to imagine many other Boomers wanting to live in a retirement community. The developer doesn't like the "Sun City" label, but it's really kind of an accurate description.

--Non-seniors will buy homes in a senior citizen community. The developer indicated that 20% of the homes would be "unrestricted", meaning available to occupants of all ages. Would younger people and families choose a neighborhood designed for and filled with older people? If they don't, the development becomes even more homogenous.

Here are my "big picture" concerns about this project:

This development puts seniors on the periphery of town, without good transportation options. The Unitrans buses that pass here are the perimeter lines which are not routed for visits to places seniors might frequent. There isn't a dedicated bus system such as the URC bus proposed for the development. A safe biking or walking connection (for the few seniors

likely to try to walk or ride their bikes anywhere from this distant location) would be a major infrastructure undertaking. Cars are the primary option, but as the occupants age, fewer of the residents will be able to drive. Even Mr.

Taormino noted that the location is "pretty far, in many respects."

Because this property would have to be annexed by the city, it would require another Measure J (R?) vote. Time, energy, money...

Why would we group seniors together in one part of town? URC is already a huge senior development in this area and apparently also has ambitions to build more facilities on the north side of Covell. Olympic Cottages and Glacier co-housing are also in this part of town. It seems to me it would be better for the city and for all of us to keep our neighborhoods age diverse rather than segregated. And the idea that it's a good location because it's next to the hospital is horrible.

What are the economic impacts of attracting more seniors to Davis? It seems like this would not expand the city's economic base. What are the cultural impacts of adding more seniors to the mix? It seems to me that Davis already has a sizable aging population, and that we might want to attract more middle-income young families. While we might wish it to be Davis folk who move to this new development and free their current homes for families, there is apparently nothing that can be done to restrict the buyers to seniors or the occupants to Davisites.

Mr. Taormino stated that he expects people to be in the market for these homes starting in their mid-sixties. Earlier in the presentation, however, he noted that people don't think of themselves as "seniors" until they're in their eighties. What we define as "senior" keeps moving up: no Boomer in their sixties that I know would even consider moving to a

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5-4

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retirement community like this. So, the neighborhood population could be considerably older than expected—perhaps seventies and eighties? It seems like this age group might need a lot more amenities: transportation, on-site services, in-home care, etc. beyond simply their independent homes.

5-5
cont'd

The developer's assertion that the homes are one story does not hold up under scrutiny. If I understood this correctly, the vast majority of the homes would be built with the structural requirements to "add" a second story over the garage. In addition, the garages will be built as an "expansion" living space. According to the developer, an 1800 sq foot one-story house with a two-car garage and a second story over the garage is 2600 square feet—a very sizable house, and not one-story. With this understanding, this development starts to look pretty much like all others in Davis. In addition, the custom homes that ring the property can be a full two stories I believe.

5-6

Is the restriction to senior-occupied housing for some limited period of time or forever? In other words, once this project is built and occupied by a first generation of folks, will it have to remain a senior community even as the number of seniors starts to decline after the Boomer population bulge? Being stuck with this kind of inflexible, restricted housing could be quite problematic and disadvantageous to the city in the long run.

5-7

Would there end up being more senior-owned and/or occupied homes than needed? As the developer noted, the unrestricted homes would naturally sell first, because of the flexibility for future sale or renting, so why wouldn't seniors buy these first? If seniors take up the unrestricted houses, is the demand for this type of senior housing then met with fewer total houses?

Does Davis Community Housing have the ability and financial wherewithal to pull off a low income housing project of this size—150 apartments? According to David Thompson's presentation, this is apparently twice the size of any they have built thus far, and would require them to obtain scarce and highly competitive grants from many different sources. It seems like there is a chance it might not come to fruition—and then what?

5-8

If the city is determined to annex and develop this parcel, this project is certainly better than, say, the gigantic business park proposed several years ago. But there is this to consider carefully: what is the value to us of a view? The sight of the Coast Range and the fields from Covell Blvd are the last big, open, public view toward the mountains from our city. Ironically, the tapestry behind the dais in the city council chambers celebrates this view—and we will lose this last bit of it if we develop north of Covell. Fields and mountains, big sky, snow, farms, sunsets and clouds, distant trees, the relief and beauty of open space—these don't have a monetary value, but they have immense value to my soul and surely to the souls of all of us who live here. Something of great value will be lost if we forever close our city off from this beauty with more streets and buildings. I'd like to think Davis is the kind of place where a view that nourishes our souls is valued enough to preserve it.

5-9

Thank you,

Robin Whitmore

Response to Letter 5: Robin Whitmore, Resident of Davis, California

- Response 5-1:** This comment is noted. This comment does not address the adequacy of the Draft EIR. It is noted that the Draft EIR was available for public review and comment from December 22, 2017 through February 20, 2018. No further response is necessary.
- Response 5-2:** This comment is noted. This comment serves as an introduction to the body of the comment letter and does not warrant a response. No further response is necessary.
- Response 5-3:** The commenter lists four concerns related to the ownership and occupancy characteristics of the project (i.e., owning versus renting, ensuring local ownership, and general comments regarding the age of the future occupants). The commenter also notes that the residents will not walk to the “nearby” Marketplace shopping center.

Impacts associated with pedestrian activity and pedestrian comfort is discussed throughout Section 3.14, Transposition and Circulation, of the Draft EIR. As discussed on pages 3.14-11 and 3.14-12, Pedestrian StreetScore+ refers to the measure of pedestrian comfort on sidewalks and paths. Figure 3.14-4b shows the StreetScore+ for key sidewalk corridors and intersection crossings near the project site. The StreetScore+ rating is based on the average score of all factors. A few factors contributing to a less comfortable environment for pedestrians include the lack of sidewalks adjacent to the project site, poor pavement quality along the shared-use path on the south side of West Covell Boulevard from Shasta Drive to John Jones Road, limited or no lighting on West Covell Boulevard, and the long crossing distance on the east leg of the West Covell Boulevard/Risling Court/Shasta Drive intersection. Figure 3.14-4b shows a generally comfortable walking environment along streets near the project site with developed frontage improvements. However, due to the lack of sidewalks, pedestrian travel along the project frontage of West Covell Boulevard and Risling Court is considered either very uncomfortable or impossible.

Additionally, as part of the project traffic analysis, pedestrian travel was observed at all study intersections. At the West Covell Boulevard / Risling Court / Shasta Drive intersection, the west leg (i.e., crossing of West Covell Boulevard) accommodated 33 pedestrians during the AM peak hour and 18 pedestrians during the PM peak hour. The other three legs accommodated fewer than 10 pedestrians per hour. The heavy pedestrian flow on the west leg was likely associated with persons traveling to/from the bus stop in the northwest quadrant of the intersection.

Impacts associated with pedestrian facilities are discussed in Impact 3.14-8 of Section 3.14. As discussed in this impact (and as shown in Figure 2.0-7, Bicycle and Pedestrian Facilities Map, of Chapter 2.0), the project would also construct a Class I bike trail that extends easterly from Risling Court to connect with facilities along John Jones Road. The project would also improve the condition of the West Covell Boulevard / Risling Court / Shasta Drive intersection by adding green bike lanes, upgraded sidewalks, and other features. The proposed bicycle and pedestrian facilities would eventually connect to planned future improvements within the vicinity of the project site, including a future bicycle and pedestrian overcrossing for SR 113 and John Jones Road that is being considered by the City of Davis. The proposed improvements would increase pedestrian comfort, and could provide alternative routes to the nearby Marketplace that do not currently exist.

Further, as defined by state law, the purpose of the EIR is specifically to address the potential for significant adverse environmental impact as a result of the project. Regarding social and economic impacts of projects, Section 15131(a) of the CEQA Guidelines indicates that, "Economic and social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes." In other words, economic and social changes are not, in themselves, considered under CEQA to be significant effects on the environment.

The City agrees there are many other important factors to consider during deliberations on this project, including community benefits and fiscal and financial outcomes. These comments, concerns, and suggestions have been provided to the Davis Planning Commission and City Council for their review and consideration.

Response 5-4: The commenter expresses concerns regarding the transportation options for the project. Please see Response 5-3 regarding the proposed pedestrian and bicycle connections which would be constructed as part of the project. Impacts associated with transit, bicycle, and pedestrian facilities are analyzed in Section 3.14, Transportation and Circulation, of the Draft EIR. The project would improve transit, bicycle, and pedestrian facilities within the project vicinity. As noted on page 3.14-48 of the Draft EIR (Impact 3.14-7), the project would reconstruct the existing bus stop located in the northwest quadrant of the West Covell Boulevard/Risling Court / Shasta Drive intersection. Impacts associated with existing / planned transit services were determined to be less than significant. Additionally, impacts associated with existing / planned bicycle and pedestrian services were determined to be less than significant.

Existing bus stops are located on the north side of Covell Boulevard, near the intersection with Risling Court (at southeast corner of project site), near the John Jones Road and Covell Boulevard intersection. On the south side of Covell Boulevard, a stop is located approximately 250 feet east of Risling Court. The existing bus stop on the north side of Covell Boulevard (near the intersection with Risling Court) would be relocated to align with the new street improvements; the existing bus turnout would be maintained. Westbound Covell Boulevard, east of Shasta Drive, would be modified to include a right turn lane for the right turn movements onto northbound Risling Court. These improvements would also alleviate some of the commenter's concerns.

As noted on pages 3.14-6 and 3.14-7, Unitrans Routes P & Q (Davis Perimeter) and Yobobus Routes 220 and 230 Express currently stop at the bus stop adjacent to the project site. All of the aforementioned routes provide transit options for the proposed residences to various stops throughout the City and region. For example, Unitrans Routes P & Q stops at the Department of Motor Vehicles, which is also located nearby other services (such as the U.S. Post Office). Routes P & Q also stop at Pole Line Road / Cowell Boulevard, which is adjacent to various amenities and destinations (such as grocery stores, restaurants, government services, retail, etc.). Further, as noted on page 3.14-7 of the Draft EIR, Yobobus Route 220 provides service to Davis, Winters, and Vacaville, and Route 230 Express provides service between West Davis and downtown Sacramento.

Response 5-5: The commenter notes general concerns regarding the project location, economic impacts of the senior aspect of the project, and proposed amenities. As discussed in Chapter 2.0 and

throughout the Draft EIR, for age-restricted units, the minimum age of (at least one) residents would typically be either 55 and older or 62 and older. The first project objective is to “Create a community that connects the City’s senior population to existing services and facilities in West Davis”. The project would include on-site services coordination staff that would facilitate appropriate health, educational and recreational activities, and supportive services for the residents of the high density portion of the project. The project also includes development of a dog park, tot lot, and Activity and Wellness Center for use by all residents.

As noted previously, the purpose of the EIR is specifically to address the potential for significant adverse environmental impact as a result of the project. The City agrees there are many other important factors to consider during deliberations on this project, including community benefits and fiscal and financial outcomes. These comments, concerns, and suggestions have been provided to the Davis Planning Commission and City Council for their review and consideration.

Response 5-6: The Draft EIR includes a complete and comprehensive analysis of potential impacts that may result from implementation of the proposed project, which is described in detail in Chapter 2.0 of the Draft EIR. The analysis contained throughout the Draft EIR addresses the project, as proposed, and discloses all significant and potentially significant impacts. Mitigation measures have been included in order to reduce significant impacts to the greatest degree feasible. It is also noted that the traffic analysis conducted for the Draft EIR was based on trip generation rates included in the 2012 Institute of Transportation Engineers (ITE) Trip Generation Manual. The ITE Trip Generation Manual includes trip rates which are based on housing unit type (single-family housing, multi-family housing, etc.).

While some future residents of the proposed project may include multigenerational family units, as described by the commenter, the project applicant is not specifically developing housing units that would be suitably only to multigenerational family living arrangements. The construction of “granny units” or accessory dwelling units is an allowable use for most single-family homes throughout Davis and the State of California. As is the case throughout most of Davis and the State, the majority of single-family homes do not include accessory dwelling units. The project does not propose to construct accessory dwelling units with the initial construction; however, the single-family homes would be constructed to allow the potential future addition of a room over the garages for a live-in caretaker, or other occupant. The total number of units in the project would not exceed the 560 dwelling units assumed in the Draft EIR. No changes to the Draft EIR are required in response to this comment. This comment has been forwarded to the Davis Planning Commission and City Council for their review and consideration.

Response 5-7: The proposed age-restricted units would remain in perpetuity. As discussed on pages 2.0-2 and 2.0-3 of Chapter 2.0, the proposed project identifies the following objectives:

- Create a community that connects the City’s senior population to existing services and facilities in West Davis.
- Design a neighborhood with homes to support an active lifestyle for older adults.
- Create a diverse community that provides housing for multiple generations and lifestyles by including a provision in the single-family neighborhood for 20% non-age restricted housing.
- Provide Davis residents with housing options that meets their long-term needs so they remain local rather than leave the City.
- Provide a community that is not isolated from the rest of the City by providing public gathering spaces for all City residents.

As discussed above, the purpose of the EIR is specifically to address the potential for significant adverse environmental impact as a result of the project. The City agrees there are many other important factors to consider during deliberations on this project, including owning versus renting, ensuring local ownership, and general comments regarding the age of the future occupants. These comments, concerns, and suggestions have been provided to the Davis Planning Commission and City Council for their review and consideration.

Response 5-8: The project proponents would be responsible for funding the project, as well as implementing and funding all required mitigation measures. Construction of the 150 affordable senior apartment homes is anticipated to occur in two 75-unit phases in order to ensure that local Davis residents are the primary market for occupancy. Construction of the affordable senior apartments would be phased in order to reach an aging Davis population over an extended period of time. The senior apartment homes concept drew inspiration from Eleanor Roosevelt Circle, an existing 60-unit affordable senior housing complex in east Davis developed in 2006.

Response 5-9: Impacts associated with aesthetics and viewsheds are discussed in Section 3.1, Aesthetics and Visual Resources. As discussed in Impact 3.1-1, The project site is not designated as a scenic vista by the City of Davis General Plan or the Yolo County General Plan, nor does it contain any unique or distinguishing features that would qualify the site for designation as a scenic vista. However, the City's General Plan EIR does note that development could block existing panoramic views.

The project site is highly visible from W. Covell Boulevard, Risling Court, and Shasta Drive. Implementation of the proposed project would change the existing visual character of the site from an undeveloped site to an urbanized site. Impacts related to a change in visual character are largely subjective and very difficult to quantify. People have different reactions to the visual quality of a project or a project feature, and what is considered "attractive" to one viewer may be considered "unattractive" to other viewers. The project site currently consists of undeveloped land previously used for agricultural purposes. Agricultural and vacant lands provide visual relief from urban and suburban developments, and help to define the character of a region. The loss of agricultural lands can have an adverse cumulative impact on the overall visual character and quality of a region.

As concluded on page 3.1-8 of the Draft EIR, the loss of the visual appearance of the existing vacant land on the site will change the visual character of the project site in perpetuity. Compliance with the City's site plan and architectural approval process would reduce visual impacts to the greatest extent feasible; however, the proposed project would permanently convert the undeveloped site to urbanized uses. As such, impacts associated with substantial degradation of the visual character of the project site would be significant and unavoidable. These comments and concerns have been provided to the Davis Planning Commission and City Council for their review and consideration.

February 12, 2018

Ms. Katherine Hess
 Community Development Administrator
 City of Davis
 Community Development and Sustainability Department
 23 Russell Boulevard, Suite 2
 Davis, California 95616

Khess@cityofdavis.org

Dear Ms. Hess,

Following are comments on the Draft Environmental Impact Report (DEIR) for the West Davis Active Adult Community (Project). We provided comments on the Scoping Document and have attended outreach meetings and meetings of the Planning Commission. Our comments are based on a review of the DEIR and information provided at these meetings and requirements in the California Environmental Quality Act.

6-1

Section 2.0 Project Description

The goals and objectives section states the objectives of the Project are to create a community that connects the City's senior population with services and facilities in West Davis, support an active lifestyle for older adults, provide housing for multi generational families, and provide Davis residents with housing that meet their long term needs. Are these goals consistent with the housing objectives outlined by the City of Davis or the Davis City Council? While these goals seem to be tailored for this Project as designed, it is not clear these are housing objectives that are consistent with the housing needs of the City of Davis. The Final Environmental Impact Report (FEIR) should explain in more detail how these objectives were developed.

6-2

The Project description fails to disclose the name of the Project applicants. We know from attending the scoping meeting there are three different applicants, or developers, of this project. While the DEIR states the University Retirement Community is considering developing up to 30 assisted living units, the developers of the remainder of the Project are not disclosed. From attending the scoping meeting we know the affordable senior apartments are being developed by another applicant, while the main section is being proposed by a third developer. It is important to be clear about the developers because they will be responsible for funding and completing the mitigation measures, and to ensure funding to complete the project. The City of Davis must assign the cost and completion of mitigation measures to the applicants, and the FEIR should clearly state how this will be accomplished and which applicant is responsible. It is not clear to us after attending several public meetings on this Project that all of the applicants have funding or have fully committed to develop their portion of the Project. The FEIR should provide details on the funding sources and level of commitment for each of the developers. We learned at a public meeting the development of the affordable apartments will require federal

6-3

funding to be completed. Are these federal funds still available and is the application for the funds competitive? If there is not funding for the affordable apartments how will the project objectives be met and what will happen to the land in this portion of the Project? Is the University Retirement Community fully committed to completion of their portion of the Project?

6-3
cont'd

At a public meeting the Project developer stated the single family homes will be built to allow the addition of a room over the garages for a live-in caretaker. Also, homes on the perimeter of the Project will be custom homes, of a size undefined. This information was not included in the DEIR - it is still part of the Project? The Project description does not describe or have details about any of the buildings for any of the three parts of the Project. Without stating the height, footprint, architectural detail, and construction materials used on the exterior of the buildings, the impacts of the Project cannot be evaluated.

6-4

The Project description includes a discussion of a 4.3 acre mixed use area located in the center of the Project. The DEIR states that the "...exact uses and facilities would be finalized thorough ongoing coordination with the City...". Uses described could include a health club or restaurant, both of which could increase traffic or create other impacts. Without a complete description of this mixed use area, the impacts of the Project cannot be evaluated. Deferring development of this aspect of the Project for the future is inconsistent with the requirements of California Environmental Quality Act.

6-5

The DEIR states the minimum age of residents could be 55 years or 62 years of age. The minimum age of residents for the age restricted units will have a significant impact on the analysis used in the DEIR. If a majority of the residents are 55, they are likely to still be working, which will change the analysis of traffic and other impacts. The DEIR used Rancho Yolo as a surrogate to determine traffic use for this proposed Project. There is significant uncertainty in the traffic use and the number of estimated trips that will be generated by this Project. The traffic impacts may have a range of values based on the average age of the residents.

6-6

Section 3.1 Aesthetics and Visual Resources

Impact 3.1-1 - The DEIR states the project will have a significant and unavoidable impact because of the loss of visual appearance of the existing vacant land and the site will change the visual character of the project site. As stated above, the DEIR never states the height and footprint of the buildings nor describes any construction details. We assume the affordable apartments will be three to four stories tall - similar to the University Retirement Community across West Covell from the Project. The design of the project places the largest structure - the affordable senior apartments - adjacent to West Covell Boulevard. While not included in the discussion of visual impacts, we assume this is the tallest structure in the development. The DEIR does not describe the impact of this large building on the views from the apartments at the University Retirement Community. The loss of views to the residents of the University Retirement Community is significant. Moving this structure to the north end of the development away from West Covell Boulevard would reduce the large visual impact. The FEIR should include an analysis of moving the affordable apartments away from West Covell Boulevard. The type of materials used in construction of the building can also determine the significance of the visual impacts. The DEIR does not provide any details concerning the visual appearance of the buildings.

6-7

Section 3.11 Noise and Vibration

In our scoping comments we asked that the impact of increased noise from emergency response vehicles be considered. We know from living near the Project that there are a large number of emergency calls to both the University Retirement Community and Atria Covell Gardens. As would be expected facilities that house older adults have a higher number of emergency calls. These calls result in a larger number of emergency response vehicles with sirens. Most emergency fire response will be from the station near the corner of Lake and Arlington Boulevards. The emergency vehicles travel north on Lake Boulevard and east on West Covell Boulevard. Residents along this corridor will experience an increase in noise from emergency response vehicles. The DEIR did not address this impact.

6-8

Section 3.13 Public Services and Recreation

Impact 3.13-1 - The DEIR states there is currently a deficit of firefighters within the City of Davis Fire Department and the Project will require 1.5 additional firefighters and the Davis City Council adopts a budget allocating resources to fire protection and establishes the service ration for each year. There is no assurance the Davis City Council will allocate resources to reduce the deficit of firefighter caused by the Project. Despite any assurance that the firefighter deficit will be mitigated, the DEIR states the proposed Project would have a less than significant impact to fire staffing. CEQA does not allow for the deferral of mitigation measures. The lead agency must provide measures to mitigate an impact or adopt a statement of overriding considerations. In this case it is feasible for the Project to provide funding for additional firefighting resources to reduce the impact to a level of less than significant. The City Council when approving the project could also allocate funding for additional firefighters but this must be included in the DEIR.

6-9

Impact 3.13-4 - In our scoping comments we asked that the impacts of the Project on the local schools be considered. The DEIR states the Project will result in 269 to 270 students for the Davis Joint Unified School District (DSJUD). Students from the Project would likely attend Patwin Elementary school which is currently below capacity. These students would also likely attend Emerson Junior High which is also below capacity. The Cannery development has only resulted in an increase of eight students to the DJUSD, so the estimates may be well in excess of actual numbers of K-12 students.

6-10

Impact 3.1.4.0 - In the scoping meetings and public meetings for the Project the applicant stated that the detached units would be designed to allow a second story addition for a live-in caretaker. This was not included in the Project description. If this were to be included in the Project the impact of live-in caretakers will need to be analyzed. These additions could also be used for housing for extended family members for rental rooms. These additional family members or caretakers will result in additional vehicle trips.

6-11

Impact 3.9-4 - We are concerned about the Projects impact on local flooding. During large storm events drainage ditches surrounding the proposed Project already are at capacity. The DEIR states the 100 year peak runoff from the Project will be 53.2 cubic feet per second (CFS) and a new retention basin will have a capacity of 5.75 acre-feet. The length of time the peak discharge will occur is not stated. A discharge of 53.2 CFS for one hour will result in 4.4 acre-

6-12

feet of water. A two hour storm event will create 8.8 acre-feet of water which will exceed the capacity of the retention basin. The FEIR must provide additional detail and calculations showing this Project will not cause flooding on West Covell Boulevard and nearby roads and residences.

6-12
cont'd

Section 4.0 Other CEQA - Related Topics

The cumulative impacts section does not include the Nishi and Downtown University Gateway Project or the Lincoln 40 Apartments. The Lincoln 40 Apartments will provide 130 units and Nishi will as proposed would include 2,200 beds. The impact of these reasonably foreseeable projects must be included in the cumulative analysis section of the FEIR.

6-13

Impact 4.14 - The cumulative impacts analysis to public services and recreation is inadequate. While this DEIR states this Project will have an impact on emergency services the cumulative impacts section states there will not be an impact because the City of Davis will require the payment of fair share fees for the expansion of public services. This analysis seems to conflict with Impact 3.13-1. How will this Project in addition to other Projects impact emergency services, transportation, parks, libraries, and schools?

6-14

Section 5.0 Alternatives to the Proposed Project

In our scoping comments we asked to consider an alternative for a non-age restricted development. This request was based on the lack of affordable housing in the City of Davis for families which has resulted in declining DJUSD enrollment. The alternatives section does not discuss how a non age restricted community will, or will not, meet the Project goals and objectives.

Under the analysis of this alternative the DEIR states there will be the same amount of housing. This needs to be clarified, without an affordable apartment structure there may be less total units under this alternative. The DEIR also states there will be a higher number of daily vehicle trips. This statement needs to be supported by evidence and facts. As stated above the DEIR did not include the trips resulting from caretakers, either live-in or daily, that will increase the number of trips. The DEIR states that under this alternative there will be a greater number of school age children which will result in an impact on schools. This contradicts impact 3.13-4 which states the impact to additional students is not significant. This addition of students is actually a benefit to the DJUSD that has been dealing with a reduction in students. More students increase school revenues and improve the economics of each of the schools. This information should be corrected in the FEIR.

6-15

Conclusion

We believe that the information in this DEIR is inadequate to evaluate the impacts of the proposed Project. The Project description and the goals and objectives provide the foundation for the analysis in a DEIR. The Project description in an EIR must contain an accurate, complete, and final Project description. In this DEIR the Project description is incomplete and the analysis of alternatives is also incomplete and incorrect. The goals and objectives appear to be tailored to this Project and not those adopted by the City of Davis to meet its housing needs. The California Code of Regulations, Title 14, section 15088.5 requires recirculation when a DEIR is fundamentally and basically inadequate in nature and public review and comment are

6-16

precluded. Because the Project description in this DEIR fails to provide any detail on the size, height, footprint, or construction details for the buildings, the impacts of the Project cannot be evaluated. In addition, the evaluation of the alternatives was cursory and incomplete. The DEIR needs a more thorough evaluation of a non-age restricted alternative. The City of Davis will need complete and detailed information to make a decision to approve or deny the Project.

6-16
cont'd

Thank you for the opportunity to provide comments on the DEIR. Please contact us if you have any questions or need additional detail on these comments.

Sincerely,

Russ Kanz and Toni Terhaar
2314 Isle Royale Lane
Davis, CA 95616

toniandruss@comcast.net

Response to Letter 6: Russ Kanz & Toni Terhaar, Residents of Davis, California

Response 6-1: This comment is noted. This comment serves as an introduction to the comment letter and does not warrant a response. No further response is necessary.

Response 6-2: The project objectives were developed by the project applicant. Project objectives and alternatives were presented to the City Council on June 6, 2017. The project objectives are consistent with several goals, standards, and policies included in the City's Housing Element. For example, Policy HOUSING 1.9 aims to encourage a variety of housing types and care choices, as well as housing innovation, for seniors. The proposed project includes greenway homes, bungalows, single family homes, cottages, senior affordable apartments, and condos, as well as an assisted-living component. Policy HOUSING 4.4 aims to encourage senior housing in all parts of Davis and near neighborhood centers, shopping centers, public transportation, and/or parks and greenbelts where compatible with existing uses. The proposed project is located near a shopping center and public transportation, and the project includes maintenance of a greenbelt as well as internal parks and trails. The project would be compatible with existing uses, such as the University Retirement Community and the Saratoga West Apartments located south of the project site. No further response is necessary.

Response 6-3: The comment expresses concerns regarding the project applicant disclosure and funding sources required to implement the project. As noted on page 3 of the Initial Study prepared for the project, which is included as Appendix A to the Draft EIR, the project applicant is David Taormino. The project applicant has applied for all entitlements and project approvals noted in the Draft EIR project description. As noted by the commenter, certain portions of the project (the University Retirement Community and the affordable housing component) may be developed and operated by other entities following project approval. Because planning entitlements run with the land, entitlements, mitigation measures, and baseline project features would continue to be applicable even if some or all of the property is transferred at a future time.

There are numerous mitigation measures included in the Draft EIR, which will require implementation and verification at various stages of the project. For example, some mitigation measures involve the payment of fees, while others relate to operational practices that must be implemented during site grading and/or construction activities. Compliance with the mitigation measures is the responsibility of the project applicant, or the applicant's designated representative (such as a contractor or builder in certain cases). The Mitigation Monitoring and Reporting Program (MMRP), which is included as Chapter 4.0 of this Final EIR, identifies the timing and verification responsibility for each mitigation measure.

In terms of funding mechanisms, under CEQA, an EIR should only consider direct and indirect physical effects of projects. Section 15064(d) of the CEQA Guidelines states that, "In evaluating the significance of the environmental effect of a project, the Lead Agency shall consider direct physical changes in the environment which is caused by and immediately related to the project." Section 15064(d)(3) further states that, "An indirect physical impact is to be considered only if that change is a reasonably foreseeable impact which may be caused by the project. A change which is speculative or unlikely to occur is not reasonably foreseeable." In addition, CEQA requires that a determination that a project may have a significant environmental effect must be based on substantial evidence (CEQA Guidelines §15064(f)).

On the secondary socioeconomic effects of projects, Section 15131(a) of the CEQA Guidelines indicates that, “Economic and social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes.” In other words, economic and social changes are not, in themselves, considered under CEQA to be significant effects on the environment, and it is not the role of the EIR to determine the financial status of a project applicant or identify specific funding sources and mechanisms.

The purpose of the EIR is specifically to address the potential for significant adverse environmental impact as a result of the project. The EIR does not evaluate the economic viability of a project or speculate on the likelihood that it will be built as proposed. The City agrees there are many other important factors to consider during deliberations on this project, including community benefits and fiscal and financial outcomes. These comments, concerns, and suggestions have been provided to the Davis Planning Commission and City Council for their review and consideration.

No changes to the Draft EIR are required in response to this comment.

Response 6-4: The Draft EIR includes a complete and comprehensive analysis of potential impacts that may result from implementation of the proposed project, which is described in detail in Chapter 2.0 of the Draft EIR. The analysis contained throughout the Draft EIR addresses the project, as proposed, and discloses all significant and potentially significant impacts. Mitigation measures have been included in order to reduce significant impacts to the greatest degree feasible. It is also noted that the traffic analysis conducted for the Draft EIR was based on trip generation rates included in the 2012 Institute of Transportation Engineers (ITE) Trip Generation Manual. The ITE Trip Generation Manual includes trip rates which are based on housing unit type (single-family housing, multi-family housing, etc.).

While some future residents of the proposed project may include multigenerational family units, as described by the commenter, the project applicant is not specifically developing housing units that would be suitable only to multigenerational family living arrangements. The construction of “granny units” or accessory dwelling units (ADUs) is an allowable use for most single-family homes throughout Davis and the State of California. As is the case throughout most of Davis and the State, the majority of single-family homes do not include accessory dwelling units.

Specifically, State law mandates that local governments ministerially permit ADUs in all single family residential zones and specifies certain development standards that facilitate their construction. (See 2017 Legislative Bills, Assembly Bill 494, Bloom and Senate Bill 229, Wieckowski). The legislative purpose for mandating ADUs within residential zones is to support an innovative, affordable, and effective option for adding much-needed housing. Consistent with state law, the Davis Municipal Code ministerially permits the construction of an ADU as an accessory use in nearly all zoning districts that contain residential development. (See generally, Davis Municipal Code, Chp. 40.) The requirement to allow for ministerial approval of ADUs is applicable to Planned Developments unless specifically stated otherwise (Davis Municipal Code 40.26.450(n)). The Preliminary Planned Development (PPD) zoning for the proposed project permits the construction of ADUs within the proposed single-family home sites. However, the

project does not mandate the construction of any ADUs in conjunction with the single family homes; rather, construction of such units are not prohibited by the PPD zoning. The area located above the garages of both the “greenway homes” and the “small-builder/custom homes” will be identified as the area of such homes appropriate for an ADU. The “bungalow homes” are the only product type that would allow for a stand-alone ADU. The age-restriction applicable to eighty percent of the single-family residential units would also apply to any rental unit located on a parcel so encumbered unless that unit were to be occupied by a caregiver.

In terms of the commenter’s concerns regarding height, footprint, architectural detail, and construction materials used on the exterior of the buildings, these details would be determined as part of the City’s design review process. The Draft EIR analyzes the potential impacts of implementation of the proposed project, which is described in detail in Chapter 2.0. The analysis is based on the assumed density and general footprint described in the Project Description. The residential design features and development standards will be elaborated upon and memorialized as part of the Final Planned Development (FPD), as specified in the PPD.

Pursuant to Mitigation Measure 3.1-1 in Section 3.1, Aesthetics and Visual Resources, the project would be required show that the use of reflective building materials that have the potential to result in glare that would be visible from sensitive receptors located in the vicinity of the project site would be prohibited. The City of Davis Department of Community Development and Sustainability would ensure that the approved project uses appropriate building materials with low reflectivity to minimize potential glare nuisance to off-site receptors.

The project would be subject to the policies and goals of the Davis General Plan, as well as the City’s site plan and architectural approval process. As described in Article 40.31.020 of the Davis Municipal Code, the purpose of the site plan and architectural approval process is to determine compliance with the Article and to promote the orderly and harmonious growth of the city and the stability of land values and investments and the general welfare; to help prevent the impairment or depreciation of land values and the development by the erection of structures, additions or alterations thereto without proper attention to siting, or of unsightly, undesirable or obnoxious appearance; and to prepare for and help to prevent problems arising affecting the community due to the nature of existing and planned uses of land and structures, such as traffic, public, safety, public facilities, utilities and services, among others.

Under Article 40.31.020 of the Davis Municipal Code, a site plan and architectural (design review) application shall be approved, conditionally approved, or denied by the Community Development and Sustainability Director, Planning Commission, or City Council. Such application may be approved only if the following findings are made:

- a) The proposed project is consistent with the objectives of the General Plan, complies with applicable zoning regulations, and is consistent with any adopted design guidelines for the district within which the project is located;
- b) The proposed architecture, site design, and landscape are suitable for the purposes of the building and the site and will enhance the character of the neighborhood and community;
- c) The architectural design of the proposed project is compatible with the existing properties and anticipated future developments within the neighborhood in terms of such elements as height, mass, scale, and proportion;
- d) The proposed project will not create conflicts with vehicular, bicycle, or pedestrian transportation modes of circulation; and

- e) The location, climate, and environmental conditions of the site are adequately considered in determining the use of appropriate construction materials and methods. Sufficient conditions are included with the approval to ensure the long-term maintenance of the project.

No changes to the Draft EIR are required in response to this comment. This comment has been forwarded to the Davis Planning Commission and City Council for their review and consideration.

Response 6-5: The commenter asserts that the uncertainty of specific uses in the mixed use area could increase traffic or create other impacts due to the lack of a complete description of uses.

The Draft EIR analyzes the potential impacts of implementation of the proposed project, which is described in detail in Chapter 2.0. The analysis is based on the assumed density and footprint described in the Project Description. As discussed in Chapter 2.0, Project Description, of the Draft EIR, the approximately 4.3-acre mixed use area would be located in the central portion of the project site and would be connected to the remainder of the site by greenway paths. The exact uses and facilities would be finalized through ongoing coordination with the City and the ongoing public outreach process. Current plans for the facility include a health club, restaurant, meeting rooms, and an outdoor swimming pool, all of which would be available for use by residents and the public. Additionally, attached, age-restricted units in this area are being evaluated for purposes of the EIR.

To address the current uncertainty of land uses that would be situated in the mixed use area, the Draft EIR (see Table 3.14-8, Project Trip Generation, on page 3.14-18 of Section 3.14) takes a conservative approach. The assumed health club and high-turnover sit-down restaurant uses are among the highest type of traffic generating (on a per acre or square foot basis) uses typically found in mixed use areas. By utilizing these land use assumptions in the traffic analysis, the analysis ensures that project traffic impacts are not understated. In other words, the upper range of potential traffic generated by the mixed use area was used in the overall project traffic analysis.

Should the ongoing coordination with the City and the ongoing public outreach process result in significant changes to the assumed uses (i.e., residential, health club, restaurant, meeting rooms, and an outdoor swimming pool) the City of Davis will determine if further analysis under CEQA is warranted or required. When an EIR has been certified for a project, Public Resources Code Section 21166 and CEQA Guidelines Sections 15162 and 15164 set forth the criteria for determining whether a subsequent EIR, subsequent negative declaration, addendum, or no further documentation be prepared in support of further agency action on the project.

No changes to the Draft EIR are required in response to this comment. This comment has been forwarded to the Davis Planning Commission and City Council for their review and consideration.

Response 6-6: The commenter suggests that it may not have been appropriate to use trip rates from the Rancho Yolo community as the basis for the proposed project's age-restricted residential trip generation due to potential differences in the age of residents. The website for the Rancho Yolo Community Association states that at least one resident of a household must be aged 55 or older, and all residents must be a spouse of the 55+ resident or at least 45 years old. Residency requirements at Rancho Yolo, therefore, are the same as those anticipated for the age-restricted units in the proposed project. It is acknowledged that resident age is one of many variables that can influence residential vehicle trip rates. However, other variables are also potentially (more)

influential, including household size, number of bedrooms, number of workers, vehicle ownership, and income. Frequently used resources, such as the Trip Generation Manual (ITE, 2012) do not use these types of demographic and socioeconomic variables because it is difficult, if not impossible, to measure such data when a given site is being counted (which ends up as the basis for the ITE trip generation database). In summary, the study approach is consistent with best practices of collecting multiple days of counts at a comparable facility when a proposed land use does not clearly fit within a given land use category contained in the Trip Generation Manual.

Response 6-7: Please see Response 6-4 regarding the City’s site plan and architectural (design review) process. Design of the future onsite structures has not been completed at this time, and as such, the specific design, colors, materials, and exact building heights are not known and cannot be analyzed in detail in this EIR. All future structures within the project site would be subject to compliance with all requirements of the Davis Municipal Code, including height limitations, setback requirements, building materials, etc.

As discussed in Impact 3.1-1, The project site is not designated as a scenic vista by the City of Davis General Plan or the Yolo County General Plan, nor does it contain any unique or distinguishing features that would qualify the site for designation as a scenic vista. However, the City’s General Plan EIR does note that development could block existing panoramic views.

The project site is highly visible from W. Covell Boulevard, Risling Court, and Shasta Drive. Implementation of the proposed project would change the existing visual character of the site from an undeveloped site to an urbanized site. Impacts related to a change in visual character are largely subjective and very difficult to quantify. People have different reactions to the visual quality of a project or a project feature, and what is considered “attractive” to one viewer may be considered “unattractive” to other viewers. The project site currently consists of undeveloped land previously used for agricultural purposes. Agricultural and vacant lands provide visual relief from urban and suburban developments, and help to define the character of a region. The loss of agricultural lands can have an adverse cumulative impact on the overall visual character and quality of a region.

As concluded on page 3.1-8 of the Draft EIR, the loss of the visual appearance of the existing vacant land on the site will change the visual character of the project site in perpetuity. Compliance with the City’s site plan and architectural approval process would reduce visual impacts to the greatest extent feasible; however, the proposed project would permanently convert the undeveloped site to urbanized uses. As such, impacts associated with substantial degradation of the visual character of the project site would be significant and unavoidable. It is noted that redesigning the project to move the University Retirement Community to the north end of the project would not reduce this significant and unavoidable impacts as the primary source of the impact is the change from vacant/agricultural uses to urban uses north of Covell Boulevard, and sensitive viewing receptors are also located north of the project site (i.e., in the Binning Farms community). These comments and concerns have been provided to the Davis Planning Commission and City Council for their review and consideration.

Response 6-8: Impacts associated with noise are discussed in Section 3.11, Noise and Vibration, of the Draft EIR. As discussed in Impacts 3.11-1 and 3.11-4, implementation of the proposed project would not substantially increase noise levels in the project vicinity. Operation noise resulting from the proposed project would not exceed the applicable City noise thresholds outlined in Section 3.11.

The sound exposure level (SEL) is a rating, in decibels, of a discrete event, such as an aircraft flyover or train passby, that compresses the total sound energy into a one-second event. Sirens from emergency response vehicles would fall into this noise category. As discussed on page 3.11-8, the City of Davis' noise thresholds for residential uses are measured in units of "L_{DN}", or the day/night average sound level. The L_{DN} is based upon the average noise level over a 24-hour day, with a +10 decibel weighing applied to noise occurring during nighttime (10:00 p.m. to 7:00 a.m.) hours. The nighttime penalty is based upon the assumption that people react to nighttime noise exposures as though they were twice as loud as daytime exposures. Because L_{DN} represents a 24-hour average, it tends to disguise short-term variations in the noise environment. Implementation of the project would not result in increased ambient or periodic noise levels which would exceed the City's L_{DN} noise threshold, and the project would not substantially increase noise levels at existing or proposed receptors.

No changes to the Draft EIR are required in response to this comment. This comment has been forwarded to the Davis Planning Commission and City Council for their review and consideration.

Response 6-9: Impacts to fire protection are analyzed in Section 3.13, Public Services and Recreation, of the Draft EIR. As stated on page 3.13-13, there would continue to be a deficit of firefighters regardless of the proposed project. This deficit is not a direct or indirect impact of the proposed project. Rather, fire protection service is evaluated and addressed annually on a city-wide level by the Davis City Council and Fire Chief. The City Council adopts an annual budget allocating resources to fire protection services, which effectively establishes the service ratio for that particular year. The annual budget is based on community needs and available resources as determined by the City Council and the Fire Chief. No changes to the Draft EIR are required in response to this comment.

Response 6-10: Impacts associated with schools are analyzed in Impact 3.13-4 on pages 3.13-15 and 3.13-16. As noted, because 86% of the proposed units would be age-restricted, the actual student generation resulting from the project would likely be significantly lower. Further, 30 of the units would be dedicated for assisted living. Therefore, the analysis in Impact 3.13-4 is considered very conservative.

It is the City's policy to require all development projects to adhere to the State's laws regarding the payment of school impact fees that are established in accordance with Education Code Section 17620 and Government Code Section 65995 *et seq.* and justified by the Davis Joint Unified School District (DJUSD) through its nexus study/fee justification efforts. The City will fully cooperate with the DJUSD, as they have in the past, in the collection of the school impact fees that have been established by DJUSD.

Response 6-11: See Response 6-4 regarding accessory dwelling units. As stated above, the total number of principal units in the project would not exceed the 560 dwelling units assumed in the Draft EIR. Therefore, it is appropriate to apply the ITE Trip Generation Rates to the project's traffic study, based on the range of housing unit types proposed by the project applicant. No changes to the Draft EIR are required in response to this comment. This comment has been forwarded to the Davis Planning Commission and City Council for their review and consideration.

Response 6-12: Impacts associated with flooding and stormwater are discussed in Section 3.9, Hydrology and Water Quality, of the Draft EIR. Specifically, Impact 3.9-4 on pages 3.9-21 and 3.9-22 discusses the project's potential to alter the existing drainage pattern in a manner which would result in

substantial erosion, siltation, flooding, or polluted runoff. The project is proposing 13.5 acres of open space/landscaping around the perimeter of and throughout the project site. The resulting 100-year peak discharge from the proposed development was estimated at 53.2 cubic feet per second (cfs), as stated in the comment.

Proposed mitigation for the pre-to-post increment in peak discharge would be accomplished by integrating an offsite detention storage with the project, with the design goal of limiting the site's post-development peak flow to existing levels. A detention basin approximately 450-feet by 150-feet with a maximum water depth of 3.4 feet (5.75 acre-feet) may be required.

This detention basin would be located offsite of the northeast of the project site adjacent to the existing City of Davis detention basin. The proposed detention basin would be located within the footprint of the proposed perimeter drainage channel. The depth of the detention basin would be approximately equivalent to the existing City detention basin.

During final design of the project, the final layout of the storm drain system and detention basins will be determined, the stage-storage relationship of the final design of the detention basins will be modeled, and detention outlet works will be sized. The size of the detention facilities would be based on complex engineering calculations, once detailed designs and plans are complete. Additionally, emergency outlet works will be sized to safely convey the 10-year un-detained storm event (assuming the 10-year detention storage volume is full when the peak 10-year flow arrives).

Additionally, Mitigation Measure 3.9-2 requires the applicant to submit a final stormwater and drainage plan identifying permanent stormwater control measures to be implemented by the project to the City. The plan would include measures consistent with the adopted guidelines and requirements set forth in the "Phase II Small MS4 General Permit, 2013-0001-DWQ," dated February 5, 2013 and shall be subject to review and approval by the Public Works Department. No further response is necessary.

Response 6-13: The commenter suggests that the Nishi and Downtown University Gateway Project or the Lincoln 40 Apartments Project should have been included in the cumulative analysis. Page 3.14-38 of the Draft EIR discusses why these projects were not included. As discussed, these projects were added to the City's travel demand model to determine how their inclusion would change travel demand in the West Covell Boulevard corridor. These tests revealed negligible changes in travel, which is to be expected given their land use types and location. Therefore, inclusion of these projects would not have altered any of the Draft EIR study conclusions related to transportation and circulation.

Response 6-14: The proposed project would not have a significant impact on emergency services, as stated in the comment. All impacts associated with public services and recreation, including fire protection and emergency services, were determined to be less than significant and/or less than cumulatively considerable. Please see Response 6-9.

Response 6-15: Alternatives to the proposed project are discussed in Chapter 5.0 of the Draft EIR. As noted on page 5.0-2 of this Chapter, the commenter suggested consideration of a non-age restricted alternative. Four alternatives to the proposed project were developed based on City of Davis staff and City Council input, input from the public during the NOP review period, and the technical analysis performed to identify the environmental effects of the proposed project. Under the Conventional (Non-Age Restricted) Alternative, the project site would be developed

similar to the proposed project with up to 560 units, but the units would not be age-restricted. The required affordable housing component would be provided on-site under this alternative, similar to the proposed project. The proposed amenities, mixed use area, bicycle and pedestrian improvements, and landscaping would be the same as the proposed project.

A discussion of the Conventional (Non-Age Restricted) Alternative's ability to meet the project objectives is included on pages 5.0-27 and 5.0-28 of the Draft EIR. As noted on these pages, the Conventional (Non-Age Restricted) Alternative would not meet the first two objectives, would partially meet the third objective, and would meet the fourth and fifth objectives.

According to the trip generation rates included in the 2012 ITE Trip Generation Manual, the amount of trips generated by non-age restricted units (such as the Conventional [Non-Age Restricted] Alternative) would be higher than for age-restricted units. The ITE Trip Generation Manual includes trip rates which are based on housing unit type (single-family housing, multi-family housing, etc.). For senior adult housing – detached (ITE Code 251), approximately 3.68 trips per day are anticipated. For (non-senior adult) detached housing (single family homes, ITE Code 210), approximately 9.52 trips per day are anticipated.

While additional students would likely be generated by the Conventional (Non-Age Restricted) Alternative, Appendix G of the CEQA Guidelines does not require analyzation of impacts associated with school revenues. Consistent with Appendix G of the CEQA Guidelines, the proposed project will have a significant impact on public services if it would result in:

Substantial adverse physical impacts associated with the provisions of new or physically altered government facilities, and/or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:

- *Fire Protection*
- *Police Protection*
- *Schools*
- *Parks*
- *Other public facilities*

Please also see Response 6-3 regarding CEQA's consideration of economic or social effects of a project. The purpose of the EIR is specifically to address the potential for significant adverse environmental impact as a result of the project. The City agrees there are many other important factors to consider during deliberations on this project, including community benefits and fiscal and financial outcomes. These comments, concerns, and suggestions have been provided to the Davis Planning Commission and City Council for their review and consideration.

Response 6-16: This comment is noted. This comment serves as a conclusion to the comment letter and summarizes the commenter's concerns regarding the project and Draft EIR analysis. Please see Responses 6-2, 6-3, 6-4, 6-5, and 6-7 (regarding the project description – including details on the size, height, etc. – and project objectives), and Response 6-15 (regarding the alternatives analysis). No further response is necessary.

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To:
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2.20.2018

Comments on the DRAFT EIR (DEIR) for the proposed West Davis Active Adult Community (WDAAC)

Dear Ms. Hess,

Please record and process the following comments.

Thank you,
Todd Edelman

In regards to 3.14.4 REGULATORY SETTING, and specifically TABLE 3.14-8: PROJECT TRIP GENERATION, it is clear that with a projected non-private automobile modal share 105 trips out of 3,691 trips (3,691 gross trips minus 200 internal trips), or 2.84%, the WDAAC *cannot fulfill*

- 1) The City of Davis General Plan, GOAL #2: The Davis transportation system will evolve to improve air quality, reduce carbon emissions, and improve public health by encouraging usage of clean, energy-efficient, active (i.e. human powered), and economically sustainable means of travel.", and;
- 2) The goal in the "City of Davis Comprehensive Bicycle Plan" for a bicycle modal share of at least 30% by 2020 (<http://cityofdavis.org/home/showdocument?id=979>, explicitly

7-1

stated on pages 6, 8, 10, 15, 77 and 80. (Full build out of WDAAC would be well after 2020, and the Bicycle Plan states on the above pages that 30% should be exceeded.)

For argument's sake let's assume that the 2.84% projection is about 50% bicycling (1.42% or slightly less than 1/15 of the 30% 2020 goal.) Special attention here must be placed on the term "evolve" in 1). It is not reasonable to consider approving a development with 1500% under the goal a realistic way that Davis will "evolve". Further, as it in the intention of the developer to bring residents to WDAAC from other areas of Davis - which are mathematically-speaking likely to be more proximate than is WDAAC to the denser services in the town's central area - it's probable that this is the opposite of evolution in regards to the mentioned improvement (air quality, etc.) as journeys by private automobile will increase.

7-1
cont'd

The details in the General Plan further emphasize this lack of evolution: In regards to "Performance Objective #2.2: Reduce vehicle miles traveled (VMT) 39 percent by 2035", a project with 97.16% private automobile share cannot contribute to this objective. In regards to "TRANS 1.6: Reduce carbon emissions from the transportation system in Davis by encouraging the use of non-motorized and low carbon transportation modes." special attention must be placed on the term "encouraging": It's reasonable to conclude that as the projected non-motorized share is so low, it's discouraged by the location of the proposed WDAAC itself.

7-2

The same direction in evolution is made clear in the Bicycle Plan: 1.42% is simply far short of the City's goal, which is - if this makes any difference - a very important one based on its multiple mentions in the Bicycle Plan. How can a 1.42% contribute in any meaningful way to increase the current overall level which is around 15 to 22% (based on statistics from 2010 <http://www.cityclock.org/urban-cycling-mode-share/>)?

It's unfortunately beyond the scope of this DEIR to show precisely - or show a range of - how much a new project must contribute to a specific goal for modal share, and also it's a significant problem that there are no goals for any other type of modal share, including, for example, based on age, ethnicity and gender. This lack of a link, a formula etc. which would indicate the clear responsibility of a project to contribute - or affect - the City of Davis's modal share goal of cycling is a significant omission, especially when the City's bodies calculate e.g. the financial impact of a proposed project. In sum this means that the modal share projections in the WDAAC DEIR can really only be assessed subjectively, which is the opposite of what a DEIR or EIR should do: Provide objective information. The City's bodies - the City Council, and the departments and commissions with development and transportation - should rectify this situation as soon as possible.

7-3

Response to Letter 7: Todd Edelman, Resident of Davis, California

Response 7-1: The commenter raises questions whether approval of the proposed project would preclude the City of Davis from achieving certain General Plan goals relating to the use of energy-efficient, active, and sustainable means of travel. Specifically, the commenter asks whether the project would allow the City to meet its goal of at least a 30 percent bicycle mode split by 2020, as described in the City of Davis Comprehensive Bicycle Plan. The commenter estimates that bicycling would represent 1.42 percent of the project's total trips based on the assumption that bicycling represents half of the 2.84 percent of external trips from Table 3.14-8.

The project's expected bicycle mode share would be greater than the commenter's estimate of 1.42 percent. As noted in footnote 4 of Table 3.14-8, the external bike/walk/transit trip reductions (105 daily trips, 9 AM peak hour trips, and 9 PM peak hour trips) apply only to those land uses whose trips are not based on empirical trip rate data collected at comparable Davis locations. As shown in Table 3.14-7, the Rancho Yolo Senior Community was observed to have a 7 percent AM peak hour and 4 percent PM peak hour mode split. An even greater bicycle mode split would be expected for the single-family non-age-restricted detached units due to the likelihood of travel to work and school by bicycle. The bicycle mode share estimate used in the EIR is conservative, to ensure that vehicle trips and their impacts are not under-estimated. Project features and amenities that will further encourage walking and bicycling include the transit hub as part of the mixed-use area, improvements to Covell Boulevard, and improvements the Shasta Drive/Risling Court intersection.

A recently updated version of the City of Davis base year travel demand model estimates that land uses within the City of Davis generate an estimated 662,700 daily vehicle trips. Table 3.14-8 shows that the project would generate 3,586 external daily vehicle trips. Thus, the project would represent about 0.5 percent of all vehicle trips currently made in the City and even less by 2020. Accordingly, the project's small size, when put in relation to the entire City for which these goals are applied, would have little impact on the overall outcome. This is similar to city or region vehicle-miles-travelled reduction targets in that not all projects equally help meet the goal, but the sum of all projects collectively does. In this instance, the proposed project includes a number of bicycle network enhancements, including new on-street and off-street facilities, to encourage active transportation modes.

Response 7-2: Please see Response 7-1.

Response 7-3: As stated in the comment, showing precisely how much a new project must contribute to a specific goal for modal share is beyond the scope of the Draft EIR. Please see Response 7-1.

This section includes minor edits and changes to the Draft EIR. These modifications resulted from responses to comments received during the public review period for the Draft EIR, as well as City staff initiated edits to clarify the details of the project.

Revisions herein do not result in new significant environmental impacts, do not constitute significant new information, nor do they alter the conclusions of the environmental analysis that would warrant recirculation of the Draft EIR pursuant to State CEQA Guidelines Section 15088.5.

In coordination with staff from the City of Davis, the project applicant team continues to make refinements and minor revisions to the site plan. None of these minor modifications to the proposed project would result in new significant impacts or mitigation measures, or increase the severity of an impact. The minor changes made to the site since the Draft EIR was released for public review are summarized below, under Section 3.1, Revisions to the Draft EIR.

Other minor changes to various sections of the Draft EIR are also shown below. These changes are provided in revision marks with underline for new text and ~~strike out for deleted text~~.

3.1 REVISIONS TO THE DRAFT EIR

1.0 INTRODUCTION

No changes were made to Section 1.0 of the Draft EIR.

2.0 PROJECT DESCRIPTION

No changes were made to Chapter 2.0 of the Draft EIR.

3.1 AESTHETICS AND VISUAL RESOURCES

The following changes were made to page 3.1-1 of Section 3.1 of the Draft EIR:

The City of Davis planning area is located 11 miles west of Sacramento and approximately 79 miles northeast of San Francisco. The planning area consists of approximately 160 square miles, and is characterized by agricultural/open space landscapes to the north, west, and south; highly developed urban landscapes within the City Limits; and open space lands, including the Yolo Bypass Wildlife Area to the east. Views from agricultural fields are enclosed on the west by the Coast Range hills. Views to other directions are open to the horizon, although the Sierra Nevada Mountains, Sutter Buttes, and Mount Diablo can be seen on clear days. The UC Davis campus is located adjacent to the southwest corner of the City and occupies a total of 5,300~~2,900~~ ~~unincorporated~~ acres.¹ General Plan land uses within the planning area include Residential (low, medium, medium-high, and high density); Neighborhood Retail; Community Retail; General Commercial; Business Park; Industrial; Public/Semi-Public; Parks and Recreation; Urban Agriculture Transition Areas; Agriculture; and Natural Habitat.

¹ University of California, Davis. UC Davis 2017 Long Range Development Plan Notice of Preparation – Environmental Impact Report. January 4, 2017.

3.0 REVISIONS

3.2 AGRICULTURAL RESOURCES

No changes were made to Section 3.2 of the Draft EIR.

3.3 AIR QUALITY

No changes were made to Section 3.3 of the Draft EIR.

3.4 BIOLOGICAL RESOURCES

The following changes were made to page 3.4-23 of Section 3.4 of the Draft EIR:

Mitigation Measure 3.4-5: *The project proponent shall implement the following measures to avoid or minimize impacts on Swainson's hawk:*

- *No more than 30 days before the commencement of construction, a qualified biologist shall perform preconstruction surveys for nesting Swainson's hawk and other raptors during the nesting season (February 1 through August 31), on and within a ½ mile radius of the project site.*
- *Appropriate buffers shall be established and maintained around active nest sites during construction activities to avoid nest failure as a result of project activities. The appropriate size and shape of the buffers shall be determined by a qualified biologist, in coordination with CDFW, and may vary depending on the nest location, nest stage, and construction activity. The buffers may be adjusted if a qualified biologist determines it would not be likely to adversely affect the nest. Monitoring shall be conducted to confirm that project activity is not resulting in detectable adverse effects on nesting birds or their young. No project activity shall commence within the buffer areas until a qualified biologist has determined that the young have fledged or the nest site is otherwise no longer in use.*
- *~~Before the commencement of construction, the project proponent shall provide 1:1 compensatory mitigation for the permanent loss of Swainson's hawk foraging habitat to the Yolo County HCP/NCCP JPA in accordance with its Swainson's Hawk Interim Mitigation Program. If this measure is implemented after adoption of the Yolo Natural Heritage Program, the project proponent shall comply with all requirements of the Yolo Natural Heritage Program. Prior to initiation of any ground disturbing activities, mobilization for construction, or the issuance of a grading permit or building permit, the applicant shall mitigate for the permanent loss Swainson's hawk foraging habitat on a per-acre basis. The acreage of Swainson's hawk foraging habitat which would be permanently lost as a result of the project shall be determined by the project applicant's qualified biologist. The results of this survey shall be submitted to the Yolo Habitat Conservancy for review and approval. Mitigation shall occur within Yolo County consistent with the Yolo Habitat Conservation Plan/Natural Community Conservation Pan ("Yolo HCP/NCCP). Mitigation shall ensure permanent 1:1 conservation of high-quality foraging habitat for the Swainson's hawk through a habitat conservation easement. Depending on project size, the following options are available:~~*

(a) For projects impacting less than 40 acres of Swainson’s hawk foraging habitat, mitigation shall be satisfied by participation in the Yolo Habitat Conservancy’s Swainson’s Hawk Interim Mitigation Fee Program. Eligible projects shall pay the Program in-lieu fee (currently \$8,660 per disturbed acre) to the Yolo Habitat Conservancy (“Conservancy”). Alternatively, projects impacting greater than 40 acres may mitigate pursuant to (b), below.

(b) For projects impacting 40 or more acres of foraging habitat, the applicant shall either (i) place a Conservancy-approved conservation easement on high-quality foraging habitat, (ii) purchase foraging habitat credits from a mitigation bank acceptable to the Conservancy and the California Department of Fish and Wildlife, or (iii) purchase foraging habitat credits from a mitigation bank acceptable to the Conservancy and the California Department of Fish and Wildlife, or (iii) purchase foraging habitat credits from a Conservancy-approved mitigation receiving site.

The following changes were made to page 3.4-32 of Section 3.4 of the Draft EIR:

~~**Mitigation Measure 3.4-12:** *Should the Yolo Natural Heritage Program (YNHP) be adopted prior to initiation of any ground disturbing activities for any phase of development associated with the project, the project applicant shall comply with the mitigation/conservation requirements of the YNHP, as applicable. The project applicant, the City of Davis Department of Community Development and Sustainability, and a representative from the YNHP JPA shall ensure that all mitigation/conservation requirements of the YNHP are adhered to prior to and during construction. To the extent there is duplication in mitigation for a given species, the requirements of the YNHP shall supersede. If this measure is implemented after adoption of the YNHP, the project proponent shall comply with all requirements of the YNHP. If the Yolo HCP/NCCP is adopted prior to initiation of any ground disturbing activities for any phase of development associated with the project, the project applicant shall comply with the requirements of the Yolo HCP/NCCP as applicable, which would likely replace other project mitigation measures for species covered in the Yolo HCP/NCCP. This would likely include the payment of fees, and the integration of applicable avoidance and mitigation measures for covered species. For species not covered by the Yolo HCP/NCCP, applicable mitigation measures in this EIR will continue to apply after adoption of the Yolo HCP/NCCP and must be satisfied by the project applicant. The project applicant, the City of Davis Department of Community Development and Sustainability, and a representative of the Yolo Habitat Conservancy shall coordinate to ensure compliance with the Yolo HCP/NCCP for covered species and satisfaction of applicable EIR mitigation measures for non-covered species. To the extent there is duplication in mitigation for a given species, the requirements of the Yolo HCP/NCCP shall supersede.*~~

3.5 CULTURAL AND TRIBAL RESOURCES

No changes were made to Section 3.5 of the Draft EIR.

3.6 GEOLOGY AND SOILS

No changes were made to Section 3.6 of the Draft EIR.

3.0 REVISIONS

3.7 GREENHOUSE GASES, CLIMATE CHANGE, AND ENERGY

No changes were made to Section 3.7 of the Draft EIR.

3.8 HAZARDS AND HAZARDOUS MATERIALS

No changes were made to Section 3.8 of the Draft EIR.

3.9 HYDROLOGY AND WATER QUALITY

No changes were made to Section 3.9 of the Draft EIR.

3.10 LAND USE

No changes were made to Section 3.10 of the Draft EIR.

3.11 NOISE AND VIBRATION

No changes were made to Section 3.11 of the Draft EIR.

3.12 POPULATION AND HOUSING

No changes were made to Section 3.12 of the Draft EIR.

3.13 PUBLIC SERVICES AND RECREATION

No changes were made to Section 3.13 of the Draft EIR.

3.14 TRANSPORTATION AND CIRCULATION

The analysis included in Section 3.14 of the Draft EIR analyzed the potential impacts resulting from implementation of the proposed project, as described in Section 2.0. Since the Draft EIR was released, the proposed circulation improvements to the West Covell Boulevard/Risling Court/Shasta Drive intersection have been revised in order to improve bicycle and pedestrian comfort. Fehr & Peers completed additional focused analysis of traffic operations at the West Covell Boulevard/Risling Court/Shasta Drive intersection as a result of the project revisions. The results of the focused analysis are summarized in a technical memorandum dated March 22, 2018. The following analysis is included in the memorandum (see Appendix A):

Background

The Draft EIR assumed that the westbound and northbound right-turns at the West Covell Boulevard/Risling Court/Shasta Drive intersection would continue to have channelized 'free-flow' right-turn lanes. Both corners currently include triangular raised medians with flared approach lanes. The northbound right-turn movement has a full-width acceleration lane departing the intersection, while the westbound right-turn movement has a minimal acceleration area. These designs allow motorists to perform these right-turn movements at a relatively high rate of speed, though they must yield to through traffic, when present.

Proposed Geometric Changes

Fehr & Peers analyzed the changes in traffic operations under various scenarios, assuming the following changes at the intersection (see Figure 3.0-1):

- Remove triangular raised median and convert westbound right-turn lane to a signal-controlled movement with a 150-foot turn pocket.
- Remove triangular raised median and restripe northbound through lane to be a shared through/right lane.
- Remove on-street bicycle lanes on Covell Boulevard through the intersection, and maintaining the existing off-street bicycle paths along the north and south sides of Covell Boulevard.

The intent of the modifications is to increase comfort and safety for pedestrian and bicyclists crossing to/from the proposed project, Sutter-Davis Hospital, and destinations south of Covell Boulevard by narrowing Covell Boulevard, to the extent feasible.

FIGURE 3.0-1: MODIFIED INTERSECTION



SOURCE: FEHR & PEERS, 2018.

3.0 REVISIONS

Operations Analysis Results

Fehr & Peers analyzed the operations associated with this modified intersection under Existing Plus Project, Cumulative Plus Project, and Cumulative Plus Project (Mitigated) conditions using the same micro-simulation modeling analysis employed in the Draft EIR. The Level of Service (LOS) results are shown in Tables 3.0-1 through 3.0-3. Delays would increase slightly, though operations would remain at an acceptable LOS C or better under all conditions. Additionally, no adjacent intersections would experience degraded operations as a result of the proposed modification. Therefore, the proposed geometric modifications would not cause any new significant intersection LOS impacts.

TABLE 3.0-1: PEAK HOUR INTERSECTION LOS – EXISTING PLUS PROJECT CONDITIONS

INTERSECTION	CONTROL	LEVEL OF SERVICE (LOS)			
		CHANNELIZED NORTHBOUND AND WESTBOUND RIGHT-TURNS		SIGNAL-CONTROLLED NORTHBOUND AND WESTBOUND RIGHT-TURNS	
		AM PEAK	PM PEAK	AM PEAK	PM PEAK
Covell Blvd. / Risling Ct. / Shasta Dr.	Signal	C	B	C	C

NOTE: THE CITY OF DAVIS LOS STANDARD IS "E".

SOURCE: FEHR & PEERS, 2018.

TABLE 3.0-2: PEAK HOUR INTERSECTION LOS – CUMULATIVE PLUS PROJECT CONDITIONS

INTERSECTION	CONTROL	LEVEL OF SERVICE (LOS)			
		CHANNELIZED NORTHBOUND AND WESTBOUND RIGHT-TURNS		SIGNAL-CONTROLLED NORTHBOUND AND WESTBOUND RIGHT-TURNS	
		AM PEAK	PM PEAK	AM PEAK	PM PEAK
Covell Blvd. / Risling Ct. / Shasta Dr.	Signal	C	C	C	C

NOTE: THE CITY OF DAVIS LOS STANDARD IS "E".

SOURCE: FEHR & PEERS, 2018.

TABLE 3.0-3: PEAK HOUR INTERSECTION LOS – CUMULATIVE PLUS PROJECT CONDITIONS WITH MITIGATION

INTERSECTION	CONTROL	LEVEL OF SERVICE (LOS)			
		CHANNELIZED NORTHBOUND AND WESTBOUND RIGHT-TURNS		SIGNAL-CONTROLLED NORTHBOUND AND WESTBOUND RIGHT-TURNS	
		AM PEAK	PM PEAK	AM PEAK	PM PEAK
Covell Blvd. / Risling Ct. / Shasta Dr.	Signal	C	C	C	C

NOTE: THE CITY OF DAVIS LOS STANDARD IS "E".

SOURCE: FEHR & PEERS, 2018.

Vehicular Queuing

Results from the micro-simulation modeling revealed the following conclusions regarding turn pocket storage adequacy at the West Covell Boulevard/Risling Court/Shasta Drive intersection:

- Westbound Right-Turn: Under Cumulative Plus Project conditions, the westbound right-turn lane is projected to have a maximum queue of 200 feet (i.e., eight vehicles) during both the AM and PM peak hours. However, this is caused by queued vehicles in the

westbound through lane blocking access to the right-turn pocket (see SimTraffic screenshot in Figure 3.0-2 below). This occurs infrequently and, therefore, does not warrant further lengthening of the right-turn lane. Queued vehicles would not occupy the entirety of the right-turn lane and spill out of the lane.

- **Northbound Right-Turn:** Under Cumulative Plus Project conditions, the shared northbound through/right-turn lane would have a maximum queue of 325 feet (i.e., 13 vehicles) during both the AM and PM peak hours. This queue would nearly spill back into the upstream University Retirement Community/Adobe Apartments driveway.

FIGURE 3.0-2: QUEUING ON WESTBOUND APPROACH OF COVELL BOULEVARD/RISLING COURT/SHASTA DRIVE UNDER CUMULATIVE PLUS PROJECT CONDITIONS WITH MODIFIED CONFIGURATION



SOURCE: FEHR & PEERS, 2018.

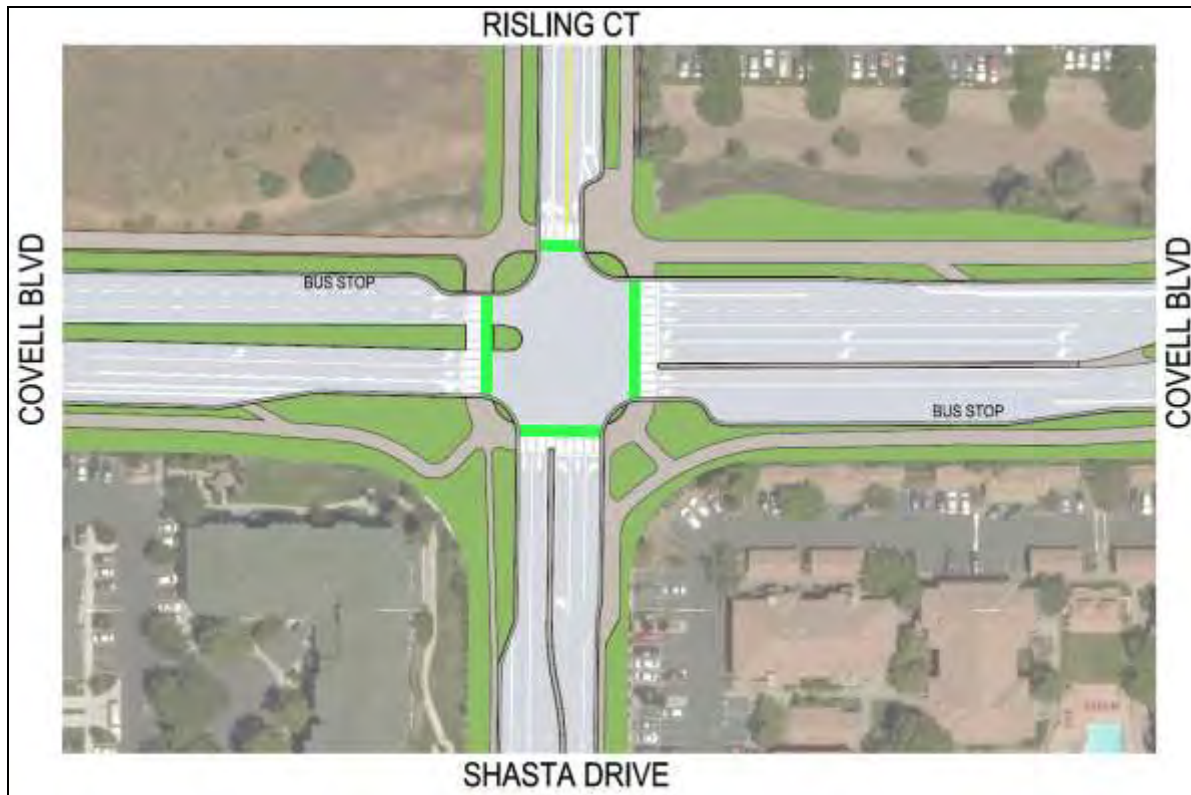
Vehicular Queuing

Figure 3.0-3 shows the most recent modification to the intersection design. This configuration maintains the same westbound right-turn lane configurations, but incorporates an exclusive northbound right-turn lane and restripes the northbound through lane to be a shared through/right lane.

The configuration shown in Figure 3.0-3 would accomplish the following objectives:

- The configuration would not worsen operations at a study intersection to an unacceptable level.
- Relative to the configuration in Figure 3.0-1, the modification would reduce queuing on the northbound approach by providing a dedicated right-turn lane.

FIGURE 3.0-3: REVISED INTERSECTION



SOURCE: FEHR & PEERS, 2018.

With respect to bicyclists, the configuration in Figure 3.0-3 offers several benefits over the configuration contemplated in the Draft EIR, including;

- Eastbound bicyclists on West Covell Boulevard would no longer have to merge with high-speed, free-flowing northbound right-turns. Instead, bicyclists travelling along West Covell Boulevard would utilize the existing Class I shared-use paths. Alternatively, more confident bicyclists may choose to ride within the West Covell Boulevard right-of-way.
- The removal of the triangular raised median in the westbound right-turn lane would slow right-turning vehicles and improve the bicycling environment on Risling Court.

3.15 UTILITIES

No changes were made to Section 3.15 of the Draft EIR.

4.0 OTHER CEQA-REQUIRED TOPICS

The following changes were made to pages 4.0-5 and 4.0-6 of Section 4.0 of the Draft EIR:

Impact 4.3: The project may contribute to cumulative impacts on the region's air quality (Cumulatively Considerable and Significant and Unavoidable)

The cumulative setting for air quality is the Davis Planning Area, as defined by the City of Davis General Plan, combined with the Paso Fino, 2860 West Covell Boulevard Building, Grande

Subdivision, Chiles Ranch, URC expansion, Sterling Apartments, Cannery (remainder of buildout) projects.

Cumulative Operational Emissions: Yolo County has a state designation of Nonattainment for ozone, particulate matter (PM₁₀ and PM_{2.5}), and is either Unclassified or Attainment for all other criteria pollutants. Yolo County has a national designation of Nonattainment for ozone, and PM₁₀, and Partial Nonattainment for PM_{2.5}. The County is designated either attainment or unclassified for all other criteria pollutants. Operational activities would increase emissions of reactive organic gasses (ROG), nitric oxide (NO_x), carbon monoxide (CO), and PM₁₀.

According to the NOP commenter letter submitted by SACOG regarding the project (May 15, 2017), the project area is not identified as an area for development by the MTP/SCS horizon year of 2036. Additionally, as noted in the NOP comment letter, SACOG will begin its quadrennial update of the plan next year (i.e., 2018), with a scheduled adoption year of 2020. SACOG will be working with the City of Davis to determine if there is a need to update the projections for the proposed project area for the next MTP/SCS. The full comment letter is included in Appendix A of the Draft EIR.

As noted in the NOP comment letter submitted by SACOG, the project is located in an area identified for future residential mixed use development. According to the SACOG Blueprint 2050 Preferred Alternative map, the project site is designated for Medium Density Mixed Residential.² The project would include the following proposed City General Plan designations: Residential Medium Density, Residential High Density, Neighborhood Mixed Use, Public/Semi-Public, and Urban Agricultural Transition Area. The project is consistent with the development type assumed for the project area by the SACOG Blueprint. Nevertheless, because the project area is not identified as an area for development by the MTP/SCS horizon year of 2036, the project is not consistent with the growth projections included in the MTP/SCS. The applicable air quality attainment plan for the project is the Yolo-Solano Air Quality Management District's 2016 Draft Triennial Assessment and Plan Update. Because the project is not consistent with the growth projections included in the MTP/SCS, the project is not consistent with the 2016 Draft Triennial Assessment and Plan Update.

The emissions model showed that ROG, NO_x, and PM₁₀ emissions are projected to exceed the Yolo-Solano Air Quality Management District (YSAQMD) threshold of significance. Mitigation Measure 3.3-1 is provided to reduce project-related operational emissions (area source and mobile source) for ROG, NO_x, and PM₁₀. The mitigation would bring operational emissions of ROG below the YSAQMD threshold of significance, but P PM₁₀ and NO_x would remain above the threshold. With incorporation of Mitigation Measure 3.3-1, the proposed project was determined to have a significant impact to operational emissions. As such, the proposed project would have a **cumulatively considerable** and **significant and unavoidable** impact on operational emissions.

² Available at: https://www.sacog.org/sites/main/files/file-attachments/preferred_mapping11x17.pdf.

3.0 REVISIONS

5.0 ALTERNATIVES TO THE PROPOSED PROJECT

No changes were made to Section 5.0 of the Draft EIR.

6.0 REPORT PREPARERS

No changes were made to Section 6.0 of the Draft EIR.

7.0 REFERENCES

No changes were made to Section 7.0 of the Draft EIR.

This document is the Final Mitigation Monitoring and Reporting Program (FMMRP) for the West Davis Active Adult Community Project (project). This FMMRP has been prepared pursuant to Section 21081.6 of the California Public Resources Code, which requires public agencies to “adopt a reporting and monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment.” A FMMRP is required for the proposed project because the EIR has identified significant adverse impacts, and measures have been identified to mitigate those impacts.

The numbering of the individual mitigation measures follows the numbering sequence as found in the Draft EIR.

4.1 MITIGATION MONITORING AND REPORTING PROGRAM

The FMMRP, as outlined in the following table, describes mitigation timing, monitoring responsibilities, and compliance verification responsibility for all mitigation measures identified in this Final EIR.

The City of Davis will be the primary agency responsible for implementing the mitigation measures and will continue to monitor mitigation measures that are required to be implemented during the operation of the project.

The FMMRP is presented in tabular form on the following pages. The components of the FMMRP are described briefly below:

- **Mitigation Measures:** The mitigation measures are taken from the Draft EIR in the same order that they appear in that document.
- **Mitigation Timing:** Identifies at which stage of the project mitigation must be completed.
- **Monitoring Responsibility:** Identifies the agency that is responsible for mitigation monitoring.
- **Compliance Verification:** This is a space that is available for the monitor to date and initial when the monitoring or mitigation implementation took place.

TABLE 4.0-1: MITIGATION MONITORING AND REPORTING PROGRAM

ENVIRONMENTAL IMPACT	MITIGATION MEASURE	MONITORING RESPONSIBILITY	TIMING	VERIFICATION (DATE/INITIALS)
AESTHETICS AND VISUAL RESOURCES				
<p>Impact 3.1-2: Project implementation may result in light and glare impacts</p>	<p>Mitigation Measure 3.1-1: <i>In order to reduce the potential for glare from buildings and structures within the project site, the Preliminary and Final Planned Developments for the project shall show that the use of reflective building materials that have the potential to result in glare that would be visible from sensitive receptors located in the vicinity of the project site shall be prohibited. The City of Davis Department of Community Development and Sustainability shall ensure that the approved project uses appropriate building materials with low reflectivity to minimize potential glare nuisance to off-site receptors.</i></p>	<p>City of Davis Department of Community Development and Sustainability</p>	<p>Prior to issuance of each building permit</p>	
AGRICULTURAL RESOURCES				
<p>Impact 3.2-1: Project implementation may result in the conversion of Prime Farmland, Unique Farmland, and Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural uses</p>	<p>Mitigation Measure 3.2-1: <i>Prior to initiation of grading activities for each phase of development of the project, the project applicant shall set aside in perpetuity, at a minimum ratio of 2:1 of active agricultural acreage, an amount equal to the remainder of the project site instead of at each phase. The agricultural land shall be elsewhere in the Davis Planning Area, through the purchase of development rights and execution of an irreversible conservation or agricultural easement, consistent with Section 40A.03.025 of the Davis Municipal Code. The location and amount of active agricultural acreage for the proposed project is subject to the review and approval by the City Council. The amount of agricultural acreage set aside shall account for farmland lost due to the conversion of the project site, as well as some of the off-site improvements, including but not necessarily limited to the off-site stormwater detention pond and the off-site Risling Court improvements. The amount of agricultural acreage set aside shall not include conversion of the agricultural buffer. The amount of agricultural acreage that needs to be set aside for off-site improvements shall be verified for each phase of the project during improvement plan review. Pursuant to Davis Code Section 40A.03.040, the agricultural mitigation land shall be comparable in soil quality with the agricultural land being changed to nonagricultural use. The easement land must conform with the policies and</i></p>	<p>City of Davis Department of Community Development and Sustainability City of Davis City Council</p>	<p>Prior to initiation of grading activities for each phase of development of the project</p>	

ENVIRONMENTAL IMPACT	MITIGATION MEASURE	MONITORING RESPONSIBILITY	TIMING	VERIFICATION (DATE/INITIALS)
	requirements of LAFCO including a LESA score no more than 10 percent below that of the project site.			
Impact 3.2-4: Project implementation may lead to the indirect conversion of adjacent agricultural lands to non-agricultural uses	Mitigation Measure 3.2-2: Prior to the issuance of occupancy permits, the applicant shall consult with adjacent agricultural property owners and attempt to purchase a “no aerial spray” easement. The applicant shall submit the written proof of the easement, or a statement indicated an agreement has not been reached to the Department of Community Development and Sustainability.	City of Davis Department of Community Development and Sustainability	Prior to the issuance of occupancy permits	
AIR QUALITY				
Impact 3.3-1: Project operations have the potential to cause a violation of any air quality standard or contribute substantially to an existing or projected air quality violation	Mitigation Measure 3.3-1: Prior to the issuance of each building permit, the project applicant shall ensure that the project incorporates the following mitigation: <ul style="list-style-type: none"> • Require the use Low VOC Cleaning Supplies during project operation • Require the use of low VOC Paint (VOC emission factor of below 100 g/L for residential interiors exteriors, and below 150 g/L for non-residential interior, non-residential exterior, parking). • Install metal halide post top lights, metal halide cobrahead/cutoff lights, LED lights, or high pressure sodium cutoff lights. • Require only the install low-flow appliances (for the bathroom faucet, kitchen faucet, toilet, and shower). • Require the use water-efficient irrigation systems. 	City of Davis Department of Community Development and Sustainability	Prior to issuance of each building permit	
Impact 3.3-2: Project construction has the potential to cause a violation of an air quality standard or contribute substantially to an existing or projected air quality violation	Mitigation Measure 3.3-2: The project applicant shall implement the following dust control measures during all construction activities. These measures shall be incorporated as part of the building and grading plans. <ul style="list-style-type: none"> • Water all active construction sites at least three times daily. Frequency should be based on the type of operation, soil, and wind exposure. • Apply water or dust palliatives on exposed earth surfaces as necessary to control dust emissions. Construction contracts shall include dust control treatment in late morning and at the end of the 	City of Davis Department of Community Development and Sustainability (for review and approval of each building permit) and	Prior to issuance of grading permits and during all site construction activities	

4.0

FINAL MITIGATION MONITORING AND REPORTING PROGRAM

ENVIRONMENTAL IMPACT	MITIGATION MEASURE	MONITORING RESPONSIBILITY	TIMING	VERIFICATION (DATE/INITIALS)
	<p>day, of all earth surfaces during clearing, grading, earth moving, and other site preparation activities. Non-potable water shall be used, where feasible. Existing wells shall be used for all construction purposes where feasible. Excessive watering will be avoided to minimize tracking of mud from the project onto streets as determined by Public Works.</p> <ul style="list-style-type: none"> Grading operations on the site shall be suspended during periods of high winds (i.e. winds greater than 15 miles per hour). Outdoor storage of fine particulate matter on construction sites shall be prohibited. Contractors shall cover any stockpiles of soil, sand and similar materials. There shall be no storage of uncovered construction debris for more than one week. Re-vegetation or stabilization of exposed earth surfaces shall be required in all inactive areas in the project. Cover all trucks hauling dirt, sand, or loose materials, or maintain at least two feet of freeboard within haul trucks. Apply non-toxic binders (e.g., latex acrylic copolymer) to exposed areas after cut and fill operations and hydroseed area (as applicable). Sweep streets if visible soil material is carried out from the construction site. Treat accesses to a distance of 100 feet from the paved road with a 6-inch layer of gravel. Reduce speed on unpaved roads to less than 5 miles per hour. 	<p>City of Davis Department of Public Works (for monitoring during all site construction activities)</p>		
BIOLOGICAL RESOURCES				
<p>Impact 3.4-1: Project implementation may result in direct or indirect effects on special-status invertebrate species</p>	<p>Mitigation Measure 3.4-1: The project proponent shall implement the following measures to avoid or minimize impacts on valley elderberry longhorn beetle:</p> <ul style="list-style-type: none"> All on-site elderberry shrubs shall be avoided and preserved on-site through site design, as feasible. All elderberry shrubs that are located adjacent to construction areas, but can be avoided, shall be fenced and designated as 	<p>City of Davis Department of Community Development and Sustainability and Public Works</p>	<p>Prior to issuance of grading permits and during all site construction activities</p>	

ENVIRONMENTAL IMPACT	MITIGATION MEASURE	MONITORING RESPONSIBILITY	TIMING	VERIFICATION (DATE/INITIALS)
	<p><i>environmentally sensitive areas. These areas shall be avoided by all construction personnel. Fencing shall be placed at least 20 feet from the dripline of each shrub, unless otherwise approved by USFWS.</i></p> <ul style="list-style-type: none"> <i>No insecticides, herbicides, or other chemicals that might harm the beetle or its host plant shall be used within 100 feet of the elderberry shrubs.</i> <i>If the shrub(s) cannot be avoided through redesign, as determined by the City of Davis Public Works Department in conjunction with the project applicant, the project applicant shall mitigate for potential impacts to the shrub(s) by either (1) purchasing VELB conservation credits from a USFWS-approved conservation bank, or (2) transplanting the individual shrub(s) that is not avoided to a suitable mitigation site in a manner consistent with the USFWS' 1999 Conservation Guidelines for the VELB. The mitigation shall be overseen by a qualified biologist, approved by the City of Davis Department of Community Development and Sustainability and USFWS.</i> 	<p>Department (for review and approval of the site design) and U.S. Fish and Wildlife Service (for approval of mitigation, if the shrubs cannot be avoided through redesign)</p>		
<p>Impact 3.4-2: Project implementation may result in direct or indirect effects on special-status reptile and amphibian species</p>	<p>Mitigation Measure 3.4-2: <i>The project proponent shall implement the following measures to avoid or minimize impacts on western pond turtle:</i></p> <ul style="list-style-type: none"> <i>Ground-disturbing activities in areas of potential pond turtle nesting habitat shall be avoided during the nesting season (April–August), to the extent feasible.</i> <i>A preconstruction survey for western pond turtles within aquatic habitats and adjacent suitable uplands to be disturbed by project activities shall be conducted by a qualified biologist. In aquatic habitats which may be dewatered during project construction, surveys shall be conducted immediately after dewatering and before any subsequent disturbance. Elsewhere, surveys shall be conducted within 24 hours before project disturbance.</i> <i>If pond turtles are found during preconstruction surveys, a qualified biologist, with approval from CDFW, shall move the turtles to the nearest suitable habitat outside the area subject to project disturbance. The construction area shall be reinspected whenever a lapse in construction activity of 2 weeks or more has occurred.</i> 	<p>City of Davis Department of Community Development and Sustainability (for review and approval of the site design and pre-construction surveys) and California Department of Fish and Wildlife (for approval of turtle moving,</p>	<p>Prior to issuance of grading permits and during all site construction activities</p>	

ENVIRONMENTAL IMPACT	MITIGATION MEASURE	MONITORING RESPONSIBILITY	TIMING	VERIFICATION (DATE/INITIALS)
	<ul style="list-style-type: none"> • Construction personnel performing activities within aquatic habitats and adjacent suitable uplands to be disturbed by project activities shall receive worker environmental awareness training from a qualified biologist to instruct workers to recognize western pond turtle, their habitats, and measures being implemented for its protection. • Construction personnel shall observe a 15-miles-per-hour speed limit on unpaved roads. <p>Mitigation Measure 3.4-3: The project proponent shall implement the following measures to avoid or minimize impacts on giant garter snake:</p> <p>The project proponent shall consult with USFWS regarding the potential for the project to affect giant garter snake habitat. If USFWS determines that giant garter snake may be potentially affected by project construction, the project proponent shall obtain an incidental take permit from USFWS and implement the minimization guidelines for giant garter snake, as follows:</p> <ul style="list-style-type: none"> • Unless authorized by USFWS, construction and other ground-disturbing activities within 200 feet of suitable aquatic habitat for the giant garter snake shall not commence before May 1, with initial ground disturbance expected to correspond with the snake's active season. Initial ground disturbance shall be completed by October 1. • To the extent possible, construction activities shall be avoided within upland habitat within 200 feet from the banks of giant garter snake aquatic habitat. Movement of heavy equipment in these areas shall be confined to existing roadways, where feasible, to minimize habitat disturbance. • Construction personnel shall receive USFWS-approved worker environmental awareness training to instruct workers to recognize giant garter snake and their habitats. • Within 24 hours before construction activities, the project area shall be surveyed for giant garter snake. The survey shall be repeated if a lapse in construction activity of 2 weeks or greater has occurred. If a giant garter snake is encountered during construction, activities shall cease until appropriate corrective 	<p>if the turtle is found during the surveys)</p> <p>City of Davis Department of Community Development and Sustainability (for review and approval of construction surveys) and U.S. Fish and Wildlife Service (for consultation and determination)</p>	<p>Prior to issuance of grading permits and during all site construction activities</p>	

ENVIRONMENTAL IMPACT	MITIGATION MEASURE	MONITORING RESPONSIBILITY	TIMING	VERIFICATION (DATE/INITIALS)
	<p>measures have been completed or it is determined by the qualified biologist and City staff, in coordination with USFWS and CDFW, that the giant garter snake shall not be harmed. Any sightings or incidental take shall be reported to USFWS and CDFW immediately.</p> <ul style="list-style-type: none"> Any aquatic habitat for the snake that is dewatered shall remain dry for at least 15 consecutive days after April 15 and before excavating or filling of the dewatered habitat. If complete dewatering is not possible, potential snake prey (e.g., fish and tadpoles) will be removed so that snakes and other wildlife are not attracted to the construction area. Giant garter snake habitat to be avoided within or adjacent to construction areas will be fenced and designated as environmentally sensitive areas. These areas shall be avoided by all construction personnel. 			
<p>Impact 3.4-4: Project implementation may result in direct or indirect effects on special-status bird species</p>	<p>Mitigation Measure 3.4-4: The project proponent shall implement the following measure to avoid or minimize impacts on western burrowing owl:</p> <ul style="list-style-type: none"> No less than 14 days before initiating ground disturbance activities, the project proponent shall complete an initial take avoidance survey using the recommended methods described in the Detection Surveys section of the March 7, 2012, CDFW Staff Report on Burrowing Owl Mitigation (CDFW 2012). Implementation of avoidance and minimization measures (as presented in the March 7, 2012, CDFW Staff Report on Burrowing Owl Mitigation) would be triggered if the initial take avoidance survey results in positive owl presence on the project site where project activities shall occur. If needed, the development of avoidance and minimization approaches shall be developed in coordination with CDFW. <p>Mitigation Measure 3.4-5: The project proponent shall implement the following measures to avoid or minimize impacts on Swainson’s hawk:</p> <ul style="list-style-type: none"> No more than 30 days before the commencement of construction, a qualified biologist shall perform preconstruction surveys for nesting Swainson’s hawk and other raptors during the nesting season (February 1 through August 31). Appropriate buffers shall be established and maintained around 	<p>City of Davis Department of Community Development and Sustainability (for review and approval of survey) and U.S. Fish and Wildlife Service (for coordination)</p> <p>City of Davis Department of Community Development and Sustainability (for review and approval of</p>	<p>No less than 14 days before initiating ground disturbance activities</p> <p>No less than 30 days before start of construction, during all site construction activities, and prior to</p>	

ENVIRONMENTAL IMPACT	MITIGATION MEASURE	MONITORING RESPONSIBILITY	TIMING	VERIFICATION (DATE/INITIALS)
	<p><i>active nest sites during construction activities to avoid nest failure as a result of project activities. The appropriate size and shape of the buffers shall be determined by a qualified biologist, in coordination with CDFW, and may vary depending on the nest location, nest stage, and construction activity. The buffers may be adjusted if a qualified biologist determines it would not be likely to adversely affect the nest. Monitoring shall be conducted to confirm that project activity is not resulting in detectable adverse effects on nesting birds or their young. No project activity shall commence within the buffer areas until a qualified biologist has determined that the young have fledged or the nest site is otherwise no longer in use.</i></p> <ul style="list-style-type: none"> • <i>Prior to initiation of any ground disturbing activities, mobilization for construction, or the issuance of a grading permit or building permit, the applicant shall mitigate for the permanent loss Swainson’s hawk foraging habitat on a per-acre basis. The acreage of Swainson’s hawk foraging habitat which would be permanently lost as a result of the project shall be determined by the project applicant’s qualified biologist. The results of this survey shall be submitted to the Yolo Habitat Conservancy for review and approval. Mitigation shall occur within Yolo County consistent with the Yolo Habitat Conservation Plan/Natural Community Conservation Pan (“Yolo HCP/NCCP”). Mitigation shall ensure permanent 1:1 conservation of high-quality foraging habitat for the Swainson’s hawk through a habitat conservation easement. Depending on project size, the following options are available:</i> <ul style="list-style-type: none"> <i>(a) For projects impacting less than 40 acres of Swainson’s hawk foraging habitat, mitigation shall be satisfied by participation in the Yolo Habitat Conservancy’s Swainson’s Hawk Interim Mitigation Fee Program. Eligible projects shall pay the Program in-lieu fee (currently \$8,660 per disturbed acre) to the Yolo Habitat Conservancy (“Conservancy”). Alternatively, projects impacting greater than 40 acres may mitigate pursuant to (b), below.</i> <i>(b) For projects impacting 40 or more acres of foraging habitat, the applicant shall either (i) place a Conservancy-approved conservation easement on high-quality foraging habitat, (ii)</i> 	<p>surveys), California Department of Fish and Wildlife (for coordination), and Yolo Habitat Conservancy (for review of the foraging habitat survey)</p>	<p>initiation of any ground disturbing activities, mobilization for construction, or the issuance of a grading permit or building permit</p>	

ENVIRONMENTAL IMPACT	MITIGATION MEASURE	MONITORING RESPONSIBILITY	TIMING	VERIFICATION (DATE/INITIALS)
	<p><i>purchase foraging habitat credits from a mitigation bank acceptable to the Conservancy and the California Department of Fish and Wildlife, or (iii) purchase foraging habitat credits from a mitigation bank acceptable to the Conservancy and the California Department of Fish and Wildlife, or (iii) purchase foraging habitat credits from a Conservancy-approved mitigation receiving site.</i></p> <p>Mitigation Measure 3.4-6: <i>The project proponent shall implement the following measure to avoid or minimize impacts on other protected bird species that may occur on the site:</i></p> <ul style="list-style-type: none"> <i>Preconstruction surveys for active nests of special-status birds shall be conducted by a qualified biologist in all areas of suitable habitat within 500 feet of project disturbance. Surveys shall be conducted within 14 days before commencement of any construction activities that occur during the nesting season (February 15 to August 31) in a given area.</i> <i>If any active nests, or behaviors indicating that active nests are present, are observed, appropriate buffers around the nest sites shall be determined by a qualified biologist to avoid nest failure resulting from project activities. The size of the buffer shall depend on the species, nest location, nest stage, and specific construction activities to be performed while the nest is active. The buffers may be adjusted if a qualified biologist determines it would not be likely to adversely affect the nest. If buffers are adjusted, monitoring will be conducted to confirm that project activity is not resulting in detectable adverse effects on nesting birds or their young. No project activity shall commence within the buffer areas until a qualified biologist has determined that the young have fledged or the nest site is otherwise no longer in use.</i> 	<p>City of Davis Department of Community Development and Sustainability (for review and approval of surveys)</p>	<p>Within 14 days before start of construction activities that occur during nesting season (Feb. 15 to Aug. 31), and during all site construction activities</p>	
<p>Impact 3.4-6: Project implementation may result in direct or indirect effects on candidate, sensitive, or special-status plant species</p>	<p>Mitigation Measure 3.4-8: <i>Prior to construction, the project proponent shall retain a biologist to perform a focused survey for the following CNPS listed plants: heartscale (April to October), brittlescale (April to October), San Joaquin spearscale (April to October), recurved larkspur (March to June), and saline clover (April to June). The survey shall be performed during the floristic season (shown in parenthesis). While there is a low potential for</i></p>	<p>City of Davis Department of Community Development and Sustainability</p>	<p>Prior to construction and during the floristic seasons</p>	

ENVIRONMENTAL IMPACT	MITIGATION MEASURE	MONITORING RESPONSIBILITY	TIMING	VERIFICATION (DATE/INITIALS)
	<p><i>these species to be found on the project site, there is some limited habitat present within and along the fringe of the irrigation ditches. If any of these plants are found during the focused survey, the project proponent shall contact the CNPS to obtain the appropriate avoidance and minimization measures.</i></p> <p>Mitigation Measure 3.4-9: <i>Prior to construction, the project proponent shall retain a biologist to perform a focused survey for the federally and state listed palmate-bracted salty bird's-beak (<i>Chloropyron palmatum</i>). The survey shall be performed during the floristic season (generally May through October). This species is generally restricted to seasonally-flooded, saline-alkali soils in lowland plains/basins, which is generally present within and along the fringe of the irrigation ditches. If this plant is found during the focused survey, the project proponent shall contact the USFS and CDFW to obtain the appropriate avoidance and minimization measures.</i></p>	<p>(for review and approval of surveys)</p> <p>City of Davis Department of Community Development and Sustainability (for review and approval of survey) and U.S. Forest Service and California Department of Fish and Wildlife (if the species is found during the survey)</p>	<p>Prior to construction</p>	
<p>Impact 3.4-7: The proposed project has the potential to effect protected wetlands and jurisdictional waters</p>	<p>Mitigation Measure 3.4-10: <i>The project proponent shall implement the following measure to avoid or minimize impacts on potentially jurisdictional waters:</i></p> <ul style="list-style-type: none"> • <i>Before any activities that would result in discharge, fill, removal, or hydrologic interruption of any of the water features within the project site, a wetland delineation and jurisdictional determination shall be conducted by a qualified delineator and the delineation that determines the extent of jurisdictional waters should be approved by USACE.</i> • <i>Any impacts on jurisdictional features shall obtain the appropriate CWA Section 404 and or 401 permits. All permit conditions including required avoidance, minimization, and mitigation</i> 	<p>U.S. Army Corps of Engineers (for review and approval of delineation)</p>	<p>Before any activities that would result in discharge, fill, removal, or hydrologic interruption of any of the water features within the project site</p>	

ENVIRONMENTAL IMPACT	MITIGATION MEASURE	MONITORING RESPONSIBILITY	TIMING	VERIFICATION (DATE/INITIALS)
	<i>measures included as conditions of the permit shall be followed.</i>			
<p>Impact 3.4-10: Project implementation may result in conflicts with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance</p>	<p>Mitigation Measure 3.4-11: <i>The project proponent shall implement the following measure to avoid or minimize impacts on trees protected by the City of Davis:</i></p> <ul style="list-style-type: none"> • <i>Before the commencement of construction, the project proponent shall retain a qualified arborist to perform a survey of all trees within the footprint of the proposed off-site detention basin (located north of Sutter Hospital, and east of the City water tank). The tree survey and arborist report shall detail the number, species, size, and relative health and structure of all trees in the aforementioned area. The report will also describe which trees on-site are subject to regulation under the City of Davis Tree Ordinance.</i> • <i>A tree protection plan shall be prepared that includes measures to avoid or minimize impacts on trees that are to be preserved on-site and well as proposed mitigation for regulated trees subject to impact or removal. Compliance with the tree protection plan shall be required before and during any site disturbance and construction activity and before issuance of building permits. A tree modification permit shall be submitted to the City for any proposed removal of a tree. Fees shall be assessed by the City, and paid by the project proponent, in accordance with Davis Municipal Code Chapter 37, "Tree Planting, Preservation, and Protection."</i> 	<p>City of Davis Department of Community Development and Sustainability</p>	<p>Before start of construction activities</p>	
<p>Impact 3.4-11: Project implementation may result in conflicts with an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan</p>	<p>Mitigation Measure 3.4-12: <i>If the Yolo HCP/NCCP is adopted prior to initiation of any ground disturbing activities for any phase of development associated with the project, the project applicant shall comply with the requirements of the Yolo HCP/NCCP as applicable, which would likely replace other project mitigation measures for species covered in the Yolo HCP/NCCP. This would likely include the payment of fees, and the integration of applicable avoidance and mitigation measures for covered species. For species not covered by the Yolo HCP/NCCP, applicable mitigation measures in this EIR will continue to apply after adoption of the Yolo HCP/NCCP and must be satisfied by the project applicant. The project applicant, the City of Davis Department of Community Development and Sustainability, and a</i></p>	<p>City of Davis Department of Community Development and Sustainability, and a representative from the Yolo Habitat Conservancy</p>	<p>If the Yolo HCP/NCCP is adopted prior to initiation of any ground disturbing activities for any phase of development associated with the project</p>	

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FINAL MITIGATION MONITORING AND REPORTING PROGRAM

ENVIRONMENTAL IMPACT	MITIGATION MEASURE	MONITORING RESPONSIBILITY	TIMING	VERIFICATION (DATE/INITIALS)
	<p><i>representative of the Yolo Habitat Conservancy shall coordinate to ensure compliance with the Yolo HCP/NCCP for covered species and satisfaction of applicable EIR mitigation measures for non-covered species. To the extent there is duplication in mitigation for a given species, the requirements of the Yolo HCP/NCCP shall supersede.</i></p>			
CULTURAL AND TRIBAL RESOURCES				
<p>Impact 3.5-1: Project implementation has the potential to cause a substantial adverse change to a significant historical resource, as defined in CEQA Guidelines §15064.5, or a significant tribal cultural resource, as defined in Public Resources Code §21074</p>	<p>Mitigation Measure 3.5-1: All construction workers shall receive a sensitivity training session before they begin site work. The sensitivity training shall inform the workers of their responsibility to identify and protect any cultural resources, including prehistoric or historic artifacts, or other indications of archaeological resources, within the project site. The sensitivity training shall cover laws pertaining to cultural resources, examples of cultural resources that may be discovered in the project site, and what to do if a cultural resource, or anything that may be a cultural resource, is discovered.</p> <p><i>If any subsurface historic remains, prehistoric or historic artifacts, paleontological resources, other indications of archaeological resources, or cultural and/or tribal resources are found during grading and construction activities, all work within 100 feet of the find shall cease, the City of Davis Department of Community Development and Sustainability shall be notified, and the applicant shall retain an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards in prehistoric or historical archaeology, as appropriate, to evaluate the find(s). If tribal resources are found during grading and construction activities, the applicant shall notify the Yocha Dehe Wintun Nation. If paleontological resources are found during grading and construction activities, a qualified paleontologist shall be retained to determine the significance of the discovery.</i></p> <p><i>The archaeologist and/or paleontologist shall define the physical extent and the nature of any built features or artifact-bearing deposits. The investigation shall proceed immediately into a formal evaluation to determine the eligibility of the feature(s) for inclusion in the California Register of Historical Resources. The formal evaluation shall include, at a minimum, additional exposure of the feature(s), photo-documentation and</i></p>	<p>City of Davis Department of Community Development and Sustainability</p>	<p>Throughout all ground disturbing activities</p>	

ENVIRONMENTAL IMPACT	MITIGATION MEASURE	MONITORING RESPONSIBILITY	TIMING	VERIFICATION (DATE/INITIALS)
	<p><i>recording, and analysis of the artifact assemblage(s). If the evaluation determines that the feature(s) and artifact(s) do not have sufficient data potential to be eligible for the California Register, additional work shall not be required. However, if data potential exists (e.g., an intact feature is identified with a large and varied artifact assemblage), further mitigation would be necessary, which might include avoidance of further disturbance to the resource(s) through project redesign. If avoidance is determined to be infeasible, additional data recovery excavations shall be conducted for the resource(s), to collect enough information to exhaust the data potential of those resources.</i></p> <p><i>Pursuant to CEQA Guidelines Section 15126.4(b)(3)(C), a data recovery plan, which makes provisions for adequately recovering the scientifically consequential information from and about the resource, shall be prepared and adopted prior to any excavation being undertaken. Such studies shall be deposited with the California Historical Resources Regional Information Center. Data recovery efforts can range from rapid photographic documentation to extensive excavation depending upon the physical nature of the resource. The degree of effort shall be determined at the discretion of a qualified archaeologist and should be sufficient to recover data considered important to the area's history and/or prehistory. Significance determinations for tribal cultural resources shall be measured in terms of criteria for inclusion on the California Register of Historical Resources (Title 14 CCR, §4852[a]), and the definition of tribal cultural resources set forth in Public Resources Code Section 21074 and 5020.1 (k). The evaluation of the tribal cultural resource(s) shall include culturally appropriate temporary and permanent treatment, which may include avoidance of tribal cultural resources, in-place preservation, and/or re-burial on project property so the resource(s) are not subject to further disturbance in perpetuity. Any re-burial shall occur at a location predetermined between the landowner and the Yocha Dehe Wintun Nation. The landowner shall relinquish ownership of all sacred items, burial goods, and all archaeological artifacts that are found on the project area to the Yocha Dehe Wintun Nation for proper treatment and disposition. If an artifact must be removed during project excavation or testing, curation may be an appropriate mitigation.</i></p> <p><i>The language of this mitigation measure shall be included on any future grading plans, utility plans, and subdivision improvement drawings approved</i></p>			

ENVIRONMENTAL IMPACT	MITIGATION MEASURE	MONITORING RESPONSIBILITY	TIMING	VERIFICATION (DATE/INITIALS)
	<i>by the City for the development of the project.</i>			
Impact 3.5-2: Project implementation has the potential to cause a substantial adverse change to a significant archaeological resource, as defined in CEQA Guidelines §15064.5	Implement Mitigation Measure 3.5-1.	See Mitigation Measure 3.5-1	See Mitigation Measure 3.5-1	
Impact 3.5-3: Project implementation has the potential to directly or indirectly destroy a unique paleontological resource	Implement Mitigation Measure 3.5-1.	See Mitigation Measure 3.5-1	See Mitigation Measure 3.5-1	
Impact 3.5-4: Project implementation has the potential to disturb human remains, including those interred outside of formal cemeteries	<p>Mitigation Measure 3.5-2: <i>If human remains are discovered during the course of construction during any phase of the project, work shall be halted at the site and at any nearby area reasonably suspected to overlie adjacent human remains until the Yolo County Coroner has been informed and has determined that no investigation of the cause of death is required. If the remains are of Native American origin, either of the following steps will be taken:</i></p> <ul style="list-style-type: none"> • <i>The coroner shall contact the Native American Heritage Commission in order to ascertain the proper descendants from the deceased individual. The coroner shall make a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods, which may include obtaining a qualified archaeologist or team of archaeologists to properly excavate the human remains.</i> • <i>The landowner shall retain a Native American monitor, and an archaeologist, if recommended by the Native American monitor, and reburial the Native American human remains and any associated grave goods, with appropriate dignity, on the property and in a location that is not subject to further subsurface disturbance when any of the following conditions occurs:</i> <ul style="list-style-type: none"> ○ <i>The Native American Heritage Commission is unable to</i> 	City of Davis Department of Community Development and Sustainability	If human remains are discovered during the course of construction activity during any phase of the project	

ENVIRONMENTAL IMPACT	MITIGATION MEASURE	MONITORING RESPONSIBILITY	TIMING	VERIFICATION (DATE/INITIALS)
	<p><i>identify a descendant.</i></p> <ul style="list-style-type: none"> ○ <i>The descendant identified fails to make a recommendation.</i> ○ <i>The City of Davis or its authorized representative rejects the recommendation of the descendant, and the mediation by the Native American Heritage Commission fails to provide measures acceptable to the landowner.</i> 			
GEOLOGY AND SOILS				
<p>Impact 3.6-2: Implementation and construction of the proposed project may result in substantial soil erosion or the loss of topsoil</p>	<p>Mitigation Measure 3.6-1: <i>Prior to any site disturbance, the project proponent shall submit a Notice of Intent (NOI) and Storm Water Pollution Prevention Plan (SWPPP) to the RWQCB in accordance with the NPDES General Construction Permit requirements. The SWPPP shall be designed to control pollutant discharges utilizing Best Management Practices (BMPs) and technology to reduce erosion and sediments. BMPs may consist of a wide variety of measures taken to reduce pollutants in stormwater runoff from the project site. Measures shall include temporary erosion control measures (such as silt fences, staked straw bales/wattles, silt/sediment basins and traps, check dams, geofabric, sandbag dikes, and temporary revegetation or other ground cover) that will be employed to control erosion from disturbed areas. Final selection of BMPs will be subject to approval by the City of Davis and the RWQCB. The SWPPP will be kept on site during construction activity and will be made available upon request to representatives of the RWQCB.</i></p> <p>Mitigation Measure 3.6-2: <i>Prior to any site disturbance, the project proponent shall document to the satisfaction of the City of Davis that stormwater runoff from the project site is treated per the standards in the California Stormwater Best Management Practice New Development and Redevelopment Handbook and Section E.12 of the Phase II Small MS4 General Permit. Drainage from all paved surfaces, including streets, parking lots, driveways, and roofs shall be routed either through swales, buffer strips, or sand filters or treated with a filtering system prior to discharge to the storm drain system. Landscaping shall be designed to provide water quality treatment, along with the use of a Stormwater Management filter to permanently sequester hydrocarbons, if necessary. Roofs shall be designed with down spouting into landscaped areas, bubbleups, or trenches. Driveways</i></p>	<p>City of Davis Department of Community Development and Sustainability, City of Davis Department of Public Works, and the Regional Water Quality Control Board</p> <p>City of Davis Department of Community Development and Sustainability and Public Works Department</p>	<p>Prior to any site disturbance</p> <p>Prior to any site disturbance</p>	

ENVIRONMENTAL IMPACT	MITIGATION MEASURE	MONITORING RESPONSIBILITY	TIMING	VERIFICATION (DATE/INITIALS)
	<p><i>should be curbed into landscaping so runoff drains first into the landscaping. The aforementioned requirements shall be noted on the Preliminary and Final Planned Developments for the project.</i></p>			
<p>Impact 3.6-3: The proposed project would be located on a geologic unit or soil that is unstable, or that would become unstable as a result of project implementation, and potentially result in landslide, lateral spreading, subsidence, liquefaction or collapse</p>	<p>Mitigation Measure 3.6-3: <i>Prior to final design approval and issuance of building permits for each phase of the project, the project applicant shall submit to the City of Davis Building Inspection Division, for review and approval, a design-level geotechnical engineering report produced by a California Registered Civil Engineer or Geotechnical Engineer. The report shall include the recommendations in the report entitled Preliminary Geotechnical Assessment, Davis Innovation Center, dated October 20, 2014 unless it is determined in the design-level report that one or more recommendations need to be revised. The design-level report shall address, at a minimum, the following:</i></p> <ul style="list-style-type: none"> • <i>Compaction specifications and subgrade preparation for onsite soils;</i> • <i>Structural foundations;</i> • <i>Grading practices; and</i> • <i>Expansive/unstable soils, including fill.</i> <p><i>The design-level geotechnical engineering report shall include a summary of the site, soil, and groundwater conditions, seismicity, laboratory test data, exploration data and a site plan showing exploratory locations and improvement limits. The report shall be signed by a licensed California Geotechnical Engineer. Design-level recommendations shall be included in the foundation and improvement plans and approved by the Davis Public Works Department prior to issuance of any building permits.</i></p>	<p>City of Davis Building Inspection Division</p>	<p>Prior to final design approval and issuance of building permits for each phase of the project</p>	

ENVIRONMENTAL IMPACT	MITIGATION MEASURE	MONITORING RESPONSIBILITY	TIMING	VERIFICATION (DATE/INITIALS)
GREENHOUSE GASES AND CLIMATE CHANGE				
Impact 3.7-2: The proposed project may generate operation-related GHGs, either directly or indirectly, that may have a significant effect on the environment	Mitigation Measure 3.7-1: Prior to issuance of building permits, the applicant shall ensure that all residential units are designed such that they to achieve a minimum of 15% greater energy efficiency than the baseline 2016 Title-24 Energy Efficiency requirements (compliant with Tier 1 of the 2016 CalGreen Code).	City of Davis Director of Community Development and Sustainability	Prior to the issuance of building permits	
HAZARDS AND HAZARDOUS MATERIALS				
Impact 3.8-1: The project may have the potential to create a significant hazard through the routine transport, use, or disposal of hazardous materials or through the reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment	<p>Mitigation Measure 3.8-1: A soil sampling program shall be implemented to assess potential agrichemical (including pesticides, herbicides, diesel, petrochemicals, etc.) impacts to surface soil within the project site, as follows:</p> <p><i>The sampling and analysis plan shall meet the requirements of the Department of Toxic Substances Control Interim Guidance for Sampling Agricultural Properties (2008). If the sampling results indicate the presence of agrichemicals that exceed screening levels, a removal action workplan shall be prepared in coordination with Yolo County Environmental Health Division. The removal action workplan shall include a detailed engineering plan for conducting the removal action, a description of the onsite contamination, the goals to be achieved by the removal action, and any alternative removal options that were considered and rejected and the basis for that rejection. The removal action shall be deemed complete when the confirmation samples exhibit concentrations below the commercial screening levels, which will be established by the agencies.</i></p> <p>Mitigation Measure 3.8-2: Prior to commencement of grading, the applicant shall submit a Soil Management Plan (SMP) for review and approval by the City. The SMP shall establish management practices for handling hazardous materials, including fuels, paints, cleaners, solvents, etc., during construction to reduce the potential for spills and to direct the safe</p>	<p>City of Davis Director of Community Development and Sustainability (for review of program), and Yolo County Environmental Health Division (if the sampling results indicate the presence of agrichemicals that exceed screening levels)</p> <p>City of Davis Director of Community Development</p>	<p>Prior to the issuance of grading permits</p> <p>Prior to start of grading</p>	

ENVIRONMENTAL IMPACT	MITIGATION MEASURE	MONITORING RESPONSIBILITY	TIMING	VERIFICATION (DATE/INITIALS)
	<p><i>handling of these materials if encountered. The city will approve the SMP prior to any earth moving.</i></p> <p>Mitigation Measure 3.8-3: <i>Prior to bringing hazardous materials (including 55 or more gallons for liquids, 500 or more pounds for solids, and/or 200 or more cubic feet for compressed gases) onsite, the applicant shall submit a Hazardous Materials Business Plan (HMBP) to Yolo County Environmental Health Division (CUPA) for review and approval. If during the construction process the applicant or his subcontractors generates hazardous waste, the applicant must register with the CUPA as a generator of hazardous waste, obtain an EPA ID# and accumulate, ship and dispose of the hazardous waste per Health and Safety Code Ch. 6.5. (California Hazardous Waste Control Law).</i></p> <p>Mitigation Measure 3.8-4: <i>If any underground septic tanks, or fuel tanks are uncovered from past site uses during construction, the project proponent shall retain an environmental professional to assist with the removal consistent with the Yolo County Environmental Health Department's Underground Storage Tank Program, and Septic Abandonment Permit requirements.</i></p> <p>Mitigation Measure 3.8-5: <i>Project site wells that are no longer operated shall be properly abandoned through permit by the Yolo County Environmental Health Division (YCEH) permit program. The well abandonment work shall be completed by a C-57 State licensed well contractor.</i></p> <p>Mitigation Measure 3.8-6: <i>If the source of soil onsite soil stockpiles is</i></p>	<p>and Sustainability</p> <p>Yolo County Environmental Health Division</p> <p>Yolo County Environmental Health Division</p> <p>Yolo County Environmental Health Division</p>	<p>Prior to bringing hazardous materials (including 55 or more gallons for liquids, 500 or more pounds for solids, and/or 200 or more cubic feet for compressed gases) onsite</p> <p>If any underground septic tanks, or fuel tanks are uncovered from past site uses during construction</p> <p>If any site wells will no longer be operated</p>	

ENVIRONMENTAL IMPACT	MITIGATION MEASURE	MONITORING RESPONSIBILITY	TIMING	VERIFICATION (DATE/INITIALS)
	<p><i>undocumented, the applicant shall confirm to the City of Davis that soil sampling of the stockpiles was performed to identify potential soil contaminants associated with onsite soil stockpiles. The samples shall be submitted for laboratory analysis of total petroleum hydrocarbons (TPH) (gas, diesel and motor oil) by EPA Method 8015M and volatile organic compounds (VOCs) by EPA Method 8260. The results of the soil sampling shall be provided to the City of Davis. If elevated levels of TPH or VOCs are detected during the laboratory analysis of the soils, a soil cleanup and remediation plan shall be prepared and implemented prior to the commencement of grading activities.</i></p>	<p>City of Davis Department of Community Development and Sustainability</p>	<p>If the source of soil onsite soil stockpiles is undocumented</p>	
HYDROLOGY AND WATER QUALITY				
<p>Impact 3.9-1: The project may violate water quality standards or waste discharge requirements during construction</p>	<p>Implement <i>Mitigation Measure 3.6-1.</i></p> <p><i>Mitigation Measure 3.9-1:</i> <i>Prior to the commencement of construction activities, the project proponent shall submit, and obtain approval of, a Spill Prevention Countermeasure and Control Plan (SPCC) to the Yolo County Health Department. The SPCC shall specify measures and procedures to minimize the potential for, and effects from, spills of hazardous, toxic, or petroleum substances during all construction activities, and shall meet the requirements specified in the Code of Federal Regulations, title 40, part 112.</i></p>	<p>See Mitigation Measure 3.6-1</p> <p>Yolo County Health Department</p>	<p>See Mitigation Measure 3.6-1</p> <p>Prior to the commencement of construction activities</p>	
<p>Impact 3.9-2: The project may violate water quality standards or waste discharge requirements post-construction</p>	<p><i>Mitigation Measure 3.9-2:</i> <i>Prior to issuance of building or grading permits, the applicant shall submit a final stormwater and drainage plan identifying permanent stormwater control measures to be implemented by the project to the City. The plan shall include measures consistent with the adopted guidelines and requirements set forth in the "Phase II Small MS4 General Permit, 2013-0001-DWQ," dated February 5, 2013 and shall be subject to review and approval by the Public Works Department.</i></p>	<p>City of Davis Department of Public Works</p>	<p>Prior to issuance of building or grading permits</p>	
<p>Impact 3.9-6: The project may place housing or structures that would impede/redirect flows within a 100-year flood hazard</p>	<p><i>Mitigation Measure 3.9-3:</i> <i>Prior to the issuance of grading permits and subsequently prior to the issuance of building permits, the project applicant shall either demonstrate that the developed portions of the project site are outside of the anticipated 100-year flood hazard area, or incorporate</i></p>	<p>City of Davis Department of Public Works</p>	<p>Prior to issuance of grading permits and</p>	

ENVIRONMENTAL IMPACT	MITIGATION MEASURE	MONITORING RESPONSIBILITY	TIMING	VERIFICATION (DATE/INITIALS)
<p>area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map</p>	<p><i>measures into the proposed project to achieve a 100-year level of flood protection for any site installations. This may include elevating the proposed building pads above the base flood elevation, installing adequate storm water retention areas, or other measures commonly accepted by the City of Davis.</i></p> <p>Mitigation Measure 3.9-4: <i>Prior to commencement of grading operations, the project proponent shall prepare and submit an application for Conditional Letter of Map Revision (CLOMR) to FEMA for approval. The CLOMR shall include revised local base flood elevations based on current modeling of the project site. No building permit shall be issued in the area impacted by the CLOMR until a CLOMR has been approved by FEMA.</i></p> <p>Mitigation Measure 3.9-5: <i>The building pads for all onsite structures shall be set a minimum of 1.0 foot above the maximum 100-year water surface elevations on the project site, as shown on the Conditional Letter of Map Revision (CLOMR) approved by FEMA. No building permit shall be issued until a CLOMR has been approved by FEMA, and it has been demonstrated that no building pads would be placed below 1.0 feet above the calculated local base flood elevations.</i></p>	<p>Federal Emergency Management Agency</p> <p>Federal Emergency Management Agency</p>	<p>subsequently prior to the issuance of building permits</p> <p>Prior to commencement of grading operations</p> <p>Prior to issuance of building permits</p>	
TRANSPORTATION AND CIRCULATION				
<p>Impact 3.14-5: Under cumulative plus project conditions, project</p>	<p>Mitigation Measure 3.14-1: <i>No later than recordation of the final map creating the 200th market-priced lot, the project applicant(s) shall contribute fair share funding to cover their proportionate cost of the following intersection improvements:</i></p> <ul style="list-style-type: none"> a) <i>West Covell Boulevard/SR 113 NB Ramps – widen northbound off-ramp to consist of three lanes (i.e., one left, one shared left/through/right, and one right-turn lane) approaching West Covell Boulevard. The fair share funding shall be submitted to Caltrans.</i> b) <i>West Covell Boulevard/Sycamore Lane – lengthen eastbound left-turn lane from 150 to 275 feet. The fair share funding shall be submitted to the City of Davis.</i> 	<p>City of Davis Department of Public Works</p>	<p>No later than recordation of the final map creating the 200th market-priced lot</p>	

ENVIRONMENTAL IMPACT	MITIGATION MEASURE	MONITORING RESPONSIBILITY	TIMING	VERIFICATION (DATE/INITIALS)
Impact 3.14-6: Under cumulative plus project conditions, project implementation would cause significant impacts at study freeway facilities	<i>Implement Mitigation Measure 3.14-1(a): Pay fair share to widen northbound SR 113 off-ramp at West Covell Boulevard to consist of three lanes approaching West Covell Boulevard.</i>	City of Davis Department of Public Works	No later than recordation of the final map creating the 200 th market-priced lot	
Impact 3.14-9: The proposed site plan would not provide adequate emergency vehicle access	Mitigation Measure 3.14-2: <i>By the time the final map is submitted, the final map shall indicate that the project shall dedicate an emergency vehicle access easement from the project site to John Jones Road. Best efforts shall be made by the project applicant to work with Sutter Davis Hospital to obtain the easement.</i>	City of Davis Department of Public Works	By the time the final map is submitted	
Impact 3.14-10: The proposed site plan would not provide adequate project access	Mitigation Measure 3.14-3: <i>No later than recordation of the final map creating the 200th market-priced lot, the project applicant(s) shall contribute fair share funding to cover their proportionate cost of the following intersection improvements:</i> <ul style="list-style-type: none"> <i>a) West Covell Boulevard/Risling Court/Shasta Drive – lengthen the southbound right-turn lane from 85 to 200 feet. The fair share funding shall be submitted to the City of Davis.</i> <i>b) West Covell Boulevard/Risling Court/Shasta Drive – lengthen the eastbound left-turn lane from 175 to 250 feet. The fair share funding shall be submitted to the City of Davis.</i> 	City of Davis Department of Public Works	No later than recordation of the final map creating the 200 th market-priced lot	

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Appendix A

Fehr & Peers Memorandum



MEMORANDUM

Date: March 22, 2018
To: Ben Ritchie, De Novo Planning Group
From: John Gard, Fehr & Peers
Subject: West Davis Active Adult Community EIR – Evaluation of Proposed Right-Turn Lane Modifications at West Covell Boulevard/Risling Court/Shasta Drive Intersection

RS17-3524

This memorandum presents a focused analysis of traffic operations at the West Covell Boulevard/Risling Court/Shasta Drive intersection.

BACKGROUND

The Draft EIR assumed that the westbound and northbound right-turns at this intersection would continue to have channelized 'free-flow right-turn lanes. Both corners currently include triangular raised medians with flared approach lanes. The northbound right-turn movement has a full-width acceleration lane departing the intersection, while the westbound right-turn movement has a minimal acceleration area. These designs allow motorists to perform these right-turn movements at a relatively high rate of speed, though they must yield to through traffic when present.

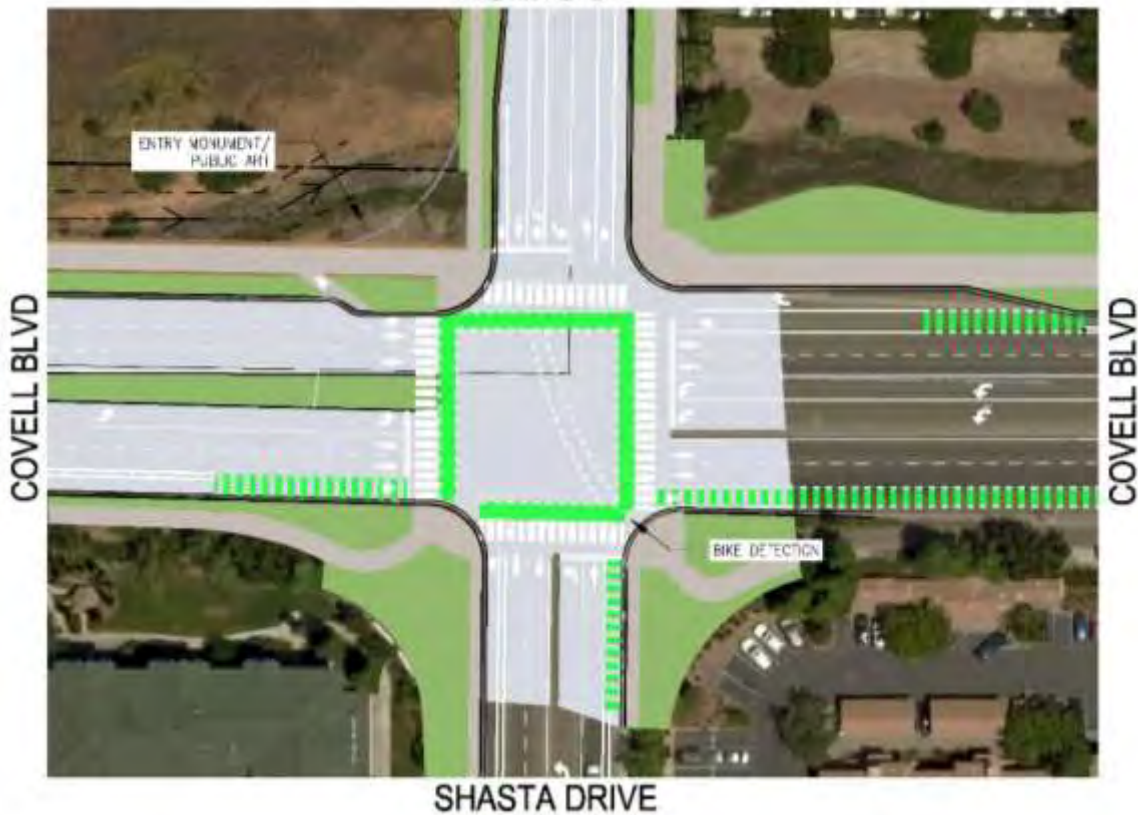
PROPOSED GEOMETRIC CHANGES

We were requested to analyze changes in traffic operations under various scenarios assuming the following changes at the intersection (see Figure 1):

- Remove triangular raised median and convert westbound right-turn lane to a signal-controlled movement with a 150-foot turn pocket.
- Remove triangular raised median and restripe northbound through lane to be a shared through/right lane.



Figure 1: Modified Intersection
RISLING CT



OPERATIONS ANALYSIS RESULTS

We analyzed the operations associated with this modified intersection under Existing Plus Project, Cumulative Plus Project, and Cumulative Plus Project (Mitigated) conditions using the same micro-simulation modeling analysis employed in the DEIR. The LOS results are shown in Tables 1 through 3. Delays would increase slightly, though operations would remain at an acceptable LOS C or better under all scenarios. Additionally, no adjacent intersections would experience degraded operations.

Therefore, the proposed geometric modifications would not cause any new significant intersection LOS impacts.



Table 1: Peak Hour Intersection Level of Service – Existing Plus Project Conditions

Intersection	Control	Level of Service (LOS)			
		Channelized Northbound and Westbound Right-Turns		Signal-Controlled Northbound and Westbound Right-Turns	
		AM Peak Hour	PM Peak Hour	AM Peak Hour	PM Peak Hour
Covell Blvd/Risling Ct/Shasta Dr	Signal	C	B	C	C

Notes: City of Davis LOS standard is "E".
 Source: Fehr & Peers.

Table 2: Peak Hour Intersection Level of Service – Cumulative Plus Project Conditions

Intersection	Control	Level of Service (LOS)			
		Channelized Northbound and Westbound Right-Turns		Signal-Controlled Northbound and Westbound Right-Turns	
		AM Peak Hour	PM Peak Hour	AM Peak Hour	PM Peak Hour
Covell Blvd/Risling Ct/Shasta Dr	Signal	C	C	C	C

Notes: City of Davis LOS standard is "E".
 Source: Fehr & Peers.

Table 3: Peak Hour Intersection Level of Service – Cumulative Plus Project Conditions with Mitigation

Intersection	Control	Level of Service (LOS)			
		Channelized Northbound and Westbound Right-Turns		Signal-Controlled Northbound and Westbound Right-Turns	
		AM Peak Hour	PM Peak Hour	AM Peak Hour	PM Peak Hour
Covell Blvd/Risling Ct/Shasta Dr	Signal	C	C	C	C

Notes: City of Davis LOS standard is "E".
 Source: Fehr & Peers.



VEHICULAR QUEUING

Results from the micro-simulation modeling revealed the following conclusions regarding turn pocket storage adequacy at the West Covell Boulevard/Risling Court/Shasta Drive intersection:

- Westbound Right-Turn: Under Cumulative Plus Project conditions, the westbound right-turn lane is projected to have a maximum queue of 200 feet (i.e. eight vehicles) during both the AM and PM peak hours. However, this is caused by queued vehicles in the westbound through lane blocking access to the right-turn pocket (see SimTraffic screenshot in Figure 2 below). This occurs infrequently, and therefore does not warrant further lengthening of the right-turn lane. Queued vehicles would not occupy the entirety of the right-turn lane and spill out of it.
- Northbound Right-Turn: Under Cumulative Plus Project conditions, the shared northbound through/right-turn lane would have a maximum queue of 325 feet (i.e. 13 vehicles) during both the AM and PM peak hours. This queue would nearly spill back into the upstream University Retirement Community/Adobe Apartments driveway.

Figure 2: Queuing on Westbound Approach of Covell Boulevard/Risling Court/Shasta Drive Under Cumulative Plus Project Conditions with Modified Configuration





REVISED CONFIGURATION

Figure 3 shows the most recent modification to the intersection design. This configuration maintains the same westbound right-turn lane configurations, but incorporates an exclusive northbound right-turn lane that would separate the through and right-turn demands.

Figure 3: Revised Intersection



The configuration shown in Figure 3 would accomplish the following objectives:

- It would not worsen operations at a study intersection to an unacceptable level.
- Relative to the configuration in Figure 1, it would reduce queuing on the northbound approach by providing a dedicated right-turn lane.

With respect to bicyclists, the configuration in Figure 3 offers several benefits over the configuration contemplated in the Draft EIR including;

1. Eastbound bicyclists on West Covell Boulevard would no longer have to merge with high-speed, free-flowing northbound right-turns. Instead, a continuous Class II bike lane (with skip striping in conflict areas) would be provided.
2. The removal of the triangular raised median in the westbound right-turn lane would slow right-turning vehicles and improve the bicycling environment on Risling Court.