EXHIBIT B
TO RESOLUTION CERTIFYING THE FINAL ENVIRONMENTAL IMPACT REPORT, ADOPTING ENVIRONMENTAL FINDINGS, STATEMENT OF OVERRIDING CONSIDERATIONS, AND ERRATA FOR THE CITY OF WOODLAND 2035 GENERAL PLAN AND 2035 CLIMATE ACTION PLAN

CEQA FINDINGS OF FACT AND STATEMENT OF OVERRIDING CONSIDERATIONS FOR THE CITY OF WOODLAND FINAL 2035 GENERAL PLAN AND 2035 CLIMATE ACTION PLAN

I. INTRODUCTION

The California Environmental Quality Act ("CEQA") (Public Resources Code §§ 21000 *et seq*.) requires the City of Woodland, as the lead agency, to make certain written findings and to identify overriding considerations for significant and unavoidable impacts identified in the Environmental Impact Report ("EIR") for the City of Woodland 2035 General Plan and the 2035 Climate Action Plan ("CAP"), together referred to as the "Proposed Project." CEQA Guidelines (Title 14 of the California Code of Regulations) sections 15091, 15092, and 15093 set forth the specific requirements for these findings.

CEQA requires an EIR to be prepared when the lead agency has determined that a project may or will have significant impacts on the environment. Prior to project approval, the EIR must be certified pursuant to Section 15090 of the CEQA Guidelines. When an EIR has been certified that identifies one or more significant environmental impacts, the approving agency must make one or more of the following findings, accompanied by a brief explanation of the rationale, pursuant to Section 15091 of the CEQA Guidelines, for each identified significant impact:

a) Changes or alterations have been required in, or incorporated into, such project which avoid or substantially lessen the significant environmental effect as identified in the final environmental impact report.

b) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency, or can and should be adopted by such other agency.

c) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the environmental impact report.

CEQA Guidelines Section 15092 states that after consideration of an EIR, and in conjunction with making the Section 15091 findings identified above, the lead agency may decide whether or how to approve or carry out the project. A project that would result in a significant environmental impact cannot be approved if feasible mitigation measures or feasible alternatives can avoid or substantially lessen the impact.

However, in the absence of feasible mitigation, an agency may approve a project with significant and unavoidable impacts if there are specific economic, legal, social, technological, or other considerations that outweigh the unavoidable adverse environmental effects. Section 15093 requires the lead agency to

document and substantiate any such determination in "statements of overriding considerations" as a part of the record.

The requirements of Guidelines Sections 15091, 15092, and 15093 as summarized above are all addressed herein. This document is intended to serve as the findings of fact and statement of overriding considerations authorized by those provisions of the CEQA Guidelines. The findings provide the written analysis and conclusions of the City Council regarding the Proposed Project's environmental impacts, mitigation measures, alternatives to the Proposed Project, and the overriding considerations that justify approval of the Proposed Project despite its environmental effects.

II. GENERAL FINDINGS AND OVERVIEW: PROJECT DESCRIPTION

A. Proposed Project

The Proposed Project is adoption of the Final 2035 General Plan and 2035 CAP. The 2035 General Plan and 2035 CAP apply to all land within the City's Planning Area, which consists of all territory within the City limits, as well as land outside the City's boundaries that, in the City's judgment, bears relation to its planning. The City's Planning Area is defined by the Urban Limit Line ("ULL"). The Planning Area encompasses 12,781 acres, or approximately 20 square miles. It is bounded roughly by Churchill Downs Avenue to the north, County Road 98 to the west, and County Road 25A to the south. The Planning Area includes 9,619 acres within existing City limits and 3,162 acres in unincorporated Yolo County.

1. 2035 General Plan Summary

The 2035 General Plan is the City's "constitution" for the future physical development of the City. It sets forth the City's long-range objectives for physical development and conservation. The General Plan is a 20-year planning document with a planning horizon of 2035. The 2035 General Plan plans for the addition of up to 19,300 new residents, 18,200 to 19,300 new jobs, 16.7 million to 17.4 million square feet of new non-residential land uses, and 7,000 new homes in Woodland by 2035.

The 2035 General Plan is required to address seven mandatory elements: land use, circulation (including public utilities and facilities), housing, conservation, open space, noise, and safety. The 2035 General Plan addresses these seven elements as well as includes healthy community and economic development elements. The 2035 General Plan is organized into nine chapters as follows: Introduction and Administration; Land Use, Community Design, and Historic Preservation Element; Transportation and Circulation Element, Public Facilities and Services Element; Healthy Lifestyles Element; Sustainability, Conservation, and Open Space Element; Safety Element; Economic Development Element; and Housing Element. Within each chapter the following information is generally provided: introduction and purpose, background information, and goals and policies.

2. 2035 CAP Summary

The 2035 CAP identifies measures that implement the 2035 General Plan, while also contributing on a fair-share basis to the State's climate protection efforts. The 2035 CAP comprehensively describes the strategy to reduce greenhouse gas (GHG) emissions. It identifies specific reduction strategies the City will undertake and quantifies their benefits, in order to be consistent with State directives for reducing GHGs, including CEQA Guidelines Section 15183.5. The strategies are aimed at reducing community-wide GHG emissions to a level 15 percent below Woodland's 2005 GHG levels by 2020 and a maximum of 2.25 metric tons of equivalent carbon dioxide per service population per year by 2035. These targets were

selected to establish local emissions reductions on a long-term trajectory consistent with the State's GHG emissions reduction goal for 2050 (80 percent below 1990 levels).

In addition, the 2035 CAP measures increase community resilience and efficiency of human/economic activities that consume resources which, in turn, lead to GHG emissions (e.g., increasing local energy independence, reducing transportation-related emissions, improving building energy and water efficiency, and extending the life of area landfills).

The 2035 CAP is organized into six chapters, as follows:

1. Executive Summary
2. Introduction and Overview
3. Emissions Inventories and Targets
4. Greenhouse Gas Reduction Strategies
5. Implementation and Monitoring
6. Acknowledgements.

B. Consideration of the EIR

In adopting these Findings, the City Council finds that the Final EIR was presented to the City Council, the lead agency's decision-making body, and that the City Council reviewed and considered the information in the Final EIR prior to approving the Proposed Project. The City Council finds that the Final EIR reflects the independent judgment and analysis of the City.

The three discretionary actions to be taken by the City Council are: (1) certification of the Final EIR for the 2035 General Plan and 2035 CAP; (2) adoption of the 2035 General Plan; and (3) adoption of the 2035 CAP.

C. Proposed Project Objectives

This section sets forth the Proposed Project's objectives. The City Council determines that the Final 2035 General Plan and 2035 CAP best meet these objectives, as discussed further in Section VIII below.

1. 2035 General Plan Objectives

Pursuant to State law, the overarching objective of a general plan is to guide a jurisdiction's growth over a long-term planning horizon, in a manner consistent with the community's vision of its long-term physical form and development. The General Plan's Guiding Principles were developed to set a framework for the 2035 General Plan and highlight the most critical shared values that were used in developing the 2035 General Plan and 2035 CAP. Together with the 2035 General Plan Vision Statement, the Guiding Principles also serve as the Project Objectives for the EIR for the Proposed Project. They include the following:

2035 General Plan Vision Statement:

> In 2035, Woodland is a highly desirable community to live, learn, work and recreate. It has maintained a small-town feel while maturing into an attractive, vibrant, and sustainable city that celebrates its architectural heritage and cultural diversity. Woodland is a healthy community with livable neighborhoods, a thriving downtown, well maintained

infrastructure, excellent schools and recreational amenities connected by a seamless network of trails and paths.

The city is the region's center of agricultural technology and food production and is recognized globally as a leader in sustainable agriculture. The community is prosperous and fiscally sound, offering abundant employment opportunities to its diverse and creative workforce.

Woodland has become a destination for visitors seeking to experience its unique agricultural, historical, recreational, cultural and entertainment amenities.

2035 General Plan Guiding Principles:

- **Quality and Character:** Retain and enhance Woodland's quality of life, its distinctive identity and small-town characteristics.
- **Orderly Development:** Promote new growth while achieving an orderly pattern of community development, consistent with economic, social, fiscal and environmental needs.
- **Historic Downtown:** Strengthen the historic downtown district as the City's center of shopping, dining, entertainment and employment.
- **Economic Development:** Foster economic growth and diversification with a range of employment opportunities for all residents.
- **Mobility Options:** Coordinate land use and transportation planning to provide a range of attractive and viable transportation options, such as bicycle, pedestrian, and transit.
- **Housing Choice:** Provide a variety of housing types to meet the needs for all generations and income levels.
- **Agricultural Heritage:** Preserve and protect prime agricultural lands and their uses within and surrounding the community.
- **Safety:** Ensure that Woodland remains a safe place to live, protected from natural and manmade hazards.
- **Environmental Stewardship:** Foster a sustainable community for the next generation and protect and improve the quality of the natural environment.
- **Public Services:** Provide realistic, supportable and appropriate levels of public service that are sustainable and fiscally sound.
- **Health and Recreation:** Provide all residents with opportunities to live an active, healthy, and green lifestyle.
- **Quality Education:** Foster quality educational and enrichment opportunities.

2. 2035 CAP Objectives

The 2035 CAP is organized into six focus area, each of which includes overarching strategies to achieve each objective and implementation actions for each strategy. The 2035 CAP objectives are as follows:

- **Energy**:
  - Reduce Building Energy Use
  - Increase Renewable Energy Generation
- **Transportation and Land Use**:
  - Implement Land Use Policies to Support Reduced Motor Vehicle Use
  - Reduce Vehicle Trip Mileage and Equipment Idling Emissions
  - Replace Gas and Diesel Vehicles with Alternative-Fuel Vehicles

- **Urban Forest and Open Space**:
  - Increase Community Tree Canopy
  - Maintain and Enhance Open Space Environmental Values
- **Water and Solid Waste**:
  - Reduce Per Capita Water Demand
  - Achieve 75 percent Landfill Waste Diversion
  - Achieve 90 percent Landfill Methane Capture
- **Public Involvement**:
  - Build Community Engagement in CAP Implementation
  - Measure CAP Implementation Progress and Adjust Actions as Needed
- **Municipal Operations**:
  - Incorporate Sustainable Practices into All City Operations
  - Reduce Emissions from Municipal Electricity Use by 80 percent or More
  - Reduce Vehicle Fleet and Employee Commute Emissions

III. GENERAL FINDINGS: GENERAL CEQA CONSIDERATIONS

A. CEQA Process

The City released the Draft EIR on July 8, 2016 for a 45-day public review period that extended through September 13, 2016. Hearings on the Draft EIR were held before the Planning Commission and City Council on August 24, 2016; before the Planning Commission on September 1, 2016; and before the City Council on September 13, 2016 and September 20, 2016.

The Planning Commission held a duly noticed public hearing on March 16, 2017, and recommended by adoption of Resolution No. PC17-01 that the City Council certify the EIR. The City Council held duly noticed public hearings on April 4, April 18, and May 16, 2017 on the EIR and Proposed Project.

B. Intent to Rely on this EIR for Streamlining Purposes

The EIR describes the environmental consequences of implementation of the goals and policies of the 2035 General Plan, land use changes consistent with that planned under the 2035 General Plan, and implementation of the 2035 CAP. The EIR is designed to inform City of Woodland decision-makers, other responsible and trustee agencies, and the general public of the potential environmental consequences of approval and implementation of the Proposed Project. The EIR identifies goals, policies, and implementation programs that are integrated into the Proposed Project that would reduce or avoid potentially significant impacts.

The 2035 General Plan and 2035 CAP EIR is a program EIR, as described under CEQA and the CEQA Guidelines, specifically Guidelines Section 15168. A program EIR is one that may be prepared on a series of actions that can be characterized as one large project, and that are related: (1) geographically; (2) as logical parts in the chain of contemplated actions; (3) in connection with the issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program; or (4) as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar effects that can be mitigated in similar ways.

The EIR satisfies the criteria set forth above. The Proposed Project governs land use, development, and conservation within the entire Woodland Planning Area, thus resulting in a geographic relationship. It includes maps, goals, policies, and implementation programs that are logical parts of a chain of

contemplated actions governing future land use and allowed development. The policies and programs either directly establish, or will govern future plans that will establish, rules, regulations, plans, or other general criteria governing implementation of the Proposed Project. The Proposed Project will be carried out under the authority and approval of the City of Woodland, although responsible and trustee agencies will be involved in certain aspects of permitting. Many of the specific projects and actions carried out pursuant to the Proposed Project would have similar environmental impacts, which could be mitigated in similar ways.

The City intends to use the EIR to streamline future environmental review and approval of private and public projects, as well as implementation actions, such as updates to zoning that are consistent with the 2035 General Plan. The City will use existing streamlining provided by CEQA, and emerging streamlining techniques, as appropriate, in the implementation of the Proposed Project.

The EIR uses detailed, parcel-level land use programming for the basis of analysis, with a focus on vacant and underutilized properties that would be appropriate for development between the present and 2035. The EIR includes a comprehensive analysis of land use changes anticipated under the 2035 General Plan. The EIR includes quantified estimates in certain impact areas, such as transportation, air quality, GHG emissions, noise, and other topics, based on assumptions as to the amount, type, and character of land use changes under the 2035 General Plan. The policy development process was used to vet potential mitigation strategies, which are fully integrated into the Proposed Project. The 2035 General Plan Update process was used to investigate policies and programs that will serve as uniformly applied standards and limit the scope of analysis for projects consistent with the Proposed Project.

The City intends to streamline environmental review of future projects as much as possible under CEQA. CEQA Guidelines Section 15183 provides that additional environmental review is not required for projects that are consistent with the development density established by existing general plan policies for which an EIR has been certified except if necessary to study any significant environmental effects that are particular to the project or site. For this reason, the EIR includes references to 2035 General Plan and 2035 CAP policies, implementation programs, and reduction strategies, where appropriate, to address environmental impacts. Future CEQA documents will reference the policies, programs, and reduction strategies to demonstrate less-than-significant impacts and substantiate that later project-level issues are not "peculiar to the parcel" if they have been "substantially mitigated" by policies, programs, and reduction strategies (uniformly applied development policies) adopted as a part of the Final 2035 General Plan and 2035 CAP.

IV. GENERAL FINDINGS: GENERAL PROJECT BENEFITS

The City Council finds that the Proposed Project will result in the following general benefits (in no relative order – numbered for convenience only):

A. General Benefits

1. Satisfies the requirements of State law, has been reviewed and is responsive to the requirements of State agencies with legal authority, and has been comprehensively analyzed under CEQA and modified to include all identified mitigation measures.
2. Advocates responsible growth while seeking to conserve energy, water, and other resources; reduce greenhouse gas emissions; promote infill, compact, and net-zero energy development; and build community resiliency to the effects of climate change.

3. Provides for strategic growth and change that preserves and enhances existing neighborhoods; prioritizes new growth in infill areas through the revitalization of Downtown, key corridors, and employment centers; provides for orderly expansion to new growth areas; and maintains Woodland's unique agricultural and historical heritage.

4. Focuses on enhancing the quality of life for Woodland residents, workers, and visitors through improved connectivity, increased access to amenities, and greater housing and employment choices.

5. Maintains the voter-approved Urban Limit Line within which urban development will be contained.

6. Provides for urban development and expansion of associated services to accommodate projected population and employment growth.

7. Manages growth to ensure adequate infrastructure, public services, and amenities that the City can provide and maintain and that new growth will not detract from existing neighborhoods and commercial centers.

8. Promotes infill and adaptive reuse of underutilized and vacant buildings.

B. Quality of Life Benefits

1. The 2035 General Plan preserves Woodland's unique small town charm and quality of life by maintaining the city's distinct urban edge and surrounding agricultural open space, promoting the Downtown and historic resources, and developing a variety of recreational, community, and cultural facilities.

2. The General Plan recognizes Woodland's surrounding agriculture is an important part of the community's heritage, plays a major role in the city's economy, and endows Woodland with a unique sense of place.

3. Allows development that strengthens the physical form of the City, enhances livability, incorporates sustainable design practices, and continues to enhance Woodland's unique sense of place.

4. Promotes Downtown as the civic, cultural, and entertainment center of Woodland by promoting a broad mix of uses, including increased dining, retail, and entertainment destinations with an array of urban housing and professional office/technology companies.

5. Preserves, maintains, and celebrates sites and structures that serve as significant, visible reminders of the city's social, architectural and agricultural history through adherence to federal, State, and local programs and requirements.

6. Protects and maintains waterways, wildlife habitats, and other open space.

C. Land Use, Community Design, and Historic Preservation Benefits

1. The Land Use, Community Design, and Historic Preservation Element directs the location and form of future development, shaping where people will live, work, play, and shop in Woodland.

2. This Element presents the desirable pattern for the ultimate development of the city for the General Plan horizon (year 2035) and seeks to ensure that land use planning reflects the community's evolution and changing demographics, while promoting sustainability.

3. Promotes the development of complete neighborhoods with a physical layout and land use mix that: puts residents in close proximity to services and amenities; promotes walking, biking, and transit use; fosters community pride; enhances neighborhood identity; ensures public safety; and meets the needs of all ages and abilities (Policy 2.A.5 of the Land Use, Community Design, and Historic Preservation Element).

4. Encourages infill development, adaptive reuse, and the restoration of historic buildings in existing urbanized areas to enhance community character, promote pedestrian- and bicycle-friendly neighborhoods, increase housing diversity, ensure integrity of historic districts, optimize City investment in infrastructure, support increased transit use, and enhance economic vitality (Policy 2.A.6 of the Land Use, Community Design, and Historic Preservation Element).

5. Promotes compact development patterns and mixing of land uses to conserve land resources, reduce vehicle trips, improve air quality, and facilitate walking, bicycling, and transit use (Policy 2.C.1 of the Land Use, Community Design, and Historic Preservation Element).

6. Encourages and incentivizes buildings to be constructed so that they consume less energy, water, and other resources; allow natural ventilation; use daylight effectively; reduce stormwater runoff; and facilitate the use of clean energy, whenever possible (Policy 2.C.4 of the Land Use, Community Design, and Historic Preservation Element).

7. Promotes the design of transition areas between different land uses in order to ensure compatibility, and encourage a gradual and compatible shift in scale between different densities and intensities of various uses (Policy 2.E.3 of the Land Use, Community Design, and Historic Preservation Element).

8. Recognizes, maintains, and celebrates the unique qualities of Woodland's traditional residential neighborhoods.

9. Within mixed-use corridors, encourages replacement of older, low-scale, auto-oriented development with well-designed, higher-density, new projects that offer pedestrian orientation, more efficient use of land, and continued, productive economic value (Policy 2.I.2 of the Land Use, Community Design, and Historic Preservation Element).

10. Encourages renovation, infill, and reuse of existing commercial centers (Policy 2.J.1 of the Land Use, Community Design, and Historic Preservation Element).

11. Provides office, industrial, medical, and public employment centers that encourage a range of diverse business and employment opportunities and feature multi-modal commute access.

12. Promotes the development of compact, complete neighborhoods in Specific Plan Areas that locate services and amenities within walking and biking distance of neighborhood residents, reducing the need to travel by car (Policy 2.M.1 of the Land Use, Community Design, and Historic Preservation Element).

13. Requires Specific Plan Areas to incorporate a mix of residential and non-residential development that addresses the basic daily needs of residents and employees and a mix of housing types at a range of densities and affordability levels that accommodate residents at all stages of life (Policies 2.M.2 and 2.M.3 of the Land Use, Community Design, and Historic Preservation Element).

D. Circulation and Mobility Benefits

1. The Transportation and Circulation Element emphasizes the development of new and modified infrastructure that promotes increased transportation choices to serve existing and new development.

2. This Element promotes an integrated, multi-modal transportation system to reduce air pollution and greenhouse gas emissions, reduce the need for costly roadway improvements, and allow residents and business the opportunity to operate, recreate, and move through the city efficiently without an automobile, whenever possible.

3. Promotes "complete streets" that safely and effectively serve the needs of all modes of travel.

4. Requires new development to demonstrate reductions in per-capita vehicle miles traveled (VMT) and peak-period VMT reduction, in particular, to reduce congestion and pollutant emissions (Policy 3.A.4 of the Transportation and Circulation Element).

5. Requires all new development to provide convenient bicycle and pedestrian environments and access through building orientation, site layout, traffic management, and connections to transit service and local commercial and community facilities (Police 3.A.11 of the Transportation and Circulation Element).

6. Promotes walking by providing appropriate facilities, programs, and information (Policy 3.E.1 of the Transportation and Circulation Element).

7. Promotes the development of a comprehensive system of recreational and commuter bicycle routes that provide safe and convenient connections between the city's major employment and housing areas; existing and planned bikeways; and schools, parks, retail shopping, and residential neighborhoods (Policy 3.F.2 of the Transportation and Circulation Element).

8. Promotes a transit system that serves as a viable alternative to the automobile for those without access to a vehicle and those that choose to live and work in areas where land use density and intensity are supportive of transit.

E. Economic Benefits

1. The Economic Development Element promotes a diversified economic base and seeks to capitalize on Woodland's location and assets—access to Interstate 5 (I-5), Sacramento International Airport, rail service, prime farmland, and U.C. Davis—by supporting and assisting business development and mitigating constraints to economic investment.

2. This Element provides sites in a variety of infill and new growth locations to attract hotel, office, industrial, and research and development uses, which in turn will provide jobs and help the City achieve fiscal sustainability.

3. Seeks partnerships in higher education, seed research, agricultural technology, food production, and other locally appropriate sectors.

4. Supports linkages with Woodland's strong historical and cultural resources and promotes tourism.

F. Public Facilities and Services Benefits

1. The Public Facilities and Services Element ensures that police and fire services; parks and recreational facilities and programs; schools; water, recycled water, wastewater, drainage/stormwater, solid waste systems; and other public facilities meet the needs of the community as the city grows.

2. Balances the fiscal realities of providing sustainable public services with community desires for high-quality amenities and facilities to ensure that meeting today's needs does not compromise the community's fiscal future.

3. Requires new development to pay for itself, including new facilities and on-going operations.

4. Provides a comprehensive program of law enforcement services to deter crime, ensure public safety, and meet the growing demand for police services associated with increasing population and non-residential development.

5. Provides a comprehensive program of fire protection services to protect residents of and visitors to Woodland from injury and loss of life and to protect property from fires.

6. Establishes and maintains a complete system of public parks and community and recreational facilities that provides opportunities for both passive and active recreation and is well suited to the needs of Woodland residents, employees, and visitors.

7. Promotes creation of a recreational greenbelt and expansion of walking and biking paths to enable residents to use active transportation options to connect to work, schools, grocery stores, and variety of open spaces.

8. Underscores the importance of high-quality educational opportunities—including K–12 education, higher education, and workforce training.

9. Supports continued partnership with the Woodland Joint Unified School District, the County Office of Education, and Woodland Community College in planning, facility sharing, extracurricular activities and recreation, and promoting academic achievement, as well as linkages between Woodland's growing cluster of agricultural technology and research establishments and higher education.

10. Ensures that potable water capacity (including surface water treatment capacity and aquifer storage and recovery well capacity) is available to serve planned urban development within the Planning Area, consistent with the General Plan.

11. Ensures that adequate wastewater collection, treatment, recycling, and disposal facilities are provided in a timely fashion to serve existing and future needs.

12. Maintains the City's storm drainage system and promotes best management practices to protect from flooding, enhance water quality, prevent infrastructure deterioration, and comply with State and federal laws.

13. Collaborates with affected stakeholders and partners to identify and support programs and new techniques of solid waste disposal, such as recycling, composting, waste-to-energy technology, and waste separation, to reduce the volume and toxicity of solid wastes that must be sent to landfill facilities (Policy 5.J.3 of the Public Facilities and Services Element).

14. Promotes energy-saving practices and encourage energy efficiency through good urban design and site-planning practices, as well as through building design, maintenance, and retrofit (Policy 5.K.6 of the Public Facilities and Services Element).

15. Facilitates the upgrading of utility services and support development of the infrastructure necessary for all residents to use and benefit from improved and emerging technologies in Woodland, including communication technologies (Policy 5.K.7 of the Public Facilities and Services Element).

G. Healthy Community Benefits

1. The Healthy Community Element promotes health equity in Woodland, including the promotion of equal access to health facilities, goods, services, and economic and educational opportunities; helping to ensure overall well-being for residents of all ages, abilities, and incomes; and fairly treating all members of the public in the process of creating a healthy Woodland.

2. This Element supports healthy and active lifestyles for all members of the community by integrating opportunities for active transportation and physical activity into daily life in Woodland.

3. Creates a healthy, balanced, functional, and equitable food system for the entire Woodland community by reducing barriers and increasing access to locally-grown fruits and vegetables, and increasing community-wide knowledge of healthy food choices and behaviors.

4. Supports a wide variety of community facilities and programs to serve and meet the needs of the diverse Woodland community.

5. Supports public art as an important amenity to creating a beautiful and vibrant city.

6. Ensures equal treatment of all community members and equal share in both the benefits and burdens associated with the city's amenities, services, facilities, and land use decisions.

H. Sustainability, Conservation, and Open Space Benefits

1. The Sustainability, Conservation, and Open Space Element focuses on balanced management of the city's multiple natural (water resources, natural habitats, wildlife, vegetation, agricultural soils, minerals, and air quality) and cultural resources.

2. This Element promotes thoughtful planning and resource management that can help inform community discussion about weighing environmental conservation.

3. Seeks to balance planned growth with conservation and enhancement of the area's natural resources.

4. Protects and enhances the natural quantity and qualities of surface water and groundwater resources in the Woodland area by supporting local efforts to establish a Groundwater Sustainability Agency and adopt a Groundwater Management Plan and by supporting local and regional efforts to protect the Sacramento River, Cache Creek, Putah Creek, and Willow Slough watersheds (Policies 7.A.2 and 7.A.3 of the Sustainability, Conservation, and Open Space Element).

5. Requires the use of feasible and practical best management practices and promotes Low Impact Development to protect receiving waters from the adverse effects of construction activities and urban and agricultural runoff (Policy 7.A.4 of the Sustainability, Conservation, and Open Space Element).

6. Supports continued participation in the planning process for the countywide Habitat Conservation Plan/Natural Community Conservation Plan and implementation the adopted Plan to mitigate the impacts of growth projected under the General Plan on plant and wildlife habitats in the Woodland area (Policy 7.B.1 of the Sustainability, Conservation, and Open Space Element).

7. Supports the conservation and preservation of sensitive habitat types (i.e., alkali sink, freshwater wetlands, freshwater marsh, riparian forest, drainages, riverine habitat, and lakes) and habitats of Federally- or State-listed rare, threatened, endangered, and/or other special status species.

8. Permanently protects as open space areas of natural resource value, including wetlands preserves, riparian corridors, woodlands, and floodplains. Supports the maintenance of open space and natural areas that are interconnected and of sufficient size to protect biodiversity, accommodate wildlife movement, and sustain ecosystems (Policy 7.B.5 of the Sustainability, Conservation, and Open Space Element).

9. Supports existing agricultural uses within the ULL until urban development occurs on these properties (Policy 7.C.2 of the Sustainability, Conservation, and Open Space Element).

10. Ensures that urban development within the ULL does not affect the economic viability of adjacent agricultural practices located outside the ULL (Policy 7.C.4 of the Sustainability, Conservation, and Open Space Element).

11. Preserves and protects areas and sites of prehistoric, cultural, and archaeological significance.

12. Requires projects to implement Best Management Practices for reducing air pollutant emissions associated with the construction and operation of development projects (Policy 7.F.2 of the Sustainability, Conservation, and Open Space Element).

13. Maintains inventories of community-wide greenhouse gas emissions and greenhouse gas emissions from City operations and tracks related solid waste, energy, economic, and environmental data and updates the inventories periodically as additional data and methodologies become available (Policy 7.F.7 of the Sustainability, Conservation, and Open Space Element).

I. Safety Benefits

1. The Safety Element ensures that appropriate consideration of both natural and human-made hazards and risks are factored into land use decision-making (including geologic and seismic hazards, flood hazards, wildland fires, hazardous materials, and airport operations).
2. This Element requires the City to continue to implement floodplain zoning and undertake other actions appropriate and/or required to comply with State flood risk management requirements, and to maintain the City's eligibility under the Federal Flood Insurance Program (Policy 8.B.1 of the Safety Element).
3. Requires evaluation of potential flood hazards prior to approval of development projects (Policy 8.B.2 of the Safety Element).
4. Requires the City make explicit findings that either existing flood management facilities provide an adequate level of protection from flooding, the City has conditioned the project to provide an adequate level of protection, or the local flood management agency has made adequate progress on the construction of a flood protection system that will provide adequate protection before approval of subdivisions, development agreements, or permits (Policy 8.B.3 of the Safety Element).
5. Establishes noise compatibility guidelines but acknowledges that planned development in growth areas will be noisy and may exceed those thresholds (Tables 8-5 and 8-6, Policies 8.G.1 and 8.G.2).

J. Housing Benefits

1. The Housing Element demonstrates the City's continued success in providing housing affordable to all economic segments.
2. This Element validates the importance of the City's inclusionary housing requirements.
3. Encourages the preservation, maintenance and improvement of existing housing and the replacement of unsafe or dilapidated housing.
4. Encourages infill development Downtown and along mixed-use corridors.
5. The goals, policies, and programs of this element emphasize a mix of diverse housing opportunities (i.e., larger lot to small-lot single-family homes, townhomes, apartment buildings and lofts) in a variety of locations to meet the needs of all City residents, including those with special housing needs.
6. Demonstrates that planned land uses will satisfy the County's regional housing needs allocation in every category (Table 1-1 of the Housing Element).
7. Has been determined by the California Department of Housing and Community Development to be compliant with state law.

K. 2035 Climate Action Plan Benefits

1. Implements the General Plan guiding principles, goals, and policies, as they relate to GHG emissions reduction.
2. Articulates objectives for the City related to local GHG reductions to support the development of strategies and actions.
3. Provides GHG reduction targets for 2020 and 2035 that allow the City to demonstrate consistency with the State's own long-term GHG reduction targets articulated in Assembly Bill (AB) 32 and Senate Bill (SB) 32 (California Global Warming Solutions Act).
4. Outlines GHG reduction strategies and actions that are appropriate for Woodland's specific context, and that are consistent with the City's other environmental, social, and economic objectives.
5. Establishes a process whereby future plans and projects may evaluate their consistency with the 2035 CAP as an alternative to project-specific GHG emissions analysis under CEQA.
6. Indicates how the City will implement CAP strategies and related actions, track the performance of each measure, and evaluate, update, and amend the CAP over time, so the plan remains effective and current.
7. Ensures compliance with CEQA Guidelines Section 15183.5, Tiering and Streamlining the Analysis of Greenhouse Gas Emissions

V. GENERAL FINDINGS: RECORD OF PROCEEDINGS

A. Final EIR

The Final EIR for the Proposed Project includes the following items:

1. The Draft EIR (State Clearinghouse #2013032015) dated September 15, 2016;
2. Response to Comments on the Draft EIR dated January 23, 2017;
3. Revisions to the Draft EIR dated January 23, 2017; and
4. Mitigation Monitoring and Reporting Program dated January 23, 2017, and subsequently amended May 16, 2017.
5. Errata to the EIR, dated May 16, 2017.

B. The Administrative Record

Public Resources Code section 21167.6(e) sets forth the contents of the administrative record for CEQA purposes and these findings. Pursuant to CEQA Guidelines Section 15091(e), the location and custodian of the documents and other materials which constitute the record of proceedings upon which these decisions are based is as follows:

Woodland Community Development Department
300 First Street
Woodland, CA 95695
(530) 661-5820
www.cityofwoodland.org

VI. FINDINGS REQUIRED UNDER CEQA

Public Resources Code Section 21002 provides that "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects[.]" It also states that the procedures required by CEQA "are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects." And it states that "in the event specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof."

The mandate and principles of Section 21002 are implemented, in part, through the requirement that agencies must adopt findings before approving projects for which EIRs are required. For each significant environmental effect identified in an EIR for a proposed project, the approving agency must issue a written finding reaching one or more of three permissible conclusions. The first such finding is that changes or alterations have been required or incorporated into the project to avoid or substantially lessen the significant environmental effect. Inclusion of mitigating General Plan policies and implementation programs are among the "changes or alterations" referenced in this finding. Other "changes and alterations" are discussed herein. For purposes of these findings, the term "avoid" refers to the effectiveness of one or more mitigation measures to reduce an otherwise significant effect to a less than significant level. In contrast, the term "substantially lessen" refers to the effectiveness of such measure or measures to substantially reduce the severity of a significant effect, but not to reduce that effect to a less-than-significant level.

The second permissible finding is that such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding, and that such changes have been adopted by such other agency or can and should be adopted by such other agency.

The third potential finding is that specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final EIR (CEQA Guidelines Section 15091). "Feasible" means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, legal, and technological factors. The concept of "feasibility" also encompasses the question of whether a particular alternative or mitigation measure promotes the underlying goals and objectives of a project. Moreover, "feasibility" under CEQA encompasses "desirability" to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, legal, and technological factors.

In the process of adopting mitigation, the City Council has made a determination regarding whether the mitigation proposed in the EIR is "feasible." In some cases, modifications may have been made to the mitigating policies and implementation programs to update, clarify, streamline, correct, or make other revisions. These are discussed herein.

With respect to a project for which significant impacts are not avoided or substantially lessened, a public agency, after adopting proper findings, may nevertheless approve the project if the agency first adopts a statement of overriding considerations setting forth the specific reasons in support of the finding that the project benefits outweigh its unavoidable adverse environmental effects. In the process of considering the EIR for certification, the City Council has recognized that impact avoidance is not possible in all instances. To the extent that significant adverse environmental impacts will not be reduced to a less-than-significant level with mitigating policies and implementation programs, the City Council has found that specific economic, social, and other considerations support approval of the Proposed Project. Those findings are reflected herein in Section VI.C (Significant Effects and Mitigation Measures) below and in Section VIII (Statement of Overriding Considerations).

A. Findings Regarding EIR Errata and EIR Recirculation

1. Standard for Recirculation Under CEQA

CEQA Guidelines Section 15088.5 requires a lead agency to recirculate an EIR when "significant new information" is added to the EIR after the lead agency gives public notice of the availability of the Draft EIR but before certification. "Information" may include project changes, changes to the environmental setting, or additional data or other information. The Guidelines do not consider new information to be significant unless the lead agency changes the EIR in a way that deprives the public of a meaningful opportunity to comment on a substantial adverse environmental effect or a feasible way to mitigate the impact that the agency or project proponent has declined to implement.

Section 15088.5 states "significant new information" requiring recirculation may include:

(1) A new significant environmental impact that had not previously been disclosed in the Draft EIR would result from the project or from a new mitigation measure;

(2) A substantial increase in the severity of an environmental impact that had already been identified unless mitigation measures would be adopted to reduce the impact to a level of insignificance;

(3) A feasible project alternative or mitigation measure would considerably lessen the significant environmental impacts of the project, but the proponents will not adopt it; or

(4) The Draft EIR was so inadequate and conclusory that meaningful public review and comment were precluded.

Recirculation is not required if new information added to the EIR just clarifies or makes minor modifications to an otherwise adequate EIR.

2. Changes to the Proposed Project

Since the City released the Draft EIR, and as a result of public input and meetings, the City made various policy and program changes to both the Draft General Plan and Draft Climate Action Plan, including policy and implementation program changes. These various changes are shown in Attachment B to the respective City Council resolutions approving the 2035 General Plan and 2035 Climate Action Plan. The City made numerous non-substantive text changes to the Proposed Project to clarify terms, correct grammatical errors, correct figures, and place headers and other identifying information in the correct places. These changes did not substantively change the text of either the General Plan or Climate Action Plan. Rather, the changes corrected errors and provided additional clarity.

The purpose of most of the substantive changes was to clarify policies and programs, many of which are enhancements to existing policies, and to ensure additional environmental protection. For example, the City modified Policy 8.F.2 to require the City to participate in the next update of the Yolo County Operational Area Multi-Jurisdictional Hazard Mitigation Plan in an effort to address topics related to climate change vulnerability, as required by SB 379. As another example, the City modified Policy 6.B.9 to require an evaluation and enhancement of street lighting along bicycle and pedestrian routes to encourage walking and biking as needed. The City also amended the Proposed Project to add new, or amend existing, policies as directed by the EIR mitigation measures. Changes that incorporate mitigation measures from the EIR do not constitute new information as the changes ensured conformity with the EIR. Additionally, the new or amended policies support goals already in the 2035 General Plan and/or 2035 CAP.

The City Council also made an important decision regarding its growth strategy. The Draft 2035 General Plan and the EIR for the Proposed Project both examined two "equal weight" alternatives, the South Alternative and the East Alternative. While each alternative contemplated the same amount of overall growth city-wide, each alternative contemplated much of the growth in a particular part of the city (either primarily, but not exclusively, to the south or primarily, but not exclusively, to the east). Rather than select either alternative, the City chose to, instead, adopt an alternative growth strategy that is now the 2035 General Plan. That growth strategy recognizes that the General Plan goals and policies prioritize future residential growth through infill along key corridors and downtown as well as prioritizes Spring Lake buildout. Instead of selecting a particular part of the City in which to focus growth, potentially to the exclusion of another area(s), the City Council chooses instead to have inherent physical, financial, and market constraints direct and meter growth in these areas. The maximum number of new housing units (maximum of 7,000 dwelling units), population, and square footage of non-residential space (maximum of 17,386,000 square feet) has not changed. Various growth phasing considerations have been imbedded

as policy considerations. Thus, the Proposed Project provides the City with greater flexibility to consider development opportunities that will provide the most benefit to the community. All decisions regarding future development in new growth areas will rely on a thorough assessment of the specific project proposal and its consistency with the 2035 General Plan goals and policies as well as the 2035 Climate Action Plan and EIR for the Proposed Project.

Due to the City Council's decision to not select either the South or the East Alternative, and to instead have a modified growth strategy, the City modified the 2035 General Plan text and a few of the 2035 General Plan policies. The 2035 General Plan does not have any references to the two alternatives as the public review draft previously did. Instead, the Specific Plan Areas are described as specific areas and not within the context of being permitted to develop pursuant to one of the two alternatives. For example, page LU 2-61 removed all references to the different alternatives and instead describes the three different Specific Plan Areas. These changes are text changes only and do not create an environmental impact or worsen a previously identified environmental effect.

The City substantively modified certain policies to be consistent with its modified growth strategy. The City modified Policy 2.B.1 to provide protections for completion of infrastructure and amenities in existing specific plan areas while they are developing. This modified policy ensures that the appropriate infrastructure analysis is conducted as a specific plan is developing and strengthens the policy to ensure overall environmental protection rather than creating a new, or exacerbating an existing, environmental effect. Additionally, the City modified Policy 2.B.2 to prohibit the processing of any specific plan until the designs for projects to provide necessary 200-year flood protection have been approved and the funding for construction secured. The City Council also modified the policy to require that the City Council approve any sale of the City-owned 900 acres that is a part of SP-2 by a four-fifths vote. This amended policy is to ensure adequate flood protection is consistent with state law related to flood protection. The City made similar changes to Policy 2.L.5 concerning Specific Plan-2 while also encouraging sustainable development with the goal of achieving zero net energy at the building and neighborhood level within SP-2. The City also modified Policy 2.L.1 to clarify that plans to develop new specific plan areas will be independently analyzed for consistency with the 2035 General Plan and to consider site-specific constraints.

The City Council also changed 2035 General Plan Policy 2.A.3 related to agricultural mitigation. The policy now provides that in addition to requiring one acre of agricultural land to be permanently conserved for every acre converted to urban use, the farmland being conserved must be of the same Farmland Mapping and Monitoring Program type as the farmland that is being converted, or of a type of higher quality, and the conserved farmland should be located outside of, but as close to the Woodland Urban Limit Line as possible. It also provides that for projects proposing to convert agricultural land to an urban use, a soils analysis will be required to determine the farmland classification for purposes of determining the appropriate mitigation as a part of the environmental review conducted for the project. This change ensures that agricultural land will be conserved on a like for like basis and that the soil quality will be analyzed at the time a project is proposed for development to ensure that the most accurate analysis is being conducted for the project. This change strengthens the policy and ensures additional environmental protection rather than creating a new, or exacerbating an existing, environmental effect.

During the May 16, 2017 City Council meeting, the City Council approved of three additional clarifying changes to the 2035 General Plan. The first change clarifies that the Neighborhood Commercial (NC) residential requirement is unlimited above the ground floor rather than stating that a revised density for this area is not applicable. This change permits residential uses above commercial development, which is consistent with the City's current practice and does not exacerbate any existing, or create any new,

environmental impacts. The second change clarifies that the Commercial Mixed Use District described on page LU 2-45 of the General Plan is "commercial service" rather than "commercial." This is a minor text change that does not substantively change the text of the General Plan and does not exacerbate an existing or create a new environmental impact. The third change clarifies that the development standard for Neighborhood Commercial (NC) is consistent with changes made on page LU 2-58, Policy 2.J.4 that the maximum square foot floorplate for any single user is 60,000 square feet rather than 25,000 square feet. This change is clerical in nature and does not create a new, or exacerbate an existing, environmental impact.

Given the clarifications to the Proposed Project and the lack of significant changes to the Proposed Project, the environmental impacts from the Proposed Project did not change. While the City now has a modified growth strategy rather than a preferred location to concentrate its growth, the maximum allowable General Plan buildout did not change. Thus, the analysis of significant environmental effects remained the same, and no changes to the EIR were warranted as a result of changes to the Proposed Project. The City Council has as Attachment B to its Resolution Adopting the 2035 General Plan and Attachment B to its Resolution Adopting the 2035 Climate Action Plan all of the changes made to the respective documents. Rather than setting out each of the numerous changes made to the 2035 General Plan and 2035 Climate Action Plan, the City Council hereby incorporates by reference Attachment B to the City Council's Resolution Adopting the 2035 General Plan and Attachment B to the City Council's Resolution Adopting the 2035 Climate Action Plan. The City Council is anticipated to adopt the documents, as amended, subsequent to certifying the EIR.

Finding: None of the changes to the Proposed Project necessitated a change to the EIR. The changes did not create a new significant effect or worsen a previously identified one. The changes do not propose additional new residential units, square footage, or population to be permitted over what the EIR previously analyzed and disclosed. Neither do the changes propose or contemplate growth in a location that the EIR did not analyze. The public has not been deprived of a meaningful opportunity to comment on any new or different environmental impacts and had multiple opportunities to provide input. The numerous changes to the Proposed Project do not require any changes to the EIR; thus, recirculation is not necessary as the changes do not constitute significant new information under CEQA.

3. Changes to the EIR and Errata to FEIR

The City also made numerous changes to the Draft EIR since its release, which are described in Chapter 3, "Revisions to the Draft EIR," of the Final EIR, dated January 23, 2017. Most of the changes to the DEIR clarified text and did not substantively change the EIR. Since the City released the Final EIR, the City made four minor changes to mitigation measures and also amended the Mitigation Monitoring and Reporting Program to take into account these four changes as well as to include Table 2-1 of the Final EIR in it. That errata is included as **Attachment A** to the City Council's Resolution Certifying the EIR for the Proposed Project. The amendments to the four mitigation measures are set forth as follows (new text shown in italics, deleted text shown in strikethrough):

- **Mitigation Measure 4.2-1 – The 2035 General Plan should be amended to include the following modified policy:**
  Policy 2.A.3 Agricultural Mitigation. For impacts to agriculture within the ULL, require one acre to be permanently conserved for every acre converted to urban development *(1:1 ratio)*. The farmland being conserved must be of the same Farmland Mapping and Monitoring Program type (Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance) as the farmland that is being converted, or of a type of higher quality, and the

conserved farmland should be located as close to the Woodland *Urban* L*imit* L*ine* as possible. *For projects proposing to convert agricultural land to urban use, require soils analysis to determine farmland classification for purposes of determining appropriate mitigation as part of environmental review conducted for the project.*

Finding: The City Council finds that this modified Mitigation Measure ensures that farmland being conserved will be of the same quality as the farmland proposed for conversion, and ensures that lesser quality farmland will not be conserved when higher quality farmland will be converted. The revised Mitigation Measure also requires projects that propose to convert agricultural land to have a specific soils analysis prepared to determine the farmland classification, which will ensure that the most accurate analysis is used in determining the environmental impact of the proposed project. This modified Mitigation Measure will not create a new, or worsen an existing, environmental impact.

- **Mitigation Measure 4.2-3 – The 2035 General Plan should be amended to include the following new policy:**
  Policy 7.C.5 Agricultural Buffer. Require new development that occurs at the edge of the ULL to be set back a minimum of ~~300~~ *150* feet from adjacent agricultural land where possible. Equivalent means of providing agricultural buffers may be considered by the Planning Commission on a case by case basis for parcels where development potential would be precluded or severely limited as a result of the required buffer size. The buffer shall be landscaped/vegetated and may include public right of way.

  Finding: This modified Mitigation Measure ensures that a buffer will be in place between new development at the edge of the Urban Limit Line but also continues to provide the City and landowner with flexibility of having an alternative to a buffer if development potential would be precluded or severely limited as a result of the required buffer size. The City Council changed this Mitigation Measure in part to be consistent with neighboring jurisdictions' policies and in part because it recognizes the need for flexibility in addressing required buffers on private property. This modified Mitigation Measure will not create a new, or worsen an existing, environmental impact.

- **Mitigation Measure 4.13-1a – The Draft General Plan should be amended to include the following modification of the Circulation Diagram ~~in the East Alternative~~.**
  ~~East Alternative~~ Circulation Diagram: Include E. Gum Avenue from Bourn Drive to Pioneer Avenue as a 2-lane minor arterial.

  Finding: The modified Mitigation Measure removes the reference to the East Alternative as the City Council chose to pursue a modified growth strategy and is not selecting one direction to grow in over another. This change would not create a new, or exacerbate an existing, environmental impact.

- **Mitigation Measure 4.13-3b – The 2035 General Plan should be amended to include the following modification of the circulation diagram.**
  ~~East Alternative~~ Circulation Diagram: Include County Road 102 from E. Gibson Road to Farmers Central Road as a 4-lane principal arterial.

  Finding: Similar to modified Mitigation Measure 4.13-1a, the modified Mitigation Measure removes the reference to the East Alternative as the City Council chose to pursue a modified

growth strategy and is not selecting one direction to grow in over another. This change would not create a new, or exacerbate an existing, environmental impact.

Due to the City's decision to have a revised growth strategy, the City made a minor change to Impact 4.13-1 to remove the comparative reference to the East Alternative and South Alternative. Similar to the discussion above, this change comports with the City Council's decision to pursue a modified growth strategy rather than growing primarily to the south or to the east and removes the reference to the two alternatives. The change reads as follows:

> IMPACT 4.13-1 Conflict with an Applicable Plan, Ordinance or Policy Establishing Measures of Effectiveness for the Performance of the Circulation System by Resulting in Unacceptable Levels of Service on City of Woodland Roadways. Implementation of the Proposed Project could cause unacceptable LOS conditions on some roadway segments. The impact is considered significant ~~for the East Alternative and less than significant for the South Alternative~~.
>
> Finding: Similar to modified Mitigation Measure 4.13-1a and 4.13-3b, this impact had a finding regarding both the East Alternative and the South Alternative. The removal of the language recognizes the City Council's preferred modified growth strategy but does not add a new impact that had not previously been analyzed or worsen an existing impact. This language change does not constitute significant new information.

Finding: The Woodland City Council finds that the changes identified in the proposed revisions to both the Proposed Project and the EIR do not identify any new impacts or identify any substantial increase in the severity of an environmental impact that would not be reduced to a less than significant level through mitigation; nor would the revised mitigation measures result in new significant environmental impacts. Rather, Mitigation Measure 4.2-1 provides more specificity concerning the process to use when agricultural land is being converted to urban development. It would result in an additional environmental impact or change in severity an existing impact. Mitigation Measure 4.2-3 changes the agricultural buffer from 300 feet to 150 feet and continues to provide an alternative if the buffer is impractical or otherwise not possible. The amended mitigation measure would not cause a new significant environmental impact to result from the amended measure and would cause an increase in the severity of an environmental impact. Amended Mitigation Measures 4.13-1a and 4.13-3b both referred to the East Alternative Circulation Diagram. Given the City Council's growth strategy direction and its decision to not choose between the East Alternative and the South Alternative, these two Mitigation Measures have been amended to refer to the Circulation Diagram for the 2035 General Plan, rather than the East Alternative. Impact 4.13-1 referred to both the East and South Alternatives, distinctions that are no longer applicable in the 2035 General Plan. These changes conform to the City Council's chosen growth strategy and would not result in a significant impact on the environment or increase in intensity any environmental effects. All of the mitigation measures that have been amended since release of the FEIR help clarify and strengthen the effectiveness of the mitigation measures to help further reduce or avoid an impact.

Because no new unmitigated environmental effects have been identified or created by the revised mitigation, and because no new significant information has been added to either the Proposed Project or the EIR, the EIR has not been changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental impact of the Proposed Project. The revisions to the EIR are improvements to the environmental analysis. No impacts identified in the EIR would be substantially increased as a result of changes to the Proposed Project or the EIR. There are no new feasible alternatives or mitigation measures that are considerably different from those considered in the EIR that

the City Council has declined to adopt. Therefore, recirculation of the EIR pursuant to CEQA Guidelines Section 15088.5 is not required.

B. Findings Regarding Specific Environmental Impacts

The Draft EIR identified a number of less than significant impacts associated with the Proposed Project that do not require mitigation. The Draft EIR also identified a number of significant and potentially significant environmental effects (or impacts) that may be caused in whole or in part by the Proposed Project. Some of these significant effects can be fully avoided or substantially lessened through the adoption of feasible mitigation measures. Other effects cannot be, and thus may be significant and unavoidable. For reasons set forth in Section VIII (Statement of Overriding Considerations), however, the City Council has determined that overriding economic, social, and other considerations outweigh the significant, unavoidable effects of the Proposed Project.

The City Council's findings with respect to the Proposed Project's significant effects and mitigation measures are set forth in the Final EIR and these Findings of Fact. The Summary of Findings does not attempt to describe the full analysis of each environmental impact contained in the Final EIR. Please refer to the Draft EIR, the Final EIR, the Final 2035 General Plan, and the Final 2035 CAP for more detail. Each of these documents is incorporated into these findings in their entirety. Without limitation, this incorporation is intended to elaborate on the scope and nature of mitigating policies and implementation programs, the basis for determining the significance of impacts, the comparative analysis of alternatives, and the reasons for approving the 2035 General Plan in spite of the potential for associated significant and unavoidable adverse impacts.

The Summary of Findings provides a summary description of each potentially significant and significant impact, describes the applicable mitigation measures identified in the Final EIR and adopted by the City Council, and states the findings of the City Council regarding the significance of each impact after imposition of the adopted mitigation measures. A full explanation of these environmental findings and conclusions can be found in the Final EIR and associated record (described herein), both of which are incorporated by reference. The City Council hereby ratifies, adopts, and incorporates the analysis and explanation in the record into these findings, and ratifies, adopts, and incorporates in these findings the determinations and conclusions of the Final EIR relating to environmental impacts and mitigation measures, except to the extent any such determinations and conclusions are specifically and expressly modified by these findings.

The following general findings are made by the City Council:

- For all impacts identified as less-than-significant in the EIR, the less-than-significant impact determination is hereby confirmed by the City Council based on the evidence and analysis provided in the record.

- For all adopted mitigation measures, the City Council hereby directs that the stated mitigation measure (or its equivalent) shall be incorporated into the 2035 General Plan and 2035 CAP. The City Council finds that each such measure is appropriate and feasible and will lessen the impact to some degree.

Some of the measures identified in these Findings may also be within the jurisdiction and control of other agencies. To the extent any of the mitigation measures are within the jurisdiction of other agencies, the City Council finds those agencies can and should implement those measures within their jurisdiction and control (CEQA Guidelines Section 15091[a][2]).

1. Findings Regarding Less than Significant Impacts (No Mitigation Required)

CEQA Guidelines Section 15091 does not require specific findings to address environmental effects that an EIR identifies as "no impact" or a "less than significant" impact. Nevertheless, the City Council hereby finds that the Proposed Project would have either no impact or a less than significant impact with respect to a number of environmental topics, as summarized below. Please refer to the Draft EIR, the Final EIR, the Final 2035 General Plan, and the Final 2035 CAP for more detail.

Aesthetics and Visual Resources

Impact 4.1-1: Substantial Adverse Effect on a Scenic Vista.

Finding: The impact is considered **less than significant** (FEIR, p. 4.1-22).

Explanation: Policies in the Proposed Project ensure that impacts on scenic views are minimized. Goal 7.C establishes that the City is responsible for promoting the preservation of agricultural land surrounding the ULL. Policies 2.A.1, 7.B.6, and 7.C.3 reinforce the Urban Limit Line and require the City to work with Yolo County and the City of Davis on an open space buffer and protection of agricultural land around Woodland. Policy 3.A.7 requires the City to promote the use of grid and modified grid street patterns in new neighborhoods, which helps protect views of surrounding agricultural and open space land along transportation corridors. 2035 CAP actions protect open spaces, which provide scenic views, by focusing installation of renewable energy systems on developed land and structures. Implementation of the Proposed Project would change views of farmland from individual parcels, but it would not have a substantial adverse effect on a scenic vista (FEIR, p. 4.1-22).

Impact 4.1-2: Substantially Damage Scenic Resources, Including, but not Limited to, Trees, Rock Outcroppings, and Historic Buildings within a State Scenic Highway.

Finding: The impact is **less than significant** (FEIR, p. 4.1-24).

Explanation: There is no state scenic highway within or in close proximity to the Planning Area. In addition, policies and implementation programs in the Proposed Project require that the City's tree canopy is managed and improved and that historic buildings are preserved. There are no rock outcroppings in the Planning Area (FEIR, p. 4.1-24).

Agriculture and Forestry Resources

Impact 4.2-2: Conflict with Existing Zoning for Agricultural Use, or a Williamson Act Contract.

Finding: The impact is considered **less than significant** (FEIR, p. 4.2-37).

Explanation: There are parcels currently zoned for agricultural use in the Planning Area; however, the 2002 General Plan specifies that the City may allow development on land zoned Agriculture when it is needed for urban development. There are properties adjacent to new growth areas under Williamson Act contracts, but policies in the 2035 General Plan reduce potential impacts on these properties (FEIR, p. 4.2-37).

Air Quality

Impact 4.3-4: Objectionable Odors Affecting a Substantial Number of People.

Finding: The impact is **less than significant** (FEIR, p. 4.3-48).

Explanation: The WPCF headwork facility and pond system are also both odor sources within the City. The headworks area includes an influent pump station, screens, and grit removal, all of which are open to atmosphere and not equipped with any odor controls and odor scrubbers for the headwork area. Although there have been odor abatement options identified in odor studies for the WPCF, the WPCF would incur substantial construction and operations and maintenance costs, and/or diminished operational flexibility in order to avoid future odor impacts. With implementation of proposed policies, the Proposed Project would not result in substantial odor exposure. Policy 7.F.6 requires odors associated with the wastewater treatment plant to be mitigated to acceptable levels in conjunction with planning and development for any land within an odor buffer. The odor buffer zone was developed through an evaluation of odor emissions associated with the WPCF and consideration of wind speeds and wind direction in the area surrounding this facility. Through this study of odor emissions, a buffer was developed, outside of which there would not be substantial odor emissions. The Proposed Project includes policies that would avoid exposure of a substantial number of people to objectionable odors (FEIR, p. 4.3-48).

Biological Resources

Impact 4.4-5: Interference with Wildlife Movement Corridors and Nursery Sites.

Finding: The impact is **less than significant** (FEIR, p. 4.4-51).

Explanation: The Proposed Project plans for development within the Pacific flyway, a major bird migration route. However, buildout of the Proposed Project would not create a barrier to movement of migratory species or alter the character of existing habitat available to migrating birds such that it would no longer function as a migratory corridor (FEIR, p. 4.4-51).

Impact 4.4-6: Conflict with Local Ordinances Protecting Biological Resources.

Finding: The impact is **less than significant** (FEIR, p. 4.4-55).

Explanation: The 2035 General Plan policies and compliance with City ordinance would reduce potential impacts on protected trees (FEIR, p. 4.4-55).

Impact 4.4-8: Substantial Reduction in the Habitat of a Fish or Wildlife Species, Cause a Fish or Wildlife Population to Drop Below Self-Sustaining Levels, Eliminate a Plant or Animal Community, or Substantially Reduce the Number or Restrict the Range of an Endangered, Rare, or Threatened Species.

Finding: The impact is **less than significant** (FEIR, p. 4.4-59).

Explanation: Implementing the Proposed Project would not substantially reduce the habitat of a fish or wildlife species, eliminate a plant or animal community, or substantially reduce the number or restrict the range of any endangered, rare, or threatened species because the majority of known occurrences of special-status species and their habitat would be preserved (FEIR, p. 4.4-59).

Impact 4.5-3: Develop Land Uses or Development Patterns that Cause Wasteful, Inefficient, or Unnecessary Consumption of Energy.

Finding: The impact is **less than significant** (FEIR, p. 4.5-62).

Explanation: With implementation of policies in the 2035 General Plan and reduction strategies in the 2035 CAP, combined with current laws, regulations, and policies, the impact related to the use of energy would be reduced.

The environmental effects associated with the use of energy in the transportation sector, as well as for building energy use and construction, are evaluated in this section, as well as Section 4.3 of the EIR, "Air Quality" and Section 4.11 of the EIR, "Noise and Vibration." Section 4.13 of the EIR, "Transportation and Circulation," summarizes the traffic analysis prepared to support the EIR.

During construction and following buildout of the Proposed Project, energy would be consumed in the forms of fossil fuels and electricity. A large body of existing regulations would have the effect of reducing energy demand and would, then, also reduce potential adverse environmental effects associated with energy demand. The Proposed Project also includes many policies that promote additional energy conservation and savings and that would reduce peak demand and associated environmental effects (FEIR, p. 4.5-62).

Impact 4.5-4: Require or Result in the Construction of New or Expanded Energy Production or Transmission Facilities, the Construction of which Could Cause Significant Environmental Effects.

Finding: The impact is **less than significant** (FEIR, p. 4.5-65).

Explanation: Implementation of the Proposed Project would increases energy demand and would result in the need to extend services and infrastructure to new users in the Planning Area. Policies and implementation programs in the Proposed Project, as well as existing regulations would reduce potential impacts. Construction of facilities would occur within the assumed development footprint of the Proposed Project, and impacts are considered throughout the EIR. There are no additional significant effects that are not already addressed (FEIR, p. 4.5-65).

Geology, Soils, Minerals Resources, and Paleontological Resources

Impact 4.7-1: Seismic Hazards Related to Surface Fault Rupture, Strong Seismic Ground Shaking, and Liquefaction.

Finding: The impact is **less than significant** (FEIR, p. 4.7-27).

Explanation: Development and land use change consistent with the Proposed Project could subject people and structures to hazards associated with strong seismic ground shaking and liquefaction. Implementation of the policies in the 2035 General Plan, and compliance with relevant laws and ordinances, would reduce the potential for loss or damage from seismic hazards (FEIR, p. 4.7-27).

Impact 4.7-2: Impacts Related to Soil Erosion.

Finding: The impact is **less than significant** (FEIR, p. 4.7-29).

Explanation: Land use change under the Proposed Project would result in substantial grading, excavation, and movement of earth associated with site preparation activities. These activities would increase soil erosion, especially from wind and water, and the potential for siltation of local drainages. Implementation of the policies in the Proposed Project, combined with relevant laws and ordinances, would reduce the potential for soil erosion (FEIR, p. 4.7-29).

Hazards and Hazardous Materials

Impact 4.8-1: Create a Significant Hazard to the Public or the Environment through the Routine Transport, Use, or Disposal of Hazardous Materials.

Finding: The impact is **less than significant** (FEIR, p. 4.8-31).

Explanation: Implementation of the Proposed Project could create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. However, existing regulations and proposed policies in the Proposed Project would address this potential risk and the impact is considered less than significant (FEIR, p. 4.8-31).

Impact 4.8-2: Create a Significant Hazard to the Public or the Environment through Reasonably Foreseeable Upset and Accident Conditions Involving the Release of Hazardous Materials into the Environment.

Finding: The impact is **less than significant** (FEIR, pp. 4.8-33 and 4.8-34).

Explanation: Implementation of the Proposed Project plans for a wide variety of uses, including commercial and industrial uses that could result in upset and accident conditions involving the release of hazardous materials into the environment. Individual projects under the Proposed Project for which there are potential significant impacts related to hazards would require a project-level environmental review at the time they are proposed. With existing regulations and Proposed Project goals and policies, the impact is considered less than significant (FEIR, pp. 4.8-33 and 4.8-34).

Impact 4.8-3: Emit Hazardous Emissions or Handle Hazardous or Acutely Hazardous Materials, Substances, or Waste within One-Quarter Mile of an Existing or Proposed School.

Finding: The impact is **less than significant** (FEIR, p. 4.8-38).

Explanation: Projects that could potentially occur under the Proposed Project could emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. However, existing regulations provide standards for uses involving the handling or emissions of hazardous materials within a quarter mile of schools (FEIR, p. 4.8-38).

Impact 4.8-4: Be Located on a Site Which Is Included on a List of Hazardous Materials Sites Compiled Pursuant to Government Code Section 65962.5 and, as a Result, Would Create a Significant Hazard to the Public or the Environment.

Finding: The impact is **less than significant** (FEIR, p. 4.8-40).

Explanation: Implementation of the Proposed Project could involve changes to sites included on a list of hazardous materials sites compiled pursuant to Government Code 64964.5. However, with existing

regulations and Proposed Project goals and policies, the impact is considered less than significant (FEIR, p. 4.8-40).

Impact 4.8-5: For a Project Located within and Airport Land Use Plan or, where such a Plan has Not Been Adopted, within Two Miles of a Public Airport or Public Use Airport, Would the Project Result in a Safety Hazard For People Residing or Working within an Airport Land Use Plan Area.

Finding: The impact is **less than significant** (FEIR, p. 4.8-41).

Explanation: A portion of the Planning Area is in the SMF Airport Influence Area. The 2035 General Plan includes policies to avoid any adverse impact (FEIR, p. 4.8-41).

Impact 4.8-6: Impair Implementation of or Physically Interfere with an Adopted Emergency Response Plan or Emergency Evacuation Plan.

Finding: The impact is **less than significant** (FEIR, p. 4.8-43).

Explanation: Proposed Project policies support the mitigation of and preparation for emergencies (FEIR, p. 4.8-43).

Impact 4.8-7: Expose People or Structures to a Significant Risk of Loss, Injury or Death Involving Wildland Fires, Including Where Wildlands are Adjacent to Urbanized Areas or Where Residences are Intermixed with Wildlands. Most of the Planning Area is non-wildland/non-urban area that is not at risk for wildland fires.

Finding: The impact is **less than significant** (FEIR, p. 4.8-46).

Explanation: Implementation of the Proposed Project would result in new development in SP-1A, which is adjacent to a Moderate Fire Hazard Severity Zone. However, existing regulations related to fire flow, access, and clearances around structures would ensure a less than significant impact (FEIR, p. 4.8-46).

Hydrology, Flooding, and Water Quality

Impact 4.9-4: Interference with Groundwater Recharge or Substantial Depletion of Groundwater Supplies.

Finding: The impact is **less than significant** (FEIR, p. 4.9-50).

Explanation: Land use changes under the Proposed Project would result in additional impervious surfaces, which could reduce the amount of groundwater recharge and in turn, affect the yield of hydrologically connected wells. However, a substantial reduction in groundwater recharge is not anticipated. An increase in water demands and associated depletion of groundwater supplies could also result from the land use changes under the Proposed Project; however, access to new surface water supplies and opportunities for conjunctive use through aquifer storage and recovery would result in a reduced reliance on groundwater supplies. With compliance with existing regulations and implementation of Proposed Project policies, this impact is considered less than significant (FEIR, p. 4.9-50).

Impact 4.9-5: Place Housing Within a 100-Year Flood Hazard Area As Mapped on a Federal Flood Hazard Boundary Or Flood Insurance Rate Map or Other Flood Hazard Delineation Map.

Finding: The impact is **less than significant** (FEIR, p. 4.9-58).

Explanation: Implementation of the Proposed Project would place housing in new growth areas within a current 100-year flood hazard area only if a funded, comprehensive flood solution is secured. Additional policies in the Proposed Project limit the flooding risks of infill development (FEIR, p. 4.9-58).

Impact 4.9-6: Place Within a 200-year Flood Hazard Areas Structures Which Would Impede or Redirect Flood Flows.

Finding: The impact is **less than significant** (FEIR, p. 4.9-60).

Explanation: Implementation of the Proposed Project would place structures within a 200-year flood hazard area; however, policies in the Proposed Project prohibit diversion of flood flows onto adjacent properties (FEIR, p. 4.9-60).

Land Use Planning, Population, and Housing

Impact 4.10-1: Physically Divide an Established Community.

Finding: The impact is **less than significant** (FEIR, p. 4.10-24).

Explanation: Goal 2.E establishes that the City must foster patterns and scales of development that encourage neighborhood interaction, which will reduce the potential for isolation and division of communities. Policy 2.A.8 requires the City to transform corridors to connect neighborhoods, and Policy 3.A.10 requires the City to eliminate barriers and gaps in the existing transportation network to improve multi-modal connectivity. Policies 2.I.6 and 3.I.5 require the City to pursue the option of relocating the railroads in the City to locations outside of existing neighborhoods. Policy 3.A.8 discourages the construction of six-lane roads, which due to their width have the potential to divide communities. Policy 3.I.1 requires the City to work with Yolo County on developing truck routes for areas adjacent to the City, rather than through the City, which would otherwise have a greater potential to impact existing communities. The Proposed Project does not include new investment in infrastructure or development that would physically divide existing communities. In addition, the 2035 General Plan includes policies that reduce the potential for impact, by requiring the City to use corridors to connect neighborhoods, discourage wide highways, and locate truck routes outside of the city. Implementation of the Proposed Project would not physically divide an established community (FEIR, p. 4.10-24).

Impact 4.10-2: Conflict with Any Applicable Land Use Plan, Policy, or Regulation of an Agency with Jurisdiction over the Project (Including, but not Limited to the General Plan, Specific Plan, Local Coastal Program, or Zoning Ordinance).

Finding: The impact is **less than significant** (FEIR, p. 4.10-26).

Explanation: The 2035 General Plan proposes land use designations of unincorporated county land that differ from the land use designations in the Yolo County 2030 General Plan. Until the unincorporated land in the Planning Area is annexed, the County's general plan and land use regulations apply (FEIR, p. 4.10-26).

Impact 4.10-4: Displace substantial numbers of people or existing housing, necessitating the construction of replacement housing elsewhere.

Finding: The impact is **less than significant** (FEIR, p. 4.10-32).

Explanation: Policy 9.A.3 promotes the provision of adequate housing for all persons in the City by ensuring there is sufficient land for residential development and that it is zoned for a variety of housing types. Policies 9.B.1 and 9.D.2 promote infill development and the repair, rehabilitation, and retention of existing housing in the city thereby conserving existing housing stock and minimizing the displacement of existing people.

Compliance with the Proposed Project policies would ensure that new development pursuant to the Proposed Project would not displace substantial numbers of people. Implementation of the Proposed Project would result in the construction of 7,000 residential dwelling units on the project site. Although the Proposed Project is not expected to result in substantial displacement, if there is unanticipated displacement, construction of 7,000 residential dwelling units would provide housing for any displaced residents.

In addition, should any redevelopment of existing housing units be proposed, California Public Resources Code Section 7260(b), the California Relocation Law, establishes "a uniform policy for the fair and equitable treatment of persons displaced as a direct result of programs or projects undertaken by a public entity." The law requires public entities to prepare a relocation plan, provide relocation payments, and identify substitute housing opportunities for any resident that would be displaced by a proposed project. Privately funded projects would have no such requirement.

The Proposed Project does not propose converting established residential areas to a nonresidential land use or changing the land use or development character of existing developed residential areas. However, if any housing or residences are displaced, it is assumed that construction of 7,000 residential dwelling units on the project site would fully replace any residential units removed and provide housing for any displaced residents (FEIR, p. 4.10-32).

Noise and Vibration

Impact 4.11-4: Expose People to Excessive Airport Noise.

Finding: The impact is **less than significant** (FEIR, pp. 4.11-63 and 4.11-64).

Explanation: The closest airport to the Planning Area is the Watts Woodland Airport, which is located 3.7 miles from the western city limits. The Sacramento International Airport is located approximately five miles northeast and Yolo County Airport approximately five miles southwest of the City limits. Based upon the most recent noise contours for the Watts Woodland and Yolo County Airports contained within the Yolo County 2030 General Plan EIR (April 2009) and recent noise contours obtained from Sacramento International Airport Master Plan 2004, areas within the City's Urban Limit Line are located outside of the 60 dB CNEL contours.

The Planning Area is outside of the 60 dB CNEL contours of all nearby airports (FEIR, pp. 4.11-63 and 4.11-64).

Public Services and Recreation

Impact 4.12-1: Impacts Related to Fire Protection Services.

Finding: The impact is **less than significant** (FEIR, p. 4.12-32).

Explanation: Implementation of the Proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 time or other performance objectives for fire protection (FEIR, p. 4.12-32).

Impact 4.12-2: Impacts Related to Police Protection Services.

Finding: The impact is **less than significant** (FEIR, p. 4.12-35).

Explanation: Implementation of the Proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 time or other performance objectives for police protection (FEIR, p. 4.12-35).

Impact 4.12-4: Impacts Related to Parks and Recreation Services.

Finding: The impact is **less than significant** (FEIR, p. 4.12-43).

Explanation: Implementation of the Proposed Project would require the provision of 5.0 acres of parkland per 1,000. The Proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 time or other performance objectives for parks (FEIR, p. 4.12-43).

Impact 4.12-6: Impacts Related to Increased Use of Existing Parks and Recreational Facilities.

Finding: The impact is **less than significant** (FEIR, p. 4.12-48).

Explanation: Implementation of the Proposed Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated (FEIR, p. 4.12-48).

Impact 4.12-7: Impacts Related to Recreational Facilities.

Finding: The impact is **less than significant** (FEIR, p. 4.12-52).

Explanation: Implementation of the Proposed Project would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment (FEIR, p. 4.12-52).

Transportation and Circulation

Impact 4.13-4: Conflict with an Applicable Plan, Ordinance, or Policy Establishing Measures of Effectiveness for the Performance of the Circulation System, Taking into Account All Modes of Transportation.

Finding: The impact is **less than significant** (FEIR, p. 4.13-27).

Explanation: The 2035 General Plan and 2035 CAP contain numerous goals, policies, implementation programs, strategies, and actions that are largely taken directly or derived from these adopted plans with regards to transit, bicycling, and walking. Further, this update to the General Plan complies with Assembly Bill (AB) 1358 requiring cities and counties to include a complete streets policy in their general plans, which stresses balance and compatibility across modes. Implementation of the Proposed Project would not result in conflicts with applicable plans, ordinances or policies that have not already been discussed in Impacts 4.13-1 through 4.13-3 (FEIR, p. 4.13-27).

Impact 4.13-5: Result in Changes to Air Traffic Patterns.

Finding: The impact is **less than significant** (FEIR, p. 4.13-29).

Explanation: Implementation of the Proposed Project includes land use changes that would have only a limited influence on air traffic patterns (FEIR, p. 4.13-29).

Impact 4.13-6: Substantially Increase Hazards Due to a Design Feature.

Finding: The impact is **less than significant** (FEIR, p. 4.13-30).

Explanation: The Proposed Project would not increase hazards due to design features of transportation facilities. All existing facility modifications and new facilities resulting from the circulation diagram proposed improvements would be constructed to *City of Woodland Community Design Standards* that have been developed to minimize the potential for conflicts or collisions. Implementation of the Proposed Project will modify the existing transportation network to accommodate existing and future users that could change existing travel patterns or traveler expectations (FEIR, p. 4.13-30).

Impact 4.13-7: Result in Inadequate Emergency Access.

Finding: The impact is **less than significant** (FEIR, p. 4.13-31).

Explanation: The Proposed Project contains policies that are designed to ensure adequate facilities and services are provided for under daily and emergency response conditions. Responsibility for building and maintaining adequate facilities extends to development projects through these policies to ensure that changes to facilities and services are planned in accordance with growth over time. Implementation of the Proposed Project will alter land use patterns and increase travel demand on the transportation network that may influence emergency access (FEIR, p. 4.13-31).

Impact 4.13-8: Result in Potential Conflicts with Adopted Policies, Plans, or Programs Regarding Public Transit, Bicycle, or Pedestrian Facilities, or Otherwise Decrease the Performance or Safety of Such Facilities.

Finding: The impact is **less than significant** (FEIR, p. 4.13-33).

Explanation: The Proposed Project goals and policies are designed to accommodate the new travel demand by providing adequate facilities and services including complete streets. Implementation of the Proposed Project would not disrupt any existing, or interfere with any planned, transit, bicycle, or pedestrian facilities or services. Implementation of the Proposed Project would not result in conflicts with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities (FEIR, p. 4.13-33).

Utilities

Impact 4.14-1: Exceed Wastewater Treatment Requirements of the Applicable Regional Water Quality Control Board.

Finding: The impact is **less than significant** (FEIR, p. 4.14-36).

Explanation: In addition to existing regulations at the federal, State, and local levels that reduce the potential environmental impact, 2035 General Plan Goal 5.H ensures that wastewater treatment facilities are provided in a timely fashion to serve existing and future needs. 2035 General Plan Policy 5.H.6 requires all sewage generators within its service area to connect to the City's system, except those areas where the City has determined a connection to the City's sewage collection system would be infeasible. Woodland Municipal Code, Chapter 23C, Article VI requires all buildings to connect to the public sewer system, thus prohibiting the use of individual sewer systems, which are more likely to leak and contaminate water. However, in exceptional circumstances, the Municipal Code allows the City Council to permit continued use of or construction of a septic system, in accordance with the City engineer and county health officer. The Municipal Code also establishes design, construction, and maintenance standards of connections to the public sewer system. Additionally, the 2035 CAP supports increased efficiency in the wastewater system.

2035 General Plan Policies 5.F.1, 5.H.1 and 4.C.10 ensure that there would be sufficient public services, including wastewater treatment facility capacity, to serve existing and new development in Woodland. Policies 5.F.2, 5.F.3, 5.F.4, and 5.F.5 address fiscal and funding impacts of new development to ensure there is funding available to support public facilities and services. Policies 5.H.2, 5.H.3, 5.H.4, and 5.H.5 address the need to plan for wastewater needs by requiring updates to the Sanitary Sewer Management Plan, consideration of the wastewater needs in amendments to the adopted General Plan, active planning for maintenance and repairs, and evaluation and updates to the Capital Improvement Program. Policy 5.H.9 requires a reduction in wastewater system demand, and Police 5.H.10 requires continuation of the industrial pretreatment program. Implementation of the Proposed Project would not exceed wastewater treatment requirements of the Central Valley Regional Water Quality Control Board (FEIR, p. 4.14-36).

Impact 4.14-2: Require or Result in the Construction of New Water or Wastewater Treatment Facilities or Expansion of Existing Facilities, the Construction of Which Could Cause Significant Environmental Effects.

Finding: The impact is **less than significant** (FEIR, p. 4.14-42).

Explanation: Policies listed under Impact 4.14-1 reduce demand for wastewater facilities and ensure adequate wastewater treatment facilities are in place before development occurs. Other 2035 General Plan goals and policies strive to reduce water use and ensure water system facilities are provided. Goal 5.G is

to provide an adequate potable water supply and delivery system to meet the needs of the City. 2035 General Plan Policy 5.G.1 directs the City to provide an adequate water supply, while Policy 5.G.3 requires connection to the City's water system, unless the City has determined a connection to the City's potable water system would be infeasible. Policy 5.G.2 requires preparation of a Water Supply Assessment for significant projects. Policy 5.G.4 requires periodic updates to the UWMP and the Groundwater Management Plan and is implemented by Implementation Program 5.6. Policy 5.G.6 requires that water production and supply facilities are in place as a condition of development approval, and is implemented by Implementation Program 5.8. Updates to the Capital Improvement Program to ensure delivery of necessary water infrastructure are supported by Policy 5.G.8 and Implementation Program 5.9. Policies 5.G.5, 5.G.7, 5.G.9, and 7.A.5 reduce the demand on potable water production and delivery systems by requiring the expansion of the recycled water system, maintenance of existing facilities, coordination with regional partners to improve water efficiency and conservation, and updated landscaping regulations. Policy 7.A.1 requires the City to continue to cooperate with partners on the Surface Water Project to maintain its surface water supply. Policy 7.A.5 encourages efficient use of water in landscaping. The CAP sets an Objective to support reduced water demand, which is supported by a number of Actions. With compliance with existing and future local, State, and federal regulations and the Proposed Project goals and policies and the CAP objective, the potential impact will be reduced.

Implementation of the Proposed Project would not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects (FEIR, p. 4.14-42).

Impact 4.14-3: Impacts Related to Construction or Expansion of Stormwater Facilities.

Finding: The impact is **less than significant** (FEIR, p. 4.14-46).

Explanation: The 2035 General Plan includes policies to reduce the demand for stormwater facilities and requires mitigation of impacts from projects. Policy 5.I.4 in the 2035 General Plan reduces demand for new stormwater drain capacity by requiring new development to incorporate low impact development features such as canopy trees and permeable paving. In addition, Policies 5.I.1, 5.I.3, 5.I.5, 5.I.7, 5.I.8, and 5.I.9 set standards for new storm drainage, the use of stormwater, and stormwater detention facilities. Policy 5.I.6 requires adequate financing of stormwater management. Supported by Implementation Program 5.11, Policy 5.I.2 ensures that Woodland's Storm Drainage Facilities Master Plan is updated as needed. The CAP also includes an action under Municipal Operations Objective 2 to reduce the need for increased stormwater pumping and reduce stormwater runoff.

Implementation of the Proposed Project would not require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which would cause significant environmental effects (FEIR, p. 4.14-46).

Impact 4.14-4: Water Supply Impacts.

Finding: The impact is **less than significant** (FEIR, p. 4.14-49).

Explanation: According to the Woodland 2015 Urban Water Management Plan, Woodland's surface water availability in 2035 is expected to meet the demand. It is expected that there will be sufficient water supplies available to serve the Proposed Project from existing entitlements and resources. In addition, the CAP includes goals and actions to reduce reliance on potable water supply and promote water conservation. The 2035 General Plan includes goals and policies requiring the promotion of water

conservation to reduce impacts and the protection of water quality. Goal 7.A protects the qualities and quantities of water resources. Policy 7.4.A supports watershed protection efforts. Policies 7.A.2 and 7.A.4 require strategic groundwater management and use of best management practices to protect water quality and are supported by Implementation Program 7.1.

In 2007, the Supreme Court issued a decision on the requirements for the water supply analysis in a land use plan EIR. The decision in the case, *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova*, 40 Cal. 4th 412 (2007), states that CEQA requires an EIR to show a likelihood of water availability. The court stated that the water supply does not have to be available during the adoption of the land use plan, but the water supply analysis must not rely on uncertain assumptions and must not ignore long-term demand. Based on the projections in the Woodland UWMP, there is likelihood that water will be available at least until 2035 to serve the demand from implementation of the Proposed Project.

Implementation of the Proposed Project would not result in having insufficient water supplies available to serve the project from existing entitlements and resources, nor are new or expanded entitlements needed (FEIR, p. 4.14-49).

Impact 4.14-5: Wastewater Treatment Capacity Impacts.

Finding: The impact is **less than significant** (FEIR, p. 4.14-51).

Explanation: The policies in the 2035 General Plan minimize potential impact by requiring adequate public facilities and services for all new and existing development in the Planning Area, including wastewater treatment facilities. The City's Water Pollution Control Facility has the capacity to handle wastewater generated from approximately 70,000 residents and can be expanded to accommodate 105,000 residents. WPCF upgrades to accommodate additional future growth in the Planning Area will be made as needed by the City over the horizon of the Proposed Project.

Implementation of the Proposed Project would not result in inadequate capacity to serve the Proposed Project's projected demand (FEIR, p. 4.14-51).

Impact 4.14-6: Solid Waste Disposal Capacity Impacts.

Finding: The impact is **less than significant** (FEIR, pp. 4.14-54 and 4.14-55).

Explanation: Development under the Proposed Project would be served by a landfill with sufficient permitted capacity to serve the project's solid waste disposal needs (FEIR, pp. 4.14-54 and 4.14-55).

Impact 4.14-7: Compliance with Federal, State, and Local Statutes and Regulations Related to Solid Waste.

Finding: The impact is **less than significant** (FEIR, p. 4.14-56).

Explanation: Policies 5.J.1 and 5.J.2 require adequate solid waste services and compliance of solid waste collection in new development with local regulations, and Policy 5.J.4 requires compliance with State regulation. Implementation of the Proposed Project would be compliant with federal, State, and local statutes and regulations related to solid waste (FEIR, p. 4.14-56).

2. Findings Regarding Impacts Mitigated to a Level of Less than Significant

The City Council hereby finds that feasible mitigation measures have been identified in the EIR and these Findings of Fact that will avoid or substantially lessen the following potentially significant environmental impacts to a less than significant level. The potentially significant impacts and the mitigation measures that will reduce them to a less-than-significant level are summarized below. Please refer to the Draft EIR, the Final EIR, the Final 2035 General Plan, and the Final 2035 CAP for more detail.

Air Quality

Impact 4.3-3: Expose Sensitive Receptors to Substantial Pollutant Concentrations (Construction Related).

Finding: **Less than significant with mitigation** (FEIR, pp. 4.3-44 and 4.3-45).

Explanation: During construction and operation of the Proposed Project, localized air quality emissions would be generated that could affect existing and proposed sensitive receptors. Construction activities would generate diesel particulate matter (diesel PM) emissions that could affect existing and proposed sensitive receptors. Existing regulations and proposed policies and implementation programs would reduce potential exposure to substantial pollutant concentrations. The impact is potentially significant for construction activities and mitigation is identified (FEIR, p. 4.3-43).

> Mitigation Measure 4.3-3d – The 2035 General Plan should be amended to include the following new implementation program (Implementation Program Air Quality 3)
>
> a. New development that would require the use of diesel-fueled construction equipment within 300 feet of an existing sensitive receptor use an equipment mix, incorporate buffering, schedule construction activities, or use other strategies to reduce potential health risk consistent with guidance from the Yolo-Solano Air Quality Management District.
>
> b. Alternatively, a project applicant may prepare a site-specific estimate of diesel PM emissions associated with total construction activities and evaluate for health risk impact on existing sensitive receptors in order to demonstrate that applicable YSAQMD-recommended thresholds for toxic air contaminants would not be exceeded or that applicable thresholds would not be exceeded with the application of alternative mitigation techniques approved by the City.

Implementation Program Air Quality 3 includes as an option to use an equipment mix, including the use of Tier 4 engine emission standards, which has been shown to reduce PM emissions by more than 90 percent from current levels or site-specific analysis and mitigation with clear performance outcomes tied to YSAQMD-recommended thresholds. With the incorporation of mitigation, the TAC impact attributable to construction activities would be less than significant (FEIR, pp. 4.3-44 and 4.3-45).

Biological Resources

Impact 4.4-1: Loss of Special-status Plants and Loss of Special-status Plant Habitat.

Finding: **Less than significant with mitigation** (FEIR, p. 4.4-36).

Explanation: Implementation of the Proposed Project would result in conversion of habitat for special-status plant species, which could result in loss of special-status plants either through direct removal or

through habitat degradation. The impact is potentially significant and mitigation is identified (FEIR, pp. 4.4-34 through 4.4-36).

Mitigation Measure 4.4-1a – The 2035 General Plan should be amended to include the following new implementation program (Implementation Program Biological Resources 1)

a. The City will require biological inventory surveys for new developments that could affect special-status species or sensitive habitat in areas designated for development under the General Plan.

b. The City will work with project applicants to identify opportunities to preserve special-status species occurrences and sensitive habitats through design and planning. If the HCP/NCCP is adopted and state and federal Incidental Take Permits (ITPs) have been issued, the City shall implement the applicable requirements of the HCP/NCCP as relevant to any specific land use project. If the HCP/NCCP is not in place and/or ITPs have not been issued, the City shall follow the steps described below.

c. If the City determines it is reasonable and feasible to do so, while still achieving the specific project development goals and objectives, the City will require preservation of occupied special-status species habitat and sensitive habitat types as a condition of project approval. If adverse effects cannot be avoided, project proponents shall be required to mitigate all adverse effects in accordance with guidance from the appropriate state or federal agency charged with the protection of the subject species and habitat, including surveys conducted according to applicable standards and protocols, where necessary, implementation of impact minimization measures based on accepted standards and guidelines and best available science, and compensatory mitigation for unavoidable loss of special-status species and sensitive habitats.

d. If the project would result in take of state or federally listed species, the City will require project proponent/s to obtain take authorization from the U.S. Fish & Wildlife Service (USFWS) or the California Department of Fish and Wildlife (CDFW), as appropriate, depending on species status, and comply with all conditions of the take authorization.

e. If the Yolo HCP/NCCP is not adopted or the affected species or habitat is not covered under the plan, the City will require project applicants to develop a mitigation and monitoring plan, in coordination with CDFW and/or USFWS, as appropriate depending on species status, to compensate for the loss of special-status species and sensitive habitats. The mitigation and monitoring plan will describe in detail how loss of special-status species or sensitive habitats shall be avoided or offset, including details on restoration and creation of habitat, compensation for the temporal loss of habitat, management and monitoring to avoid indirect habitat degradation (e.g., management of invasive plant species, maintenance of required hydrology), success criteria ensuring that habitat function goals and objectives are met and target special-status species are established, performance standards to ensure success, and remedial actions if performance standards are not met. The plan will include detailed information on the habitats present within the preservation and mitigation areas, the long-term management and monitoring of these habitats, legal protection for the preservation and mitigation areas (e.g., conservation easement, declaration of restrictions), and funding mechanism information (e.g., endowment).

f. If available, purchase of mitigation credits at an agency-approved mitigation bank (i.e., approved by the agency with jurisdiction over the affected species or habitat) in Yolo County, will be acceptable for compensatory mitigation for special-status species that are not covered under the Yolo HCP/NCCP.

Mitigation Measure 4.4-1b – Policy 7.B.5., Policy 7.B.7, and Policy 7.B.11 should be amended as follows:

Policy 7.B.5 Open Space for Conservation. Where appropriate, permanently protect as open space areas of natural resource value, including sensitive habitat types (e.g., alkali sink and prairie, freshwater wetlands, freshwater marsh, riparian forest, drainages), wetland preserves, riparian corridors, woodlands, special-status plant occurrences, and floodplains. Support the maintenance of open space and natural areas that are interconnected and of sufficient size to protect biodiversity, accommodate wildlife movement, and sustain ecosystems. Maintain connectivity between open space areas designated for habitat conservation values within the Planning Area as well as linkages to adjacent habitats outside of the Planning Area, such as Willow Slough, Cache Creek, and habitat preserves to the east.

Policy 7.B.7 Woodland Regional Park. Protect and maintain Woodland Regional Park as an important wildlife preserve and habitat for special-status plants and allow for public access that is compatible with and promotes public education of the site's habitat value.

Policy 7.B.11 Sensitive Site Planning. Site new development to maximize the protection of native tree species and special-status plant and wildlife habitats.

Implementation of these mitigation measures combined with current laws, regulations, and policies would reduce impacts because the General Plan would preserve the majority of the known special-status plant occurrences and suitable habitat in the Planning Area, within designated Open Space land uses that would be protected under permanent conservation easements. These provisions would require new developments to identify and avoid special-status plant populations and their habitats to the extent feasible and compensate for the loss of special-status plants through establishment of new populations or other appropriate measures in coordination with state and federal agencies (FEIR, p. 4.4-36).

Impact 4.4-2: Loss and Degradation of Habitat for Special-status Wildlife Species and Potential Direct Take of Individuals.

Finding: **Less than significant with mitigation** (FEIR, p. 4.4-44).

Explanation: Implementation of the Proposed Project would allow conversion of undeveloped land that currently supports known occupied and potential habitat for special-status wildlife species to residential, commercial, and other developed land uses. Buildout of the Proposed Project would result in loss and degradation of suitable habitat for several special-status wildlife species and could result in take of State- and Federally-listed wildlife species and loss or displacement of special-status wildlife populations. However, implementation of the 2035 General Plan policies and implementation program and compliance with state and federal laws, along with the General Plan Land Use Diagram would reduce potential impacts on special-status wildlife species. The impact is potentially significant and mitigation is identified (FEIR, p. 4.4-44).

Mitigation Measure 4.4-2a – Policy 7.B.6 and 7.B.8 should be incorporated as follows:

Policy 7.B.6. Open Space Buffer. Continue to work with Yolo County and the City of Davis to maintain the permanent open space buffer between County Roads 27 and 29 and its existing wildlife habitat values.

Policy 7.B.8 Native and Compatible Non-Native Plant Species. Require developers to use native and compatible non-native species, especially drought-resistant species, to the extent possible in order to preserve the visual integrity of the landscape, provide benefits for native wildlife, and ensure that a variety of plants suited to the region are maintained.

Mitigation Measure 4.4-2b – Implement Mitigation Measure 4.4.1a

Mitigation Measure 4.4-2c – Implement Mitigation Measure 4.4.1b

With implementation of these changes, impacts would be reduced because these provisions would preserve the majority of sensitive habitats (e.g., alkali prairie and vernal pools) that could support special-status wildlife within the Open Space land use designation, would require development projects to identify and avoid special-status wildlife or provide compensation for loss of habitat (FEIR, p. 4.4-44).

Impact 4.4-3: Loss and Degradation of Riparian Habitat or Other Sensitive Natural Communities.

Finding: **Less than significant with mitigation** (FEIR, p. 4.4-47).

Explanation: Implementation of the Proposed Project would result in conversion of undeveloped land that currently supports a limited amount of riparian habitat and possibly remnant alkali prairie to residential, commercial, and other developed land uses. (All other sensitive natural communities, including vernal pool habitats and other freshwater wetlands found in the Planning Area are addressed under impacts on federally protected wetlands and are not discussed here.) Therefore, buildout of the Proposed Project could result in loss and degradation of riparian or alkali prairie habitat. However, implementation of the 2035 General Plan policies and implementation programs and compliance with state and federal laws, along with the General Plan Land Use Diagram would reduce potential impacts on riparian habitat and other sensitive natural communities. The impact is potentially significant and mitigation is identified (FEIR, pp. 4.4-46 and 4.4-47).

Mitigation Measure 4.4-3a – The 2035 General Plan should be amended to include the following new implementation program (Implementation Program Biological Resources 3):
If the project would result in fill or alteration of a waterway or any body of water supporting riparian forest habitat, the City will require project proponent/s to notify the California Department of Fish and Wildlife, obtain a Lake and Streambed Alteration Agreement if determined necessary by the California Department of Fish and Wildlife, and comply with all conditions of the Lake and Streambed Alteration Agreement.

Mitigation Measure 4.4-3b – Implement Mitigation Measure 4.4-1a

Mitigation Measure 4.4-3c – Implement Mitigation Measure 4.4-1b

Mitigation Measure 4.4-3d – Implement Mitigation Measure 4.4-2a

With implementation of these changes, impacts would be reduced because these provisions would preserve the majority of sensitive habitats (e.g., alkali prairie and riparian forest) within the Open Space land use designation, and would require development projects to identify and avoid sensitive habitats or provide compensation for loss of habitat (FEIR, p. 4.4-47).

Impact 4.4-4: Loss and Degradation of Federally Protected Wetlands.

Finding: **Less than significant with mitigation** (FEIR, p. 4.4-50).

Explanation: Implementation of the Proposed Project would result in conversion of land that currently supports waterways and ponds and may support freshwater marsh, vernal pools, and other freshwater wetlands to residential, commercial, and other developed land uses. These wetland habitats and other waters may be protected under Section 404 of the CWA. Therefore, buildout of the Proposed Project could

result in loss and degradation of federally protected wetlands. The impact is potentially significant and mitigation is identified (FEIR, pp. 4.4-49 and 4.4-50).

> Mitigation Measure 4.4-4a – The 2035 General Plan should be amended to include the following new implementation program (Implementation Program Biological Resources 3)
> If the project would result in ground disturbance on sites containing waterways or other aquatic habitats, the City will require project proponent/s to complete a delineation of waters of the United States according to U.S. Army Corps of Engineers' methods, and to submit the completed delineation to the U.S. Army Corps of Engineers for jurisdictional determination. If the project would result in fill of wetlands or other waters of the United States, the City will require project proponent/s to obtain a Section 404 Clean Water Act permit from the U.S. Army Corps of Engineers and water quality certification from the Regional Water Quality Control Board pursuant to Section 401 of the Clean Water Act. If the project involves work in areas containing waters disclaimed by the USACE, project applicants shall obtain a Waste Discharge Requirement permit from the Regional Water Quality Control Board pursuant to the Porter Cologne Act. Project applicants shall be required to obtain all needed permits prior to project implementation, to abide by the conditions of the permits, including all mitigation requirements, and to implement all requirements of the permits in the timeframes required therein.
>
> Mitigation Measure 4.4-4b – Implement Mitigation Measure 4.4-1a
>
> Mitigation Measure 4.4-4b – Implement Mitigation Measure 4.4-1b

With implementation of these changes, impacts would be reduced because it would preserve the majority of wetland and aquatic habitats (e.g., alkali sink and freshwater wetlands) within the Open Space land use designation and would require development projects to identify and avoid wetland habitats or provide compensation resulting in no net loss of habitat functions and values. Policies requiring protection of special-status species and their habitats also protect wetlands and drainages because these include special-status species such as vernal pool branchiopods, vernal pool plants, and giant garter snake that are associated with aquatic habitats (FEIR, p. 4.4-50).

Impact 4.4-7: Conflict with an Adopted Habitat Conservation Plan Natural Community Conservation Plan.

Finding: **Less than significant with mitigation** (FEIR, p. 4.4-57).

Explanation: The General Plan Land Use Diagram and 2035 General Plan policies and implementation programs have been designed to provide consistency with the proposed Yolo HCP/NCCP. The impact is potentially significant and mitigation is identified (FEIR, p. 4.4-57).

> Mitigation Measure 4.4-7a – Implement Mitigation Measure 4.4-1a
>
> Mitigation Measure 4.4-7b – Implement Mitigation Measure 4.4-1b
>
> Mitigation Measure 4.4-7c – Implement Mitigation Measure 4.4-2a

With implementation of these changes, impacts would be reduced because these provisions would ensure that growth projected under the Proposed Project would not conflict with the goals and objectives of the Yolo HCP/NCCP because it would preserve habitat identified for preservation under the current Draft

HCP/NCCP and would require project applicants to participate in the Plan, if adopted, to mitigate impacts on covered species and habitats consistent with the Yolo HCP/NCCP conservation strategy (FEIR, p. 4.4-57).

Climate Change, Greenhouse Gas Emissions, and Energy

Impact 4.5-1: Generation of Greenhouse Gas Emissions.

Finding: **Less than cumulatively considerable with mitigation** (FEIR, p. 4.5-41).

Explanation: Implementation of the Proposed Project would implement planned land uses that would involve short-term GHG emissions associated with construction and infrastructure improvements, along with long-term operational emissions. However, policies and reduction strategies within the 2035 General Plan and the 2035 CAP would ensure that the City achieves its share of AB 32, Executive Order B-30-15, SB 32, and Executive Order S-3-05 emissions reductions. There is a significant cumulative impact and mitigation is identified (FEIR, pp. 4.5-38 and 4.5-39).

Mitigation Measure 4.5-1a – The 2035 General Plan should be amended to include the following new implementation program (Implementation Program Greenhouse Gas Emissions 1)

a. The City will maintain a Climate Action Plan designed to achieve the reduction targets for land use-related emissions for the years 2020 and 2035 and put the City on a trajectory toward goals for longer-term years, such as 2050. The City's reduction targets may be revised over time, but will represent a rate of emissions that is efficient enough to provide for Woodland's share of AB 32, Executive Order B-30-15, SB 32,and Executive Order S-3-05 emissions reductions.

b. The Climate Action Plan will focus on GHG emission sectors over which the City could have influence – either through entitlement authority, public investments, incentives, or other feasible means. When making the comparison between Woodland's GHG efficiency and that required for the state as a whole, the City can remove from consideration GHG sources that are beyond local control.

c. The City will monitor relevant local, regional, State, and federal legislation and regulations related to GHG emissions, land use planning, and environmental review, and will make changes to the Climate Action Plan accordingly. Future regulations may have the effect of reducing GHG emissions associated with implementation of the Proposed Project. The effect of future regulations shall be taken into account in future revisions to the Climate Action Plan. New transportation modeling tools may become available that allow revisions to emissions estimates based on the City's policies related to land use, urban design, and transportation.

d. The City will revise the Climate Action Plan, as necessary, based on updated inventories and assessments of the effectiveness of reduction strategies no less than every 5 years. If, based on the City's future updated assessments, existing reduction strategies would not achieve the City's reduction targets, the City will make revisions to strategies or develop new strategies. The City will make revisions to its reduction targets, if necessary, to ensure that the target continues to demonstrate an appropriate share of the State's emission reduction goals for Woodland. The City anticipates that a Climate Action Plan update will be needed after new statewide measures are adopted to reduce GHG emissions, such as when the State updates the Air Resources Board Scoping Plan. The City will make revisions to the Climate Action Plan, if necessary, as new technology becomes available that would affect emissions in the Planning Area or the City's ability to forecast future emissions.

e. In maintaining the Climate Action Plan, during the CAP updates described above, the City will consider new or revised reduction strategies that may be necessary to achieve the City's reduction targets, while also promoting other goals of the City's General Plan. The City will identify additional plans, policies, projects, mitigation measures, and regulations that are necessary to reduce GHG emissions and achieve the City's reduction targets. The City will consider regulatory changes, infrastructure investment strategies, incentives, contributions to (or local use of) carbon offset programs, and other measures, as appropriate. The City shall consider financing programs for installation and use of renewable energy infrastructure in new and/or existing development, building codes to further increase energy efficiency in new buildings, incentive programs to assist existing property owners in making energy efficiency upgrades, travel demand management programs for new nonresidential projects, and other mechanisms that would reduce GHG emissions. The City will prioritize reduction strategies that offer co-benefits, such as reducing household or business transportation costs, reducing household and business utility bills, improving local air quality, reducing energy use, reducing traffic congestion, conserving water and other resources, moderating the heat island effect, preserving natural habitat, creating local jobs, among other benefits.

f. The City anticipates that State funding for GHG-efficient transportation systems and other local applications of the State's GHG reduction mandates will be important in meeting the State's overall GHG goals. Local governments will rely on state funding to improve existing buildings and provide more energy- and GHG-efficient sources of electricity. The City will monitor grant and other funding programs that could be used to implement different components of the Climate Action Plan.

Mitigation Measure 4.5-1b – Implementation of Mitigation Measure 4.3-2a

Mitigation Measure 4.5-1c – Implementation of Mitigation Measure 4.3-2b

As noted, the City developed a preliminary CAP that demonstrates a 15 percent reduction in emissions compared to 2005 levels by 2020. The 2005 baseline was estimated to be approximately 566,389 MT CO2e. Statewide measures would reduce emissions in 2020 to approximately 541,657 MT CO2e. Local reductions in the preliminary CAP demonstrate another 60,226 MT CO2e of reductions, resulting in a 2020 estimate of approximately 481,431 MT CO2e, or a 15 percent reduction from 2005 levels. Please see the 2035 CAP, released under a separate cover, for details. Pursuant to AB 32, ARB adopted the Climate Change Scoping Plan (Scoping Plan) in December 2008, outlining measures to meet the 2020 GHG reduction target (i.e., achieve 1990 emissions levels by year 2020). To meet the target, California must reduce its GHG emissions by 15 percent from 2005 levels. The City's emission reductions of 15 percent from 2005 levels are consistent with the mandate established for the State government under AB 32.

The Proposed Project contains several policies that would promote mixed-use and infill development. Several policies would site residents, jobs, and retail amenities in proximity of each other to reduce the need for motor vehicle travel. The Proposed Project would encourage alternative modes of transportation. Many policies through various mechanisms would support development of pedestrian and bicycle facilities that would promote non-vehicular modes of travel. For the water and wastewater sector, policies have been developed to encourage minimizing water use and wastewater generation. Policies have also been developed to encourage methods to minimize solid waste generation and increase waste diversion systems. Policies have also been developed to encourage alternative transportation and transit that would reduce transportation-related air quality impacts. Policies require development to be consistent with the

City's 2035 CAP and that the City maintain and update its GHG inventory as new information becomes available. Policies commit the City to implementing a CAP, including targets for 2020 and 2035.

The 2035 CAP would achieve local annual reductions that, when combined with estimated future statewide reductions, will achieve an efficiency level of 2.25 MT CO2e per service population per year, which is consistent with what the State of California would need to achieve goals for the State government under AB 32, Executive Order B-30-15, SB 32, and Executive Order S-3-05. Achieving this level of GHG emissions efficiency in Woodland for the 2035 General Plan horizon year also demonstrates the City's progress toward longer-term reduction target years, such as 2050. This is because the efficiency based reduction target of 2.25 MT CO2e per service population per year is extrapolated between State's own goals for 2030 (Executive Order B-30-15 and SB 32) and 2050 (Executive Order S-3-05). Lastly, numerous policies would promote low impact development to reduce energy and water consumption, which would also indirectly reduce air pollutant emissions – both criteria air pollutants and GHG emissions – but are not specifically factored into the calculations on emission reductions. The Proposed Project policies would reduce GHG emissions from various sources (e.g., energy, water, solid waste, transportation). Implementation of these policies would result in an additional reduction in total annual GHG emissions.

The State has just initiated the effort to begin gathering public and stakeholder input regarding approaches that could achieve the nearer-term of the two post-2020 targets (the Executive Order B-30-15 and SB 32 goal for the State to reduce emissions 40 percent below 1990 levels by 2030).

According to ARB's 2030 Target Scoping Plan Concept Paper, Governor Brown has articulated some of the key concepts that will be explored further, including (ARB 2016):

- reducing today's petroleum use in cars and trucks by up to 50 percent;
- increasing from one-third to 50 percent our electricity derived from renewable sources;
- doubling the efficiency savings achieved at existing buildings and making heating fuels cleaner;
- reducing the release of methane, black carbon, and other short lived climate pollutants; and
- managing farm and rangelands, forests and wetlands so they can store carbon.

The 2030 target for the State government will require multiple efforts that achieve reductions from multiple sources, including existing efforts that are already underway, along with new programs. In order to achieve more ambitious emission reduction goals, the State will need to be flexible enough to accommodate innovation and change, provide incentives for voluntary efforts, and remove regulatory barriers (ARB 2016). A holistic perspective that continues California's efforts to link related policy priorities will be needed for post-2020 emission reduction goals. For example, the State will need to continue to connect infrastructure investments with GHG reduction goals for passenger vehicles, connect open space preservation objectives with sequestration potential, and connect economic development goals for both rural and urban communities with progress on environmental justice (ARB 2016). Although the State is just initiating its efforts on developing a strategy to achieve post-2020 goals, it appears that it will be important in defining this strategy to identify areas where there is synergy among multiple positive outcomes.

The next Scoping Plan will outline the actions necessary to achieve the 2030 goal and is expected to help contribute also to the more ambitious 2050 goal established in Executive Order S-3-05 for the State government. Without any information about how the next Scoping Plan will approach the 2030 goal, and without any information about how the State may approach a 2050 goal, it is not possible to determine whether GHG emissions in Woodland would mirror the State's efforts toward either of these milestones. However, the 2035 CAP and the 2035 General Plan commit the City to revisiting the emissions inventory

and CAP reduction strategies when new information is available and making appropriate changes. The General Plan includes several policies, as noted above, that address the major emission sources for Woodland: transportation and energy. Policies that promote mixed-use and infill development and locate residents in proximity of jobs, amenities, entertainment, and other destinations will help to reduce travel demand and the main source of local emissions. Policies throughout the Proposed Project encourage non-vehicular modes of transportation and support development of pedestrian and bicycle facilities. The Proposed Project policies would reduce GHG emissions from various sources (e.g., energy, water, solid waste, transportation). Implementation of these policies would result in an additional reduction in total annual GHG emissions. Policies in the 2035 General Plan, reduction strategies in the 2035 CAP, and mitigation identified in this section will reduce local GHG emissions and commit the City to adjust policies and reduction measures, as needed, when future information related to the State's efforts become available (FEIR, p. 4.5-41).

Impact 4.5-2: Conflict with an Applicable Plan, Policy, or Regulation Adopted for the Purpose of Reducing the Emissions of Greenhouse Gases.

Finding: **Less than significant with mitigation** (FEIR, p. 4.5-43).

Explanation: 2035 General Plan policies and implementation programs and the 2035 CAP ensure that GHG emissions within the Planning Area occur at a rate that is consistent with goals set for the State government to reduce GHG emissions. Projects that seek to use streamlining identified under SB 375 would need to determine consistency with SACOG's MTP/SCS. The impact is potentially significant and mitigation is identified (FEIR, p. 4.5-43).

> Mitigation Measure 4.5-2 – The 2035 General Plan should be amended to include the following new policy:
>
> Policy 7.F.12. MTP/SCS Consistency. For projects seeking to utilize available CEQA streamlining, determine project consistency with the MTP/SCS as a component of application review.

The methodology and purpose of the City's estimate of development capacity under the Proposed Project is different from the methodology and purpose of SACOG's forecast for the purposes of the MTP/SCS. The SACOG projections are market-based growth estimates that project the amount and location of likely growth in the region based on a variety of socio-economic factors that are updated every four years. The City's General Plan is a long range planning tool that seeks to create opportunities for growth and provide a range of land use options to encourage economic investment and promote other City policy objectives. Given these different purposes, it is reasonable to expect variations in the growth forecasts between the two. For development projects that seek to utilize the CEQA streamlining allowed under SB 375 and other related legislation, it will be necessary to demonstrate project-level consistency with the MTP/SCS. With the identified mitigation, the City's policy is clear that consistency with the MTP/SCS will be required in order to use streamlining that is related to the MTP/SCS (FEIR, p. 4.5-43).

Geology, Soils, Minerals Resources, and Paleontological Resources

Impact 4.7-3: Geologic Hazards Related to Unstable Soils, Expansive Soils, and Soil Unsuitable for Septic Systems.

Finding: **Less than significant with mitigation** (FEIR, pp. 4.7-32 and 4.7-33).

Explanation: Land use change under the Proposed Project would result in the placement of buildings and infrastructure in areas of unstable soils, soils with high a shrink-swell potential, and in locations where the soil is not appropriate for use with septic systems. The impact is potentially significant and mitigation is identified (FEIR, p. 4.7-32).

> Mitigation Measure 4.7-3a – The 2035 General Plan should be amended to include the following new implementation program (Implementation Program Soils 1)
> Where soils are proposed for use as leach fields associated with wastewater treatment, the City shall require a site-specific evaluation by a licensed geotechnical engineer regarding the soil suitability, including a perc test, as appropriate.
> All septic systems or other forms of on-site wastewater treatment and disposal facilities shall be designed by a licensed geotechnical or civil engineer. On-site wastewater treatment systems shall be designed to meet the following parameters:
> - provide available effective absorptive area in both primary and reserve disposal fields;
> - provide appropriate separation between the disposal field bottom and groundwater or a restrictive soil layer;
> - factor the ground slope in both the primary and reserve disposal field areas;
> - factor the influent wastewater strength and quantity in wastewater system design;
> - accommodate requirements for setbacks from wells, surface waters, and property boundaries; and
> - provide treatment of wastewater such that it does not adversely affect water quality or endanger public health.

With implementation of these changes, impacts would be reduced since the City's requirement for site-specific geotechnical reports will identify specific methods to reduce hazards from construction in unstable and expansive soils, and because on-site wastewater treatment systems would be appropriately designed and engineered (FEIR, pp. 4.7-32 and 4.7-33).

Impact 4.7-4: Loss or Damage to Paleontological Resources during Earth-Moving Activities.

Finding: **Less than significant with mitigation** (FEIR, p. 4.7-35).

Explanation: Paleontological resources could occur in the Planning Area and construction activities under the Proposed Project could result in damage to, or destruction of unknown subsurface paleontological resources. Paleontological resources could occur in Pleistocene-age sediments that underlie portions of the Planning Area. Construction activities in these areas could result in damage to, or destruction of unknown subsurface paleontological resources. The impact is potentially significant and mitigation is identified (FEIR, pp. 4.7-34 and 4.7-35).

> Mitigation Measure 4.7-4 – The 2035 General Plan should be amended to include the following new implementation program (Implementation Program Paleontological Resources 1)
> - Prior to the start of earthmoving activities that would disturb one (1) acre of land or more within the Riverbank or Modesto Formations, the project applicant shall inform all construction personnel involved with earthmoving activities regarding the possibility of encountering fossils, the appearance and types of fossils likely to be seen during construction, and proper notification procedures should fossils be encountered.
> - If paleontological resources are discovered during earthmoving activities, the construction crew shall immediately cease work in the vicinity of the find and notify the City of Woodland Community Development Department.

- The project applicant shall retain a qualified paleontologist to evaluate the resource and prepare a recovery plan. The recovery plan may include, but is not limited to, a field survey, construction monitoring, sampling and data recovery procedures, museum curation for any specimen recovered, and a report of findings. Recommendations in the recovery plan that are determined by the City to be necessary and feasible shall be implemented before construction activities can resume at the site where the paleontological resources were discovered.

Mitigation Measure 4.7-4 would create a new implementation program that contains additional resource disturbance prevention activities and a cease-work requirement upon paleontological resource discovery. With implementation of these changes, impacts would be reduced because earth-moving activities in paleontologically sensitive rock formations would be subject to requirements consisting of construction worker personnel education, halting of work in the vicinity of any fossil specimen(s) uncovered, and preparation of a recovery plan for said specimen(s) (FEIR, p. 4.7-35).

Hydrology, Flooding, and Water Quality

Impact 4.9-1: Violation of Water Quality Standards.

Finding: **Less than significant with mitigation** (FEIR, p. 4.9-39).

Explanation: Implementation of the Proposed Project would convert large areas of undeveloped land to residential, commercial, industrial, and mix-uses, as well as intensify land uses as infill in existing downtown and major corridor areas, resulting in impacts related to additional discharges of pollutants to receiving water bodies. Such pollutants would result in adverse changes to the water quality of local water bodies. However, with adoption and implementation of the proposed policies in the Proposed Project, combined with current land use, stormwater, grading, and erosion control regulations, this impact is potentially significant and mitigation is identified (FEIR, pp. 4.9-38 and 4.9-39).

Mitigation Measure 4.9-1 – Policy 5.1.4 should be amended to read:

Policy 5.I.4. Low Impact Development (LID). Require new development and redevelopment projects to incorporate site design and low impact development runoff requirements, in accordance with the Municipal Code to reduce runoff rates, filter out pollutants, and facilitate groundwater infiltration. Such features may include, but are not limited to:

- Canopy trees or shrubs to absorb rainwater;
- Grading that lengthens flow paths over permeable surfaces and increases runoff travel time to reduce the peak hour flow rate;
- Partially removing curbs and gutters from parking areas where appropriate to allow stormwater sheet flow into vegetated areas;
- Use of permeable paving in parking lots and other areas characterized by significant impervious surfaces;
- On-site stormwater detention, use of bioswales and bioretention basins to facilitate infiltration; and
- Integrated or subsurface water retention facilities to capture rainwater for use in landscape irrigation and other non-potable uses.

Implementation of the this mitigation measure in addition to policies outlined in the Proposed Project would serve to minimize long-term water quality impacts associated with increased urbanization. The goal of these policies as they relate to wastewater collection, treatment, disposal, and reuse is to ensure that

adequate facilities are provided in a timely fashion to accommodate current and future needs, and thereby manage wastewater to protect receiving water quality.

Inadequate stormwater drainage infrastructure can lead to localized flooding, as well as erosion and sedimentation. Adequate stormwater conveyance capacity and pre-treatment through the use of LID technologies and BMPs is critical since stormwater in the City of Woodland is discharged untreated through a series of sloughs that eventually connect to Yolo Bypass.

The goal of the General Plan policies as they relate to stormwater management is to provide flood protection, enhance water quality, prevent infrastructure deterioration, and facilitate compliance with State and federal laws. Successful implementation of the 2035 General Plan policies would avoid, minimize, or compensate for potential water quality impacts by requiring projects to reduce pollution and runoff through implementation of LID technologies, BMPs, pretreatment, and upgrades to stormwater and wastewater treatment capacity, as needed.

Policies related to the safe handling and disposal of hazardous materials would also protect water quality through the proper handling, use, and disposal of hazardous materials, as well as emergency response planning to minimize potential water quality impacts from accidental spills. Together, these polices assist the City in complying with federal and State regulations, such as the Clean Water Act, EPA's water quality criteria, and the Safe Drinking Water Act.

Adoption and implementation of the proposed policies and compliance with existing stormwater, grading, and erosion control regulations would reduce this potential impact (FEIR, p. 4.9-39).

Impact 4.9-2: Construction-Related Water Quality Impacts.

Finding: **Less than significant with mitigation** (FEIR, p. 4.9-43).

Explanation: Construction and grading activities during development consistent with the Proposed Project could result in excess runoff, soil erosion, and stormwater discharges of suspended solids and increased turbidity. Such activities could mobilize other pollutants from project construction sites as contaminated runoff to on-site and ultimately off-site drainage channels. Many construction-related wastes have the potential to degrade existing water quality. Construction activities that are implemented without mitigation could violate water quality standards or cause direct harm to aquatic organisms. However, with implementation of existing regulations and water quality policies contained in the 2035 General Plan, the impact is potentially significant and mitigation is identified (FEIR, p. 4.9-43).

Mitigation Measure 4.9-2 – Implement Mitigation Measure 4.9-1

Successful implementation of the General Plan policies would avoid and minimize water quality impacts during construction because they would require implementation of LID technologies and BMPs to protect receiving water quality; appropriate hazardous materials handling, storage, and disposal; and prohibit grading activities in the rainy season when erosion potential is at its highest. Compliance with General Plan policies and existing regulations, including acquisition of appropriate regulatory permits and preparation and implementation of a SWPPP and BMPs, would reduce potential impacts related to erosion and water quality during construction (FEIR, p. 4.9-43).

Impact 4.9-3: On-Site and Downstream Erosion and Sedimentation and Alteration of Drainage Patterns.

Finding: **Less than significant with mitigation** (FEIR, p. 4.9-47).

Explanation: Development and land use change consistent with the 2035 General Plan would increase the amount of impervious surfaces, thereby increasing surface runoff. This increase in surface runoff would result in an increase in both the total volume and the peak discharge rate of stormwater runoff, and therefore could result in greater potential for erosion, sedimentation, hydromodification, and on- and off-site flooding. However, with adoption and implementation of the proposed policies and actions in the 2035 General Plan, combined with current grading, erosion, and flood control regulations, this impact is considered significant and mitigation is identified (FEIR, p. 4.9-47).

Mitigation Measure 4.9-3 – Implement Mitigation Measure 4.4-1

General Plan policies require implementation of LID technologies, BMPs, and hydromodification management techniques to protect receiving water quality, mitigate excessive runoff, and mimic the runoff of a natural environment. Additional policies would serve to maintain and improve the City's storm drainage system. Prohibiting grading activities in the rainy season would also serve to reduce erosion potential. Finally, policies addressing open space and sensitive habitat conservation would restrict incompatible land uses and development from areas including riparian corridors, drainages, and floodplains. Adoption and implementation of the policies in the 2035 General Plan, combined with enforcement of the existing grading, erosion, and flood control regulations would reduce this potential impact (FEIR, p. 4.9-47).

Public Services and Recreation

Impact 4.12-3: Impacts Related to School Services.

Finding: Less than significant with mitigation (FEIR, p. 4.12-39).

Explanation: Implementation of the Proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 time or other performance objectives for schools. The impact is considered potentially significant and mitigation is identified (FEIR, p. 4.12-39).

Funding for new school construction is provided through State and local revenue sources. Senate Bill (SB) 50 (Chapter 407, Statutes of 1998) governs the amount of fees that can be levied against new development. Payment of fees authorized by the statute is deemed "full and complete mitigation" (FEIR, p. 4.12-39).

Impact 4.12-5: Impacts Associated with Other Public Facilities.

Finding: **Less than significant with mitigation** (FEIR, p. 4.12-46).

Explanation: Implementation of the Proposed Project could result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 time or other performance objectives for

other public facilities. The impact is considered potentially significant and mitigation is identified (FEIR, p. 4.12-46).

> Mitigation Measure 4.12-5a – The 2035 General Plan should be modified to include the following new implementation program (Implementation Program Public Services 1):
>
> Adopt a Municipal Facilities Master Plan that studies and identifies future space needs for city government offices, library facilities, and any other municipal service facilities not addressed in the Parks, Recreation, and Community Services Master Plan, and establishes space standards and ratios, as appropriate.

The 2035 General Plan is an expression of the City of Woodland's vision for future physical growth within the Planning Area and consists of a series of policies and implementation programs necessary for achieving that vision. The 2035 General Plan does not establish service standards for public facilities and therefore is in conflict with the existing service standards for public facilities in the existing 2002 General Plan. The mitigation measure listed above would ensure that future space needs are identified and standards are established for public facilities to support the City as it continues to grow, even though the standards are not included in the 2035 General Plan itself. However, before this Master Plan is prepared, it cannot be known whether the standards within it will be equal to or better than those included in the 2002 General Plan. The only other mitigation would be to not adopt the 2035 General Plan, which is not a feasible action that would still achieve the objectives of the Proposed Project (FEIR, p. 4.12-46).

Transportation and Circulation

Impact 4.13-1: Conflict with an Applicable Plan, Ordinance or Policy Establishing Measures of Effectiveness for the Performance of the Circulation System by Resulting in Unacceptable Levels of Service on City of Woodland Roadways.

Finding: **Less than significant with mitigation** (FEIR, p. 4.13-20).

Explanation: Implementation of the Proposed Project could cause unacceptable LOS conditions on some roadway segments. The impact is considered potentially significant and mitigation is identified (FEIR, pp. 4.13-17 through 4.13-19).

> Mitigation Measure 4.13-1a – The 2035 General Plan should be amended to include the following modification of the Circulation Diagram:
> Include E. Gum Avenue from Bourn Drive to Pioneer Avenue as a 2-lane minor arterial.
>
> This action would result in potential physical changes to the roadway under this classification that may include access control and minor turn-lane widening at intersections. Under this classification, the LOS would be improved to LOS C and the impact would be less than significant with mitigation.
> OR
> Mitigation Measure 4.13-1b – The 2035 General Plan should be amended to include the following modified policy:
>
> Policy 3.A.1 Vehicle Level of Service (LOS) Standard. Strive to develop and manage the roadway system to maintain LOS D or better as defined in the latest edition of the Highway Capacity Manual (Transportation Research Board) during weekday AM and PM peak hour conditions with the following exceptions described below and mapped on Figure 3-1.

A. LOS C - Kentucky Ave from East Street to County Road 98. This level of service is required to accommodate the mix of commercial/industrial truck traffic with residential driveways.

B. LOS E – Freeway ramp terminal intersections and E. Gum Avenue from Bourn Drive to Pioneer Avenue.

C. LOS F – LOS F is allowed for the following roadway segments and intersections where the City finds that the improvements or other measures required to achieve the LOS standard are unacceptable because of their impact on other community values.

- Main Street from 6th Street to Cleveland St.
- Maxwell Ave from Farnham Avenue to County Road 102

This action would recognize that potential physical changes to this section E. Gum Avenue to increase its capacity are not desirable due to access or right-of-way impacts on adjacent properties or the environment. The impact would be less than significant with mitigation.

AND

Mitigation Measure 4.13-1c – The 2035 General Plan should be amended to include the following modified policy and new implementation program:

Policy 3.A.4 Reduce Vehicle Miles Traveled (VMT). Require new development projects to achieve a 10 percent reduction in VMT per capita or VMT per service population compared to the general plan 2035 VMT performance, or a 10 percent reduction compared to baseline conditions for similar land uses Apply a VMT transportation performance metric threshold of 30 VMT per capita when measuring transportation impacts for subsequent projects and making General Plan consistency findings. Reducing peak period VMT in particular is desirable due to the added benefit of minimizing severe congestion and reducing emissions. Use of VMT reduction strategies such as those in Chart 6-2 below taken from Quantifying Greenhouse Gas Mitigation Measures, CAPCOA, 2010 or similar professional research documents is encouraged. [See Section 4.13 of this EIR, "Transportation and Circulation"] taken from Quantifying Greenhouse Gas Mitigation Measures, CAPCOA, 2010 or similar professional research documents is encouraged.

Implementation Program 3.8. After final adoption of SB 743 CEQA Guidelines changes and any associated technical advisory recommendations by the State of California, the City will assess the VMT reduction goal contained in Policy 3.A.4. The assessment should consider substantial evidence presented by the State in recommending any alternative VMT reduction goals as CEQA thresholds plus the community values expressed by the goals and policies. The City should strive to set thresholds consistent with the City's envisioned future while striving to achieve reasonable reductions in vehicle travel that produce air pollution and greenhouse gases.

This mitigation would recognize that potential physical changes to this section East Gum Avenue to increase its capacity are not desirable due to access or right-of-way impacts on adjacent properties or the environment. The mitigation would also strengthen the policy's influence on reducing vehicle travel associated with new development projects helping to reduce p.m. peak hour traffic volumes (FEIR, p. 4.13-20).

Impact 4.13-2: Conflict with an Applicable Plan, Ordinance or Policy Establishing Measures of Effectiveness for the Performance of the Circulation System by Resulting in Unacceptable Levels of Service on Caltrans Roadways.

Finding: **Less than significant with mitigation** (FEIR, p. 4.13-21).

Explanation: Implementation of the Proposed Project would exacerbate unacceptable No Project LOS D conditions on the I-5 Mainline east of County Road 102 under 2035 conditions. The impact is considered potentially significant and mitigation is identified (FEIR, p. 4.13-21).

Mitigation Measure 4.13-2 – Implement Mitigation Measure 4.13-1c.

This mitigation would strengthen the policy's influence on reducing vehicle travel associated with new development projects helping to reduce p.m. peak hour traffic volumes (FEIR, p. 4.13-21).

Impact 4.13-3: Conflict with an Applicable Congestion Management Program by Resulting in Unacceptable Levels of Service on CMP Network Roadways.

Finding: **Less than significant with mitigation** (FEIR, p. 4.13-23).

Explanation: Implementation of the Proposed Project would cause unacceptable LOS conditions on one CMP roadway segment. The impact is considered potentially significant and mitigation is identified (FEIR, p. 4.13-22).

Mitigation Measure 4.13-3a – Implement Mitigation Measure 4.13-1c.

Mitigation Measure 4.13-3b – The 2035 General Plan should be amended to include the following modification of the circulation diagram.

Circulation Diagram: Include County Road 102 from E. Gibson Road to Farmers Central Road as a 4-lane principal arterial.

This mitigation would strengthen the policy's influence on reducing vehicle travel associated with new development projects. This mitigation would result in a physical capacity expansion to the roadway under this classification that would improve the LOS to C or better. A potential indirect effect of Mitigation Measure 4.13-3b is an increase in VMT due to the increase in roadway capacity. This effect is captured in the VMT forecasts contained in Table 4.13-3 for buildout where this segment of County Road 102 is planned as a four-lane principal arterial (FEIR, p. 4.13-23).

3. Findings Regarding Environmental Impacts Not Fully Mitigated to a Level of Less than Significant

The City Council hereby finds that the following impacts from the Proposed Project cannot be mitigated to a less than significant level with any feasible mitigation, and a Statement of Overriding Considerations is therefore required.

Aesthetics and Visual Resources

Impact 4.1-3: Substantially Degrade the Existing Visual Character or Quality of the Site and its Surroundings.

Finding: The Proposed Project facilitates new development that will change the existing visual character of the Planning Area. However, impacts on visual character and quality of the site are subjective and variable between different individuals.

Policies from the 2035 General Plan provide guidance for development and conservation that relate to aesthetics and visual resources. Implementation Program 2.13 requires the City to update the Community Design Standards to identify the City's expectations for planning, designing, and reviewing development proposals, consistent with the balance of the 2035 General Plan. Implementation Program 2.23 requires the City to develop historic design guidelines that provide context sensitivity in historic districts and neighborhoods. Despite proposed policies and implementation programs, implementation of the 2035 General Plan is still expected to result in development in infill and new growth areas that will inherently change Woodland's visual character. The City has presented all feasible mitigation in the form of policies and programs in the Proposed Project. There is no additional feasible mitigation available (FEIR, p. 4.1-31).

The impact would remain **significant and unavoidable** (FEIR, p. 4.1-31). As described in Section VIII, specific social, economic, and environmental benefits of the Project outweigh the identified potential unavoidable significant impacts.

Impact 4.1-4: Create a New Source of Substantial Light or Glare Which Would Adversely Affect Day or Nighttime Views in the Area.

Finding: Implementation of the Proposed Project would create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. The impact is considered significant. Mitigation is included (FEIR, p. 4.1-33).

> Mitigation Measure 4.1-4 – The 2035 General Plan should be amended to include the following new policies:
>
> Policy 2.F.4 Light Pollution. Control artificial lighting to avoid spill-over lighting and preserve the night sky.
>
> Policy 2.F.5 Glare. Control artificial lighting to prevent glare.

The mitigation measures limit the impact from light and glare, but it is not feasible to mitigate the impacts completely without prohibiting the use of light in new development.

The impact would remain **significant and unavoidable** (FEIR, p. 4.1-33). As described in Section VIII, specific social, economic, and environmental benefits of the Project outweigh the identified potential unavoidable significant impacts.

Agriculture and Forestry Resources

Impact 4.2-1: Convert Prime Farmland, Unique Farmland, or 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 Use.

Finding: Implementation of the Proposed Project would convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. Mitigation is included (FEIR, p. 4.2-35).

> Mitigation Measure 4.2-1 – The 2035 General Plan should be amended to include the following modified policy:
>
> Policy 2.A.3 Agricultural Mitigation. For impacts to agricultural land within the ULL, require one acre to be permanently conserved for every acre converted to urban development (1:1 ratio). The farmland being conserved must be of the same Farmland Mapping and Monitoring Program type (Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland

of Local Importance) as the farmland that is being converted, or of a type of higher quality, and the conserved farmland should be located outside of, but as close to the Woodland Urban Limit Line as possible. For projects proposing to convert agricultural land to urban use, require soils analysis to determine farmland classification for purposes of determining appropriate mitigation as part of environmental review conducted for the project.

Implementation of the 2035 General Plan and 2035 CAP policies, as well as the Yolo County Agricultural Conservation Policy, will reduce the impacts on farmland conversion. The ULL was adopted for the purpose of permanently circumscribing development and preserving surrounding agricultural lands. This action of the voters identified those lands intended to be converted to urban uses over time in the form of an urban limit line and permanently protected lands outside of that boundary. Ballot initiatives are not subject to environmental impact review under CEQA and therefore the 2006 action by the voters did not include an assessment of the impacts resulting from the urban limit line. As enacted by the voters, Policy 2.A.1 prohibits City public services and facilities beyond Woodland's ULL. In addition, Policy 2.A.3 requires agricultural mitigation of farmland within the ULL at a rate of one acre of permanently conserved farmland for every acre converted to urban development or non-agricultural uses. The policy specifies conservation of the same type of farmland, therefore loss of Prime Farmland can only be mitigated with the conservation of Farmland of equal or higher quality. Goal 7.6 prioritizes the preservation of agricultural land, and Policy 7.C.1 requires the City to minimize the amount of annexed land.

In addition, several policies prioritize infill and compact development. The focus of the Proposed Project on infill and compact development in strategic new growth areas within the ULL aims to minimize the magnitude of farmland conversion and to help protect large tracts of farmland in agricultural areas.

Actions under Objective 2 Strategy E-6 and Objective 2 Strategy UF-5 in the 2035 CAP require the City to promote the installation of solar systems on existing development, rather than on agricultural land or open space. Additional policies require the maintenance of the ULL and support for legislative efforts that incentivize agricultural land preservation.

Mitigation Measure 4.2-1 ensures that for every acre of a certain type of farmland that is converted as a result of the Proposed Project, an acre of that same type (or better) of farmland will be conserved. However, there would still be a net loss of farmland that cannot be completely mitigated (FEIR, pp. 4.2-35 and 4.2-36). Thus, the impact is significant and unavoidable.

The impact would remain **significant and unavoidable** (FEIR, pp. 4.2-35 and 4.2-36). As described in Section VIII, specific social, economic, and environmental benefits of the Project outweigh the identified potential unavoidable significant impacts.

Impact 4.2-3: Involve Other Changes in the Existing Environment that, Due to Their Location or Nature, Could Result in Conversion of Farmland, to Non-Agricultural Use.

Finding: Policies in the 2035 General Plan emphasize the importance of agriculture to Woodland and support the viability of farming operations; however, implementation of the Proposed Project would result in the conversion of farmland to non-agricultural use. Mitigation is included (FEIR, p. 4.2-41).

Mitigation Measure 4.2-3 – The 2035 General Plan should be amended to include the following new policy:

Policy 7.C.5 Agricultural Buffer. Require new development that occurs at the edge of the ULL to be set back a minimum of 150 feet from adjacent agricultural land where possible.

Equivalent means of providing agricultural buffers may be considered by the Planning Commission on a case by case basis for parcels whose dimensions would preclude or severely limit development potential with the required buffer size. The buffer shall be landscaped and may include public right of way.

In addition to the policies that lessen direct impacts on farmland discussed in Impact 4.2-1, the Proposed Project includes policies and goals to support agriculture in Woodland and minimize conflicts between urban and agricultural uses. 2035 General Plan Policy 7.C.4 requires the City to ensure that urban development within the ULL does not affect the economic viability of adjacent farms outside of the ULL. 2035 General Plan Policies 2.D.2, 6.C.1, and 4.G.2 help strengthen specific segments of the agricultural industry, similar to the 2035 CAP policy listed above. Policy 4.C.9 explicitly supports the continuation and development of the agricultural industry in Woodland, and Policy 8.G.10 requires the City's support for both the City's and the County's right to farm ordinances. Policy 7.C.2 helps protect existing agriculture within the ULL, and Policy 7.C.3 requires Woodland to support Yolo County's agricultural conservation efforts.

Although policies in the Proposed Project will reduce the impact that development and other changes to the existing environment would have on existing agricultural uses and support the continued viability of the agricultural industry in Woodland, it cannot be guaranteed that farmland would not be indirectly impacted by development envisioned in the Plan. With the addition of Mitigation Measure 4.2-3, the City has presented all feasible mitigation in the form of policies and programs in the Proposed Project. There is no additional feasible mitigation available (FEIR, p. 4.2-41).

The impact would remain **significant and unavoidable** (FEIR, p. 4.2-41). As described in Section VIII, specific social, economic, and environmental benefits of the Project outweigh the identified potential unavoidable significant impacts.

Air Quality

Impact 4.3-1: Generation of Short-Term Construction-Related Emissions of Criteria Air Pollutants and Precursors.

Finding: Emissions of criteria air pollutants and precursors could exceed an ambient air quality standard or contribute substantially to an existing or predicted air quality exceedance. The level of construction emissions could conflict with or obstruct implementation of the applicable air quality plan. YSAQMD recommends that lead agencies incorporate construction mitigation measures, and the Proposed Project has policies that would reduce this impact. However, given the scale of the Proposed Project, the City cannot determine that potential construction impacts would be below relevant significance thresholds throughout the planning horizon. The impact is considered significant.
Mitigation is included (FEIR, pp. 4.3-24 and 4.3-25).

Mitigation Measure 4.3-1a – The 2035 General Plan should be amended to include the following new implementation program (Implementation Program Air Quality 1):

New developments that could generate a potentially significant short-term air quality impact shall incorporate feasible construction mitigation strategies, including those listed below, those included in an updated set of mitigation recommendations prepared by the Yolo-Solano Air Quality Management District, or those determined by the City to be as effective:

a. Water all active construction areas at least twice daily.
b. Haul trucks shall maintain at least two feet of freeboard.

c. Cover all trucks hauling soil, sand, and other loose materials.

d. Apply non-toxic binders (e.g., latex acrylic copolymer) to exposed areas after cut-and-fill operations and hydroseed area.

e. Apply chemical soil stabilizers on inactive construction areas (disturbed lands within construction projects that are unused for at least four consecutive days).

f. Plant tree windbreaks on the windward perimeter of construction projects if adjacent to open land.

g. Plant vegetative ground cover in disturbed areas as soon as possible.

h. Cover inactive storage piles.

i. Sweep streets if visible soil material is carried out from the construction site.

j. Treat accesses to a distance of 100 feet from the paved road with a 6 to 12 inch layer of wood chips or mulch.

k. Treat accesses to a distance of 100 feet from the paved road with a 6-inch layer of gravel.

l. Limit all idling of vehicles and equipment that use gasoline or diesel fuel to five minutes maximum.

m. Use alternative power source, such as electricity, for construction equipment or use reformulated and emulsified fuels, incorporate catalyst and filtration technologies, and generally modernize the equipment fleet with cleaner and newer engines.

Mitigation Measure 4.3-1b – Policy 7.F.2. will be amended to read:

Policy 7.F.2 Best Management Practices. Require all projects to implement Best Management Practices (BMPs) for reducing air pollutant emissions associated with the construction and operation of development projects as a standard City condition of approval.

The above policy and mitigation measures would reduce construction-related impacts. However, because the District estimates that these measures have a range of effectiveness that can be well below 100 percent, construction-related emissions of criteria air pollutants and precursors could still exceed significance thresholds. Such emissions could exceed or contribute substantially to an existing or projected air quality violation and/or expose sensitive receptors to substantial pollutant concentrations. In addition, these emissions could conflict with or obstruct implementation of the applicable air quality plan. There are no additional feasible mitigation measures available to address this significant impact (FEIR, p. 4.3-25).

The impact would remain **significant and unavoidable** (FEIR, p. 4.3-25). As described in Section VIII, specific social, economic, and environmental benefits of the Project outweigh the identified potential unavoidable significant impacts.

Impact 4.3-2: Generation of Long-Term Operational Emissions of Criteria Air Pollutants and Precursors.

Finding: Long-term operational emissions would be generated from day-to-day activities associated with residential and non-residential land uses under the Proposed Project. Operational emissions associated with the Proposed Project would exceed applicable YSAQMD thresholds. The level of operational emissions could conflict with or obstruct implementation of the applicable air quality plan. Proposed Project policies would reduce potentially significant impacts, but not to a level that would be below relevant thresholds. The impact is considered significant. Mitigation is included (FEIR, p. 4.3-32).

Mitigation Measure 4.3-2 – Implement Mitigation Measure 4.3-1b.

The Proposed Project contains several policies that would promote mixed-use and infill development. Policies have been developed to site residents, jobs, and retail amenities in proximity of each other to reduce the need for motor vehicle travel. The Proposed Project would encourage modes of transportation that can reduce or eliminate air pollutant emissions. Since transportation is a major source of criteria air pollutants, this is important for reducing the operational impacts of the Proposed Project. Policies would support development of pedestrian and bicycle facilities that would promote non-vehicular modes of travel. In order to eliminate or minimize transportation-related emissions, policies have also been designed to encourage pedestrian, bicycle, and transit access and mobility that would reduce transportation-related air quality impacts. In addition, the 2035 CAP's actions related to energy, transportation and land use, water and waste, and municipal operations would not only reduce greenhouse gas emissions, but also criteria air pollutants.

General Plan policies would reduce long-term operational air quality impacts. However, because the precise effectiveness of these measures cannot be determined at the time of this analysis, it is likely that operational emissions of criteria air pollutants and precursors could still exceed significance thresholds. Such emissions could exceed or contribute substantially to an existing or projected air quality violation and/or expose sensitive receptors to substantial pollutant concentrations. In addition, these emissions could conflict with or obstruct implementation of the applicable air quality plan. There are no additional feasible mitigation measures available to address this significant impact (FEIR, p. 4.3-33).

The impact would remain **significant and unavoidable** (FEIR, p. 4.3-33). As described in Section VIII, specific social, economic, and environmental benefits of the Project outweigh the identified potential unavoidable significant impacts.

Impact 4.3-3: Expose Sensitive Receptors to Substantial Pollutant Concentrations (Stationary).

Finding: Project-related vehicle trips would contribute vehicles to local intersections that could cause a CO hotspot (i.e., exceedance of the CO ambient air quality standard). However, it is not anticipated that the Proposed Project's land uses would contribute substantial vehicle volumes to existing or future intersections that could cause a CO hotspot. During construction and operation of the Proposed Project, localized air quality emissions would be generated that could affect existing and proposed sensitive receptors. Construction activities would generate diesel particulate matter (diesel PM) emissions that could affect existing and proposed sensitive receptors. Existing regulations and proposed policies and implementation programs would reduce potential exposure to substantial pollutant concentrations. The impact is considered significant. Mitigation is included (FEIR, pp. 4.3-43 and 4.3-44).

Mitigation Measure 4.3-3a – Policy 7.F.3 should be amended to read:

Policy 7.F.3. Protect Sensitive Receptors. For the purposes of environmental review of potential toxic air contaminant impacts, consider residentially designated land uses, hospitals and other medical facilities, and residential care facilities, schools, day care centers, playgrounds to be "sensitive receptors." Discourage the location of new sensitive receptor uses within 500 feet of a limited access state highway (SR 113 and 1-5). Implement applicable buffer distances recommended by the California Air Resources Board between sensitive uses and sources of substantial pollutant concentrations.

Mitigation Measure 4.3-3b – Implement Mitigation Measure 4.3-1b.

Mitigation Measure 4.3-3c – The 2035 General Plan should be amended to include the following new implementation program (Implementation Program Air Quality 2)

a. New development shall be required to demonstrate adherence with applicable YSAQMD-recommended health risk thresholds involving sensitive receptors, uses that involve substantial truck trips, and large gas stations, as defined by the applicable regulations. "Substantial truck trips" is defined as more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units (TRUs) per day, or TRU unit operations that exceed 300 hours per week. A "large gas station" is one that would be anticipated to accommodate a throughput of 3.6 million gallons per year or greater.

b. Proposed uses that include sensitive receptors may demonstrate compliance with this implementation program by providing a minimum 1,000-foot buffer from existing uses that involve substantial truck trips and a minimum 50-foot buffer from existing large gas stations.

c. Proposed uses that involve substantial truck trips may demonstrate compliance with this implementation program by providing a minimum 1,000-foot buffer from properties where the City's land use designation would allow sensitive receptors.

d. Proposed large gas stations may demonstrate compliance with this implementation program by providing a minimum 300-foot buffer, while typical gas dispensing facilities would provide a minimum 50-foot buffer from existing sensitive receptors and from properties where the City's land use designation would allow sensitive receptors.

e. Avoid siting new sensitive receptors within 500 feet of the edge of the closest travel lane of a freeway, urban roads with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day.

f. Avoid siting new sensitive land uses within 300 feet of any existing dry cleaning operation.

g. As an alternative to these buffer distances, proposed sensitive receptors, uses that involve substantial truck trips, and large gas stations may provide a site-specific health risk assessment, using methods consistent with applicable guidance from the Office of Environmental Health Hazard Assessment, with mitigation, if necessary, to demonstrate compliance with applicable YSAQMD-recommended health risk thresholds. When health risk impacts exceed YSAQMD-recommended thresholds, feasible on-site mitigation measures to reduce TAC exposure shall be implemented to mitigate health risk impacts below YSAQMD thresholds. On-site measures could include, but are not limited to providing enhanced filtration systems (e.g., MERV 13 or greater) for near-by sensitive receptor buildings, changes to the TAC emission source's operation, and positioning of exhaust and intake for ventilation systems to minimize exposure among others.

Mitigation Measure 4.3-3d – The 2035 General Plan should be amended to include the following new implementation program (Implementation Program Air Quality 3)

a. New development that would require the use of diesel-fueled construction equipment within 300 feet of an existing sensitive receptor use an equipment mix, incorporate buffering, schedule construction activities, or use other strategies to reduce potential health risk consistent with guidance from the Yolo-Solano Air Quality Management District.

b. Alternatively, a project applicant may prepare a site-specific estimate of diesel PM emissions associated with total construction activities and evaluate for health risk impact on existing sensitive receptors in order to demonstrate that applicable YSAQMD-recommended thresholds for toxic air contaminants would not be exceeded or that applicable thresholds would not be exceeded with the application of alternative mitigation techniques approved by the City.

The Proposed Project contains policies to reduce emissions associated with both construction and operational activities. The Proposed Project includes Policy 7.F.3 that would discourage development in locations that would conflict with the buffer recommendations in the ARB Air Quality and Land Use

Handbook. Mitigation Measures 4.3-3c and 4.3-3d provide specific guidance tied to performance standards that have been developed to protect the public health. The buffer distances incorporated into Mitigation Measure 4.3-3c are consistent with guidance from ARB. Implementation Program Air Quality 3 includes as an option to use an equipment mix, including the use of Tier 4 engine emission standards, which have been shown to reduce PM emissions by more than 90 percent from current levels or site-specific analysis and mitigation with clear performance outcomes tied to YSAQMD-recommended thresholds.

However, the potential for sensitive receptors to be exposed to substantial pollutant concentrations from stationary sources remains significant, even with the Proposed Project's policies and mitigation measures described above. There is not additional feasible mitigation. The impact related to stationary sources of TACs is significant and unavoidable (FEIR, p. 4.3-45).

The impact would remain **significant and unavoidable** (FEIR, p. 4.3-45). As described in Section VIII, specific social, economic, and environmental benefits of the Project outweigh the identified potential unavoidable significant impacts.

Cultural Resources

Impact 4.6-1: Cause a Substantial Adverse Change in the Significance of Archaeological or Historical Resources as defined in CEQA Guidelines Section 15064.5.

Finding: The Proposed Project plans for the construction of new buildings and structures. Modification of existing buildings and structures could also occur in the Planning Area. Although there are no previously recorded archaeological resources within the Planning Area, future projects involving intensive grading, trenching, excavation, soil stockpiling, and other earthmoving activities could impact previously unrecorded cultural resources. Implementation of the Proposed Project has the potential to damage or destroy archaeological and historic architectural resources that qualify as historical resources or unique archaeological resources under CEQA. The significance of such resources could be materially impaired because their ability to convey significance could be destroyed or diminished. This impact is considered significant. Mitigation is included (FEIR, pp. 4.6-25 through 4.6-29).

> Mitigation Measure 4.6-1a – The 2035 General Plan should be amended to include the following modified policy:
>
> Policy 2.O.3. Relocation of Historic Buildings. Where feasible and appropriate, encourage the relocation of reusable historic buildings within or into historic neighborhoods as a means of historic preservation. Relocation is only permitted with reuse provisions and timing agreements in place. Upon execution of an agreement covering reuse provisions and approval of a replacement project.
>
> Policy 2.P.2. Environmental Review. Require that environmental review be conducted for alterations and/or demolition of buildings designated as, or potentially eligible for designation as, historic structures as required by Chapter 12A of the Municipal Code and CEQA regulations.
>
> Mitigation Measure 4.6-1b – The 2035 General Plan should be amended to include the following new implementation program (Implementation Program Cultural 1)
> Projects that could have significant adverse impacts to potentially significant archaeological resources shall be required to assess impacts and provide feasible mitigation. The following steps, or those deemed equally effective by the City, will be followed:

a. Request information from the California Native American Heritage Commission to obtain a review of the Sacred Lands File and a list of local Native American groups and individuals that may have specific knowledge of cultural resources in the area that could be affected by project implementation. Each Native American group and individual identified by the Native American Heritage Commission will be contacted to obtain any available information on cultural resources in the project area. Additional consultation with relevant tribal representatives may be appropriate depending on the relative level of cultural sensitivity.

b. Request updated information from the Northwest Information Center of the California Historical Resources Information System to determine whether the project area has been previously surveyed and whether archaeological resources were identified. In the event the records indicate that no previous survey has been conducted or existing survey data is greater than five years old, the applicant will retain the services of a qualified archaeologist to assess the adequacy of the existing data (if any) and assess the archaeological sensitivity of the project area. If the survey did not meet current professional standards or regulatory guidelines, or relies on outdated information, a qualified archaeologist will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for archaeological resources.

c. If a survey is warranted, it will include all necessary background research in addition to an archaeological pedestrian survey. Based on findings of the survey, additional technical studies may be required, such as geoarchaeological sensitivity analysis, or other analysis scaled according to the nature of the individual project. A report will document the results of the survey and provide appropriate management recommendations, and include recordation of identified archaeological resources on appropriate California Department of Parks and Recreation site record forms and cultural resources reports.

d. Management recommendations may include, but are not limited to additional studies to evaluate identified sites or archaeological monitoring at locations determined by a qualified archaeologist to be sensitive for subsurface cultural resource deposits.

e. Once approved by the City, provide the Northwest Information Center with appropriate California Department of Parks and Recreation site record forms and cultural resources reports for any resources identified. Any subsequent reports completed as a result of additional technical work will likewise be submitted to the Northwest Information Center.

f. If no archeological resources are identified that may be directly or indirectly impacted by project activities, mitigation is complete as there would be no adverse change to documented archeological resources. The exception would be in the event of the discovery of a previously unknown archaeological site inadvertently exposed during project implementation. In such an event, a qualified archaeologist will be retained to assess the discovery and provide management recommendations as necessary.

g. When a project will impact a known archaeological site, and avoidance is not a feasible option, a qualified archaeologist shall evaluate the eligibility of the site for listing in the California Register of Historic Resources. If the archaeological site is found to be a historical resource as per CEQA Guidelines Section15064.5 (a)(3), the qualified archaeologist shall recommend further mitigative treatment which could include preservation in place or data recovery.

h. If a site to be tested is prehistoric, local tribal representatives should be afforded the opportunity to monitor the ground-disturbing activities. Appropriate mitigation may include curation of artifacts removed during subsurface testing.

i. If significant archaeological resources that meet the definition of historical or unique archaeological resources are identified in the project area, the preferred mitigation of impacts is preservation in place. If impacts cannot be avoided through project design, appropriate and feasible treatment measures are required, which may consist of, but are not limited to actions,

such as data recovery excavations. If only part of a site will be impacted by a project, data recovery will only be necessary for that portion of the site. Data recovery will not be required if the implementing agency determines prior testing and studies have adequately recovered the scientifically consequential information from the resources. Studies and reports resulting from the data recovery shall be deposited with the Northwest Information Center. Archaeological sites known to contain human remains shall be treated in accordance with the provisions of Section 7050.5 Health and Safety Code.

Mitigation Measure 4.6-1c – The 2035 General Plan should be amended to include the following new implementation program (Implementation Program Cultural 2)
For projects that could adversely affect a potential historic resources:

a. Consult the City's Historic Resources Inventory and, as necessary, seek updated information from the North Central Information Center or other applicable data repositories to determine whether the project area has been surveyed, and whether historic built environment resources were identified.

b. If a survey of the property or the area in which the property is located has not been conducted, a qualified architectural historian shall conduct a study of the project area for the presence of historic built environment resources.

c. If a study is required, it will evaluate the significance of built environment resources greater than 50 years in age that may be directly or indirectly impacted by project activities. The study may include a field survey; background, archival and historic research; and consultation with local historical societies, museums or other interested parties; as necessary.

d. If necessary, the qualified architectural historian's study will recommend appropriate protection or mitigative treatment, if any, and include recordation of identified built environment resources on appropriate California Department of Parks and Recreation (DPR) series 523 forms. Recommended treatment for historical resources identified in the report shall be implemented.

e. If no significant historic built environment resources are identified in the study or prior survey of the project area that may be directly or indirectly impacted by project activities, there is no adverse change to documented historical built environment resources and no further action is required.

f. If a significant historic built environment resource could be directly or indirectly impacted by project activities, avoidance shall be considered the primary mitigation option. If avoidance is not feasible, then the maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation, or reconstruction of the historical resource, conducted in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties will reduce impacts to an acceptable level. If adherence to the Secretary of the Interior's Standards cannot avoid materially altering in an adverse manner the physical characteristics or historic character of the surrounding environmental setting that contribute to a resource's historic significance, additional mitigation may be required.

g. If avoidance is not feasible and minimizing impacts through adherence to the Secretary of the Interior's Standards for the Treatment of Historic Properties is not feasible, documentation is required using, as appropriate, Historic American Buildings Survey (HABS), Historic American Engineering Record (HAER), and/or Historic American Landscapes Survey (HALS) guidelines.

Mitigation Measure 4.6-1d – The 2035 General Plan should be amended to include the following new implementation program (Implementation Program Cultural 3)

a. During ground-disturbing activities necessary to implement proposed development and infrastructure projects, if any prehistoric or historic subsurface resources are discovered, all work within 100 feet of the resources shall be halted and a qualified archaeologist shall be consulted within 24 hours to assess the significance of the find, according to CEQA Guidelines Section 15064.5, and implement, as applicable, CEQA Guidelines Sections 15064.5(d), (e), and (f).

b. If any find is determined to be a historical resource according to CEQA Guidelines Section 15064.5, representatives from the City and the archaeologist will meet to determine the appropriate avoidance measures or other appropriate mitigation. Cultural resources shall be recorded on appropriate Department of Parks and Recreation forms, and all significant cultural materials recovered shall be, as necessary and at the discretion of the qualified archaeologist and in consultation with the local Native American community if the discovery is prehistoric in age, subject to scientific analysis, professional curation, and documentation according to professional standards. If it is determined that the proposed development or infrastructure project could damage a historical resource or a unique archaeological resource (as defined pursuant to the CEQA Guidelines), mitigation shall be implemented in accordance with Section 21083.2 of the California Public Resources Code and CEQA Guidelines Section 15126.4, with a preference for preservation in place. Work may proceed on other parts of the project site while mitigation for historical resources or unique archaeological resources is being carried out. Preservation in place may be accomplished by planning construction to avoid the resource; incorporating the resource within open space; capping and covering the resource; or deeding the site into a permanent conservation easement.

c. If avoidance is not feasible, the qualified archaeologist shall develop and oversee the execution of a treatment plan. The treatment plan shall include, but shall not be limited to, data recovery procedures based on location and type of archaeological resources discovered and a preparation and submittal of report of findings to the Northwest Information Center of the California Historical Resources Information System. Data recovery shall be designed to recover the significant information the archaeological resource is expected to contain, based on the scientific/historical research questions that are applicable to the resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable resource questions. Data recovery, in general, should be limited to the portions of the historical property that could be adversely affected by project proponents' actions. Destructive data recovery methods shall not be applied to portions of the archaeological resources if nondestructive methods are practical.

The policies and implementation programs summarized above establish appropriate review procedures and consultation requirements, while also addressing the need for qualified personnel to undertake technical analysis, where necessary. The policies and implementation programs provide for the identification and evaluation of cultural resources, as well as for the assessment of potential impacts to such resources and the development of mitigation strategies. Additionally, CEQA review and local regulatory review provide additional levels of protection for known resources, and address the identification of unidentified cultural resources.

Although the policies and implementation programs will minimize the severity of significant impacts associated with such change, impacts may occur that cannot be reduced to a less-than-significant level through mitigation. Applicants for entitlements requiring General Plan consistency findings will need to comply with the policies described above. These policies and implementation programs will help ensure new development is designed to maintain important elements of the historic setting, where this is

important; preserve and rehabilitate historic structures in a way that preserves their integrity; relocate structures as method of historic preservation; and avoid impacts to archaeological and historic resources.

While the Proposed Project policies and implementation programs will reduce potential effects, the potential remains for residual effects.

Beyond existing regulations that protect cultural resources and these proposed policies and implementation programs, no further mitigation is available (FEIR, p. 4.6-29).

The impact would remain **significant and unavoidable** (FEIR, p. 4.6-29). As described in Section VIII, specific social, economic, and environmental benefits of the Project outweigh the identified potential unavoidable significant impacts.

Impact 4.6-2: Disturb Human Remains, including those Interred Outside of Formal Cemeteries.

Finding: The Proposed Project would result in development and infrastructure improvement projects throughout the Planning Area that would involve earthmoving activities that could impact human remains. There is the potential for discovery of human remains during construction. This impact is considered significant. Mitigation is included (FEIR, pp. 4.6-31 and 4.6-32).

Mitigation Measure 4.6-2 – The 2035 General Plan should be amended to include the following new implementation program (Implementation Program Cultural 4):

a. Consistent with Health and Safety Code, Section 7050 through 7052 and Health and Safety Code Section 8010 through 8030, in the event of the accidental discovery or recognition of any human remains in any location other than a dedicated cemetery during construction, the City and contractor/s shall take the following steps:

(1) No further excavation or disturbance of the project site or any nearby area reasonably suspected to overlie adjacent human remains will occur until:

(A) the coroner of Yolo County has been contacted to determine that no investigation of the cause of death is required, and

(B) if the coroner determines the remains to be Native American:

1. the coroner shall contact the Native American Heritage Commission within 24 hours;

2. the Native American Heritage Commission shall identify the person or persons it believes to be the most likely descendant from the deceased Native American; and

3. the most likely descendant may make recommendations 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, as provided in Section 5097.98 of the Public Resources Code; or

(2) Where the following conditions occur, the landowner or his or her authorized representative shall rebury the Native American remains and associated grave goods with appropriate dignity on the property in a location not subject to further subsurface disturbance:

(A) the Native American Heritage Commission is unable to identify a most likely descendant or the most likely descendant fails to make a recommendation within 24 hours after being notified by the commission;

(B) the most likely descendant identified fails to make a recommendation; or

(C) the landowner or his or her authorized representative rejects the recommendation of the most likely descendant, and mediation by the Native American Heritage Commission fails to provide measures acceptable to the landowner.

Because prehistoric and historic archaeological sites that contain human remains can occur below ground with little or no surface manifestation it may not be feasible to entirely avoid impacts to interred human remains during buildout of the General Plan, despite implementation of the City's proposed policies and mitigation measure. If buried human remains are encountered during construction without prior discovery they may be inadvertently damaged or destroyed (FEIR, p. 4.6-32).

The impact would remain **significant and unavoidable** (FEIR, p. 4.6-32). As described in Section VIII, specific social, economic, and environmental benefits of the Project outweigh the identified potential unavoidable significant impacts.

Noise and Vibration

Impact 4.11-1: Exposure of Noise-Sensitive Land Uses to Short-Term (Construction).

Finding: Future development and implementation of the policies in the Proposed Project would result in exposure of existing and proposed noise sensitive land uses to noticeable increases from construction activities. This impact is considered significant. Mitigation is included (FEIR, pp. 4.11-50 and 4.11-51).

Mitigation Measure 4.11-1 – The 2035 General Plan should be amended to include the following new implementation program (Implementation Program Noise 1)

a. Demolition, construction, site preparation, and related activities that would generate noise perceptible at the property line of the subject property are limited to the hours between 7:00 A.M. and 6:00 P.M. on Monday through Saturday and between 9:00 A.M. and 6:00 P.M. on Sunday and federal holidays. The building inspector may issue an exception to this limitation on hours in cases of urgent necessity where the public health and safety will not be substantially impaired.

b. Idling times for noise-generating equipment used in demolition, construction, site preparation, and related activities shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes.

c. Demolition, construction, site preparation, and related activities that do not involve pile driving proposed within 445 feet from the edge of properties with existing, occupied noise-sensitive uses shall incorporate all feasible strategies to reduce noise exposure for noise-sensitive uses, including:

- Provide written notice to all known occupied noise-sensitive uses within 400 feet of the edge of the project site boundary at least 2 weeks prior to the start of each construction phase of the construction schedule;
- Ensure that construction equipment is properly maintained and equipped with noise control components, such as mufflers, in accordance with manufacturers' specifications;
- Re-route construction equipment away from adjacent noise-sensitive uses;
- Locate noisy construction equipment away from surrounding noise-sensitive uses;
- Use sound aprons or temporary noise enclosures around noise-generating equipment;
- Position storage of waste materials, earth, and other supplies in a manner that will function as a noise barrier for surrounding noise-sensitive uses;
- Use the quietest practical type of equipment;
- Use electric powered equipment instead of diesel or gasoline engine powered equipment;
- Use shrouding or shielding and intake and exhaust silencers/mufflers; and

- Other effective and feasible strategies to reduce construction noise exposure for surrounding noise-sensitive uses.

d. For construction of buildings that require the installation of piles, an alternative to installation of piles by hammering shall be used. This could include the use of augured holes for cast-in-place piles, installation through vibration or hydraulic insertion, or another low-noise technique.

The above described implementation program would reduce construction noise exposure. However, for construction sites that are adjacent to noise-sensitive uses, there still could be a substantial temporary increase in noise levels that could lead to adverse noise-related impacts. The City is obliged to balance temporary noise impacts associated with implementation of the Proposed Plan with other environmental benefits, as well as economic, legal, social, technological, and other benefits. The City's focus on facilitating infill development in the Downtown area and along major corridors will help to achieve goals related to economic development, fiscal sustainability, and local employment opportunities. As noted in OPR's draft General Plan Guidelines update, "While urban infill developments can be noisy environments, they are often healthy communities. Residents whom opt to live in infill developments may welcome such noise, and there are many ways to minimize harmful exposure to excessive noise" (OPR 2015, page 185). While sites for future infill development may be located near noise-sensitive uses, these sites are also in proximity to a mix of housing and destinations. Locating a mix of uses in proximity to one another makes travel without the use of a car more practical, and this provides benefits related to mobility, air quality, and greenhouse gas emission reductions. Communities that make non-automobile trips (pedestrian, bicycle, transit) practical for more residents can also reduce traffic congestion for those who still need to drive. Land and transportation policies that reduce vehicle miles traveled (VMT) also reduce harmful air pollution and greenhouse gas emissions, enhance mobility, and reduce commuting time. Since transportation is a major cost for most households, making transportation without a car more feasible could also hold benefits related to reducing household transportation costs. Municipal costs can be reduced with compact, planned development. The City can help to free up discretionary income that can support expanded local retail activity through planning strategies that reduce travel and utility costs for households. Since infill sites are generally in areas that have access to existing infrastructure, infill development also holds potential benefits related to the up-front and ongoing cost of infrastructure. Implementation of this mitigation measure co would reduce impacts from construction noise. However, there could still be a noticeable temporary increase in noise levels for noise-sensitive uses that are adjacent to construction sites. There is no additional feasible mitigation (FEIR, p. 4.11-51).

The impact would remain **significant and unavoidable** (FEIR, p. 4.11-51). As described in Section VIII, specific social, economic, and environmental benefits of the Project outweigh the identified potential unavoidable significant impacts.

Impact 4.11-2: Exposure to or Generation of Long-Term Noise Levels.

Finding: Future development of new noise-sensitive land uses would occur under the Proposed Project within areas that either are currently exposed to noise from both transportation and non-transportation noise sources, or will be in the future. Uses allowed under the 2035 General Plan could potentially expose existing or planned noise-sensitive uses to noise levels that exceed local standards. The impact is considered significant. Mitigation is included. (FEIR, pp. 4.11-59 and 4.11-60).

Mitigation Measure 4.11-2a – Policy 8.G.3 should be amended as follows:

Policy 8.G.3 Noise Exposure from Transportation Sources. Require noise-reducing mitigation to meet allowable outdoor and indoor noise exposure standards in Table 8-6 [Table

4.11-13]. Noise mitigation measures that may be approved to achieve these noise level targets include but are not limited to the following:

- Construct facades with sound insulation to achieve acceptable interior noise;
- Use sound-rated windows for primary sleeping and activity areas;
- Use sound-rated doors for all exterior entries at primary sleeping and activity areas;
- Use setbacks and/or sound barriers where applicable, feasible, and reasonable;
- Use acoustic baffling of vents for chimneys, attic and gable ends;
- Install a mechanical ventilation system that provides fresh air under closed window conditions; and
- Maximize site design so that buildings shelter outdoor areas.

Mitigation Measure 4.11-2b – The 2035 General Plan should be amended to include the following new policies:

Policy 8.G.13 Noise Attenuation Barriers. Noise attenuation barriers are strongly discouraged, except to attenuate noise for existing developed uses, and may be used in the context of new developments only when no other approach to noise mitigation is feasible.

Policy 8.G.14 Vehicle Traffic. New developments shall disperse vehicular traffic onto a network of fully connected smaller roadways and minimize funneling of local traffic onto large-volume, high-speed roadways near existing or planned noise-sensitive land uses to the maximum extent feasible.

Policy 8.G.15 Operational Noise. In new development areas, service, utility, loading areas, roof-mounted equipment, and noise-generating equipment shall be screened, designed, and located to reduce visibility and noise for surrounding properties and pedestrian areas.

The policies referenced above would reduce long-term noise exposure impacts by establishing noise compatibility standards and requiring new development to include certain measures and strategies to achieve acceptable noise environments, wherever feasible. The Proposed Project provides options for different mitigation strategies and performance standards designed to avoid significant adverse noise exposure impacts. The effectiveness of the noise control strategy to bring the desired reduction in noise exposure depends on the physical characteristics of the development and existing surrounding environment. With the proposed intensification of land uses in Woodland, especially Downtown and along key corridors, noise control will be an increasing consideration for new development, particularly for infill projects. However, urban development generally experiences greater ambient (background) noise than rural areas and residents, employees, and visitors to more urban environments would generally be expected to be acclimated to relatively noisier conditions. In order to achieve the increased levels of density and development intensity outlined in this 2035 General Plan, somewhat greater ambient noise levels must be acknowledged and accepted. The noise standards established in the 2035 General Plan accept 70 dB as being in the "normally acceptable" range for residential uses, as compared with 60 dB in the previous 2002 General Plan. This policy supports the development of infill projects Downtown and along key corridors by setting a realistic, achievable threshold of impact for new development that acknowledges the somewhat greater noise levels associated with a vibrant, urban environment in appropriate locations. This policy could result in a greater number of new noise sensitive uses that are exposed to ambient noise levels between 60 dB and 70 dB compared to what may have occurred under the previous General Plan.

Similarly, Policy 8.G.7 addresses acceptable noise levels associated with roadway improvement projects, changing from 60 dB to 70 dB areas where an increase in 5 dB increase is considered significant; increasing from 60-65 to 70-75 areas where an increase of 3 dB is considered significant; and increasing from greater than 65 to greater than 75 areas where a 1.5 dB increase is considered significant. This policy

change from the 2002 General Plan relaxes the baseline against which noise increases attributable to roadway improvement projects are assessed.

Policies in the 2035 General Plan establish noise performance standards and require feasible mitigation. Implementation of policies in the Proposed Project, as described above, would reduce the potential for significant noise exposure impacts. Although the policies are designed to avoid substantial disturbances to noise-sensitive receptors, the City anticipates that, despite implementation of feasible noise reduction strategies, noise-sensitive uses could be exposed to noise in exceedance of the City's standards, including noise generated by new development anticipated under the Proposed Project. The City cannot demonstrate at this time that policies in the Proposed Project would reduce impacts of each project and upon each project that could be developed under the 2035 General Plan to a less-than-significant level (FEIR, p. 4.11-60).

The impact would remain **significant and unavoidable** (FEIR, p. 4.11-60). As described in Section VIII, specific social, economic, and environmental benefits of the Project outweigh the identified potential unavoidable significant impacts.

Impact 4.11-3: Exposure to or Generation of Vibration.

Finding: Construction of projects under the Proposed Project could cause temporary, short-term disruptive vibration for locations near sensitive receptors. Under the Proposed Project, future development of new vibration-sensitive land uses could occur within vibration-generating areas (e.g., railroads). This impact is considered significant. Mitigation is included (FEIR, pp. 4.11-62 and 4.11-63).

> Mitigation Measure 4.11-3a – The 2035 General Plan should be amended to include the following new implementation program (Implementation Program Vibration 1)
>
> a. New development that proposes the use of piles for foundations shall include all feasible measures necessary with the goal to ensure that vibration exposure for adjacent buildings is less than 0.5 PPV and less than 80 VdB for adjacent vibration-sensitive uses and less than 0.2 PPV for adjacent historic buildings. These performance standards shall take into account the reduction in vibration exposure that would occur through coupling loss provided by each affected building structure. If it is determined necessary to avoid damage, the project applicant shall coordinate with the Chief Building Official to implement corrective actions, which may include, but is not limited to building protection or stabilization.
>
> b. New developments that would generate substantial long-term vibration shall provide analysis and mitigation, as feasible, to achieve velocity levels, as experienced at habitable structures of vibration-sensitive land uses, of less than 80 vibration decibels.
>
> Mitigation Measure 4.11-3b – Implement Mitigation Measure 4.11-1

As described above, the new implementation programs require use of project-specific vibration mitigation measures (preparation of vibration analysis and implementation of vibration abatement measures, as necessary and to the greatest extent feasible) and best practices during construction to mitigate vibration impacts to sensitive land uses. Implementation would reduce the potential for vibration levels in areas of new vibration-sensitive land uses and the level of impact associated with temporary construction-related vibration exposure for sensitive uses. However, the City cannot determine at this time that potentially significant vibration-related impacts would be avoided in every instance. There is no additional feasible mitigation (FEIR, p. 4.11-63).

The impact would remain **significant and unavoidable** (FEIR, p. 4.11-63). As described in Section VIII, specific social, economic, and environmental benefits of the Project outweigh the identified potential unavoidable significant impacts.

C. Mandatory Findings of Significance

CEQA Guidelines Section 15065(a) states that a project may have a significant effect on the environment when one of the following four conditions occurs:

> (1) The project has the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of an endangered, rare, or threatened species, or eliminate important examples of the major periods of California history or prehistory.
>
> (2) The project has the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals.
>
> (3) The project has possible environmental effects that are individually limited but cumulatively considerable, which means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.
>
> (4) The environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly.

Section 15061(a)(1) states that a lead agency shall find that a project may have a significant effect on the environment when there is substantial evidence that the project has the potential to (1) substantially reduce the habitat of a fish or wildlife species; (2) cause a fish or wildlife population to drop below self-sustaining levels; (3) substantially reduce the number or restrict the range of an endangered, rare, or threatened species; or (4) eliminate important examples of major periods of California history or prehistory. The EIR fully addresses any impacts that might relate to reduction of habitat and the effect on species. Impacts related to wildlife and plant species are addressed under Impacts 4.4-1, 4.4-2, 4.4-3, 4.4-4, and 4.4-8, and as outlined above, impacts are less than significant with mitigation. Historic and prehistoric impacts are addressed under Impact 4.6-1 and 4.6-2 and, as outlined above, impacts are significant and unavoidable.

Section 15061(a)(2) states that a lead agency shall find that a project may have a significant effect on the environment when there is substantial evidence that the project has the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals. Chapter 6 of the EIR includes a section on Significant Irreversible Environmental Effects of the Proposed Project. In addition, Section 6.4 of the EIR identifies all significant and unavoidable impacts that could occur and create a long-term impact on the environment. Finally, Chapter 6 of the EIR also identifies any long-term environmental impacts caused by the Proposed Project.

Section 15061(a)(3) states that a lead agency shall find that a project may have a significant effect on the environment when there is substantial evidence that the project has potential environmental effects that are individually limited but cumulatively considerable. This means that the "incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects

of other current projects, and the effects of probably future projects." Cumulative impacts are addressed for each of the environmental topics in the EIR and are discussed in Chapter 6 of the EIR.

Section 15065(a)(4) requires a lead agency to find that a project will have a significant effect on the environment when there is substantial evidence that the project has the potential to cause substantial adverse effects on human beings, either directly or indirectly. This factor relates to effects to the environment on human beings generally but not to effects on specific individuals. Any of the environmental effects analyzed in the EIR could cause adverse impacts to human beings, but all impacts that could directly affect human beings (such as aesthetics, air quality, hazardous materials, hydrology, flooding, and water quality, noise and vibration, and transportation) were examined in Chapter 4 of the EIR.

The City Council therefore finds that the EIR for the Proposed Project has analyzed all four mandatory findings of significance.

D. Mitigation Monitoring and Reporting Program

Pursuant to CEQA Guidelines Section 15091(d), the City has included all feasible mitigation measures that avoid or substantially lessen the potentially significant and significant effects of the Proposed Project as policies or implementation programs. Public Resources Code Section 21081.6(b) and CEQA Guidelines Section 15097(b) establish that when the project examined in an EIR is a general plan, mitigation measures may be incorporated into the plan. This is the approach taken by the City. These mitigation measures are fully enforceable by the City Council. As such, the General Plan and CAP are considered self-mitigating, and the only action required for full implementation of the MMRP is adoption of the General Plan and CAP.

The MMRP includes Table 2-1, which contains the final revised summary of the impacts and mitigation measures, and is simultaneously being adopted by the City Council with its Resolution Certifying the EIR for the Proposed Project.

E. Growth Inducement

Chapter 6, "Other CEQA Considerations," of the Draft EIR provides a discussion of the growth-inducing impacts of the 2035 General Plan pursuant to Section 15126.2(d) of the CEQA Guidelines. The 2035 CAP would not create any growth-inducing impacts as it does not propose development or land use changes, does not propose infrastructure that would induce development, and does not include components that could induce growth. Rather, it provides a roadmap for reducing emissions of GHG emissions to achieve specified targets over time.

The EIR analysis points out that by definition, the 2035 General Plan is intended to provide for, and address future growth in the City. The goals, policies, and implementation programs of the 2035 General Plan provide a framework for long-term growth and conservation within the City's Planning Area. The General Plan is required by State law to be long-term in its focus, addressing physical development within and outside the City's jurisdiction that is related to the City's planning.

Revisions to the General Plan are required in order to address long-range goals related to land use, transportation, public health and safety, housing, open space and conservation, economic development, fiscal sustainability, climate change, and other topics that are a focus of the Final 2035 General Plan. The environmental consequences related to the potential for direct growth are analyzed throughout Chapter 4,

"Environmental Impact Analysis," of the Draft EIR and discussed herein in Section VII.C (Significant Effects and Mitigation Measures). Other indirect growth-inducing impacts are analyzed including the following: (1) inducement of substantial unanticipated population growth; (2) economic expansion resulting in jobs and housing growth; (3) elimination of obstacles to growth; and (4) result in service, facility, or infrastructure demand.

The growth inducement analysis states that with the amount of new development planned under the 2035 General Plan, it is possible that, through expansion of job opportunities or other aspects of the 2035 General Plan, growth elsewhere could be facilitated. If jobs are created that cause people to move to the Planning Area or nearby communities and create a demand for housing construction beyond that provided under the 2035 General Plan, the 2035 General Plan could be considered growth inducing.

The EIR analysis states that whether or not obstacles to growth are eliminated relates to the extent to which the 2035 General Plan would increase infrastructure capacity or change the regulatory structure such that additional development beyond that assumed in the EIR would be facilitated. A physical obstacle to growth typically involves insufficient or no infrastructure and insufficient public service capacity. The extension of public service infrastructure (e.g., roadways, water and sewer lines) into areas that are not currently provided with these services would be expected to support new development. Similarly, the elimination or change to a regulatory obstacle, including existing growth and development policies, could result in new growth. With respect to the Proposed Project, development in new growth areas is anticipated. Therefore, the 2035 General Plan would facilitate elimination of growth obstacles that would result in new growth.

The 2035 General Plan does anticipate development of currently undeveloped areas. This could result in infrastructure being extended into areas that are currently undeveloped and result in pressure to plan for and entitle development beyond that anticipated under the 2035 General Plan. The 2035 General Plan includes policies for both infill and new development that would avoid unplanned development that could be induced through infrastructure expansions into new growth areas. This reduces the potential for unplanned, induced growth. An important consideration that limits growth within the City is the City's urban limit line, which sets an ultimate boundary around the City. Because the urban limit line was approved as a voter initiative in 2006, the urban limit line may only be modified by another vote by the people. Additionally, the initiative measure approving the urban limit line also places restrictions on the provision of services outside of the urban limit line. Both parts of this initiative provide an effective constraint to induced growth outside of the City's boundaries.

However, the EIR analysis concludes that it is possible for the Proposed Project to induce growth that could have indirect effects. The analysis concludes that the purpose of the 2035 General Plan is to provide for future development of new housing and employment opportunities. The EIR concludes that the indirect effects on the environment would have a significant and unavoidable impact, and there are no feasible mitigation measures beyond those already embodied in the Final 2035 General Plan to reduce this impact to a less-than-significant level without changing the purposes of the 2035 General Plan. The City Council finds that due to the overriding considerations set forth in Section VIII below, the benefits of the Proposed Project outweigh its growth-inducing impacts.

F. Significant Irreversible Environmental Changes

Chapter 6.0, "Other CEQA Considerations," of the Draft EIR examines "significant irreversible environmental changes" pursuant to Section 15126.2(c) of the CEQA Guidelines. The Proposed Project includes both the 2035 General Plan and the 2035 CAP. The CAP is designed to reduce impacts associated

with GHG emissions and will provide air quality and other benefits. The 2035 CAP will not create any significant irreversible environmental impacts.

However, development allowed under the 2035 General Plan is identified as contributing to the following significant irreversible environmental changes: (1) changes in land use which would commit future generations; (2) irreversible changes from environmental actions; and (3) consumption of non-renewable resources.

Specifically, the EIR analysis identifies the following items as significant and unavoidable outcomes of implementation of the 2035 General Plan for which there are no known additional feasible mitigation measures beyond those already embodied in the Final General Plan: urban development in areas the previous 2002 General Plan designated urban reserve; irreversible loss of agricultural land and existing wildlife habitats; environmental disturbance from development; increased traffic, air pollution, GHG emissions, and noise; use of non-renewable resources during construction, such as lumber and other forest products, sand and gravel, asphalt, petrochemical construction materials, steel, copper, lead, and water; potential for accidental release of hazardous materials; and nonrenewable energy use.

The EIR concludes that there is no feasible mitigation without changing the 2035 General Plan purposes and that the impacts are significant and unavoidable. However, and as explained below in Section VIII of these Findings, the City Council finds that the benefits of the Proposed Project outweigh the significant and unavoidable growth-inducing effects caused by the Proposed Project.

G. Cumulative Impacts

CEQA Guideline 15130(b)(1) requires an EIR to either analyze (a) a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, projects outside of the agency's control or (b) a summary of projections contained in an adopted local, regional, or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. These plans may include a general plan, a regional transportation plan, or plans for the reduction of greenhouse gas emissions. The summary of projections may also be contained in an adopted or certified prior environmental document for one of these plans, and the projections may be supplemented with additional information.

Chapter 6.0, "Other CEQA Considerations," of the EIR contains an analysis of the cumulative impacts, pursuant to Section 15130 of the CEQA Guidelines. The analysis in the EIR uses the second method described above, the "plan method," and analyzes cumulative issues based on regional growth projections. The analysis examines population, housing, and employment growth for the six-county Sacramento Area Council of Governments (SACOG) region, which includes the City of Woodland. SACOG's Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) includes a regional-scale land use change scenario covering the period from 2012 to 2036. This represents past, present, and probable future projects that may have impacts to which the Proposed Project would contribute (past, present, and future projects are collectively known as the "Cumulative Context").

The Cumulative Scenario for the Proposed Project considers buildout of the City's Planning Area if all vacant and underutilized parcels within the Planning Area developed. Regional cumulative impacts are analyzed within each CEQA issue area and contribution of buildout of the City's Planning Area in each impact area is considered. The following conclusions are reached:

1. Aesthetics and Visual Resources

Implementation of the Cumulative Scenario would allow for greater density and development intensity in certain infill areas – particularly areas designated Downtown Mixed Use and Corridor Mixed Use under the Final 2035 General Plan. Taller or larger buildings do not necessarily constitute a visual impact. In addition to adding uses and density, new investment in urban infill areas typically improves visual quality by developing vacant or underutilized properties and improving maintenance of existing structures and yards. Nonetheless, the Cumulative Scenario would change the visual character of the Planning Area, which would be perceived within the Planning Area, as well as from adjacent areas. In addition, the Cumulative Scenario would contribute nighttime light to the already increasing amount of light pollution in the region. Mitigation measures in Section 4.1, "Aesthetics and Visual Resources," of the EIR and 2035 General Plan policies establish high standards for design and compatibility with a project's surroundings; however, there is no feasible mitigation that would avoid changing the visual character of the Planning Area while also allowing the City to accomplish its Vision and Guiding Principles for the 2035 General Plan. The Proposed Project would make a cumulatively considerable contribution to significant cumulative regional impacts. The cumulative impact is **significant and unavoidable**. However, and as explained below in Section VIII, the benefits of the Proposed Project outweigh the significant and unavoidable environmental effects of these cumulative impacts.

2. Agricultural Resources

The conversion of farmland in the region constitutes a significant cumulative impact. As described in Section 4.2, "Agriculture and Forestry Resources," of the Draft EIR, multiple policies are identified in the 2035 General Plan to manage agricultural land conversion, including an ULL that is designed to protect agricultural land surrounding the City limits, which would reduce the potential impact associated with conversion of agricultural land. The 2035 General Plan also requires mitigation for lost farmland within the ULL at a rate of one acre of permanently conserved farmland for every acre converted to urban development or non-agricultural uses. Notwithstanding these policies, there is no feasible mitigation that would allow the City to implement the 2035 General Plan according to the City's Vision and Guiding Principles, while also avoiding the conversion of farmland. No additional feasible mitigation, in addition to those discussed above, are available to further reduce the impact. The conversion of farmland that would occur under the Cumulative Scenario will contribute to the loss of agricultural land in the region, which is an irreversible loss of a shared and finite resource. The loss of farmland associated with the Cumulative Scenario makes a cumulatively considerable contribution, and the impact is considered **significant and unavoidable**. However, and as explained below in Section VIII, the benefits of the Proposed Project outweigh the significant and unavoidable environmental effects of these cumulative impacts.

3. Air Quality

By its nature, air pollution has cumulative impacts. The implementation of plans and projects within the Sacramento Valley Air Basin would contribute to this impact on a cumulative basis, and this regional impact is a significant cumulative impact. The Cumulative Scenario of the Proposed Project would generate construction-related and operational criteria air pollutants and precursor emissions that would exceed Yolo-Solano Air Quality Management District's thresholds of significance. This is a cumulatively considerable contribution to a significant cumulative impact. The 2035 General Plan policies, mitigation included in Section 4.3, "Air Quality," of the Draft EIR, and strategies outlined in the 2035 CAP will reduce emissions, but it is not possible to demonstrate with reasonable certainty that emissions would be reduced below applicable thresholds. There is no additional feasible mitigation. As a result, this cumulative impact is **significant and unavoidable.** However, and as explained below in Section VIII, the

benefits of the Proposed Project outweigh the significant and unavoidable environmental effects of these cumulative impacts.

Existing toxic air contaminant sources in the Planning Area include mobile sources, stationary sources, and areawide sources, which all cumulatively contribute to the existing toxic air contaminant concentrations and the associated health risk. Implementation of the Cumulative Scenario of the Proposed Project would generate additional vehicle trips within the Planning Area that would increase vehicle volumes at local intersections. The 2035 General Plan includes policies that would require buffers between sensitive land uses and sources of toxic air contaminants (TACs), and Section 4.3 of the Draft EIR recommends detailed mitigation that would ensure against exposure of sensitive receptors to substantial pollutant concentrations – both as a result of construction and operation of the Proposed Project. As a result, this impact is **less than cumulatively considerable**.

4. Biological Resources

Adverse regional impacts on palmate-bracted bird's beak, vernal pool habitat and associated vernal pool species, and alkali prairie sink habitat, giant garter snake, and Swainson's hawk are considered significant cumulative impacts. Buildout of the Cumulative Scenario would preserve the remaining occurrences of palmate-bracted bird's beak; preserve the known remaining vernal pool habitat and vernal pool species, including vernal pool fairy shrimp, vernal pool tadpole shrimp, and California tiger salamander; and preserve both the known remaining alkali prairie/sink habitat and the majority of known occurrences of special-status plant species, including alkali milk-vetch, brittlescale, San Joaquin spearscale, and Heckard's peppergrass, in the Planning Area. Therefore, implementing the Cumulative Scenario would not have a cumulatively considerable contribution to significant cumulative impacts. Impacts associated with loss of palmate-bracted bird's beak, loss of vernal pool habitat and associated vernal pool species, and loss of special-status species associated with alkali prairie sink habitat are less than cumulatively considerable.

With successful implementation of the 2035 General Plan policies, mitigation measures in Section 4.4 of the EIR, "Biological Resources," and compliance with existing State and federal regulations, the Cumulative Scenario of the Proposed Project would not have a cumulatively considerable contribution to the giant garter snake or Swainson's hawk. Impacts associated with the loss of giant garter snake and Swainson's hawk are **less than cumulatively considerable**.

5. Climate Change, Greenhouse Gas Emissions, and Energy

The Cumulative Scenario would result in GHG emissions associated with construction and long-term operations. The Proposed Project commits the City to revisiting the emissions inventory and CAP reduction strategies when new information is available and making appropriate changes. Policies in the 2035 General Plan, reduction strategies in the 2035 CAP, and mitigation identified in Section 4.5 of the EIR, "Climate Change, Greenhouse Gas Emissions, and Energy," of the Draft EIR will reduce local GHG emissions and commit the City to adjust policies and reduction measures, as needed, when future information related to the State's efforts become available. In addition, Mitigation Measure 4.5-1a provides additional clarity and requires the City to maintain and revise, as necessary, a Climate Action Plan that would achieve local emission rates for relevant emission sectors consistent with the State's own reduction targets outlined in AB 32, Executive Order B-30-15, SB 32, and Executive Order S-3-05. The City will update GHG inventories, evaluate the performance of individual strategies, evaluate progress toward the City's reduction targets, and make revisions to strategies, as necessary, to ensure that the City will achieve its targets. With mitigation, the impact is **less than cumulatively considerable**.

Under the Cumulative Scenario, the City does not anticipate any unusual or atypical project characteristics that would generate the need for construction equipment that would be less energy-efficient than at comparable construction sites in other parts of the region or state. In addition, the Cumulative Scenario includes developments that would improve overall energy efficiency (energy demand per unit of development – per capita and per square footage of non-residential development, for example). The Cumulative Scenario would not be expected to cause the inefficient, wasteful, or unnecessary consumption of energy. Furthermore, by adhering to the policies proposed in the 2035 General Plan, as well as all applicable State and federal requirements pertaining to energy facilities construction and operation, and mitigation imposed in the Draft EIR, impacts associated with construction and operation of energy facilities to meet Cumulative Scenario demands would be substantially reduced. This impact is **less than cumulatively considerable**.

6. Cultural Resources

Future development and infrastructure improvements associated with the Cumulative Scenario could result in significant impacts to historical resources and archaeological resources through either direct physical impacts or by indirect impacts. Though record searches did not identify known archaeological resources in the Planning Area, the broader vicinity does have sensitivity for undiscovered resources. When projects occur in existing developed areas, and depending on the context, development could add incompatible architectural elements; diminish the historic integrity of a cultural resources setting, feeling, or association; or destroy the historic character of a property. Although the policies of the 2035 General Plan and mitigation proposed in Section 4.6, "Cultural Resources," of the EIR will minimize the severity of significant impacts associated with the above described changes, impacts cannot altogether be avoided. Therefore, the Cumulative Scenario would have a cumulatively considerable contribution to the significant cumulative impact related to cultural resources. This cumulative impact is **significant and unavoidable**. However, and as explained below in Section VIII, the benefits of the Proposed Project outweigh the significant and unavoidable environmental effects of these cumulative impacts.

7. Geology, Soils, Mineral Resources, and Paleontological Resources

Construction activities associated with the Cumulative Scenario would result in substantial grading, excavation, and movement of earth associated with site preparation activities. These activities would increase soil erosion, especially from wind and water, and increase the potential for siltation of local drainages. All applicable projects are required to comply with the California Building Code, City of Woodland Stormwater Management Program and National Pollutant Discharge Elimination System (NPDES) regulations, including construction site storm water pollution prevention plans (SWPPPs) and best management practices (BMPs). Therefore, the cumulative effects associated with geology and soils would be less than cumulatively considerable. In addition, with implementation of 2035 General Plan policies and mitigation described in Section 4.7 of the EIR, "Geology, Soils, Mineral Resources, and Paleontological Resources," the impacts of the Cumulative Scenario on paleontological resources would be **less than cumulatively considerable**.

8. Hazards and Hazardous Material

Hazardous materials and other public health and safety issues are generally site-specific and would not be significantly affected by other development in the region. The Cumulative Scenario anticipates growth that will likely result in an increase in routine use, transportation, and disposal of hazardous materials, as well as handling of hazardous materials near existing or proposed schools. In addition, the Cumulative

Scenario would result in development within the Airport Land Use Commission (ALCU) policy area boundaries. However, existing federal, State, and local regulations and implementation of 2035 General Plan policies enforce standards for the routine use, transportation, and disposal of hazardous materials and land uses within the ALCU boundaries. Therefore, the cumulative effects associated with hazards and hazardous materials would be **less than cumulatively considerable**.

9. Hydrology and Water Quality

Projects that could be facilitated under the Cumulative Scenario are subject to City's Phase II Municipal Separate Storm Sewer System (MS4) permit requirements that would require developments to minimize the area of impervious surfaces and infiltrate or reuse storm runoff from project sites so that there would not be an increase in flow volume compared to pre-project conditions. There is **no cumulatively considerable contribution to any significant cumulative impact** associated with long-term water quality or groundwater recharge.

Although the Cumulative Scenario anticipates more growth in these areas than under the Proposed Project, the amount of growth in these areas is not relevant to this impact analysis because proposed Policy 2.B.2 applies at all intensities of buildout in SP-2 and SP-3A. The implementation of the Cumulative Scenario would not increase or add to the impacts already discussed in Section 4.9 of the EIR, "Hydrology, Flooding, and Water Quality." In addition, Policy 8.B.6 requires that structures would not redirect flows onto adjacent properties. Similar to Policy 2.B.2, Policy 8.B.6 applies to all development. The Cumulative Scenario makes a **less than cumulatively considerable contribution** to this potentially significant cumulative impact for flood hazard areas.

However, under the Cumulative Scenario, the City anticipates development in the levee inundation area and cannot guarantee that levees will not fail. The Cumulative Scenario would make a cumulatively considerable contribution to this significant cumulative impact. There is no additional feasible mitigation beyond that proposed in the 2035 General Plan to address this impact. This cumulative impact in dam and levee inundation areas is **significant and unavoidable**. However, and as explained below in Section VIII, the benefits of the Proposed Project outweigh the significant and unavoidable environmental effects of these cumulative impacts.

10. Land Use Planning, Population, and Housing

There are no significant cumulative impacts regarding land use planning; therefore, the Cumulative Scenario would not have any cumulatively considerable contribution to a significant cumulative impact. However, the population, housing, and employment projections under the Cumulative Scenario would be substantially larger than the SACOG projections. If non-residential development is attracted to Woodland beyond the levels currently forecast by SACOG, this could attract additional residential development to the Planning Area, as new residents seek opportunities to live near their new jobs. Policies in the 2035 General Plan and mitigation described within the environmental topic-specific sections of the Draft EIR reduce potential effects associated with both residential and non-residential development within the Planning Area assumed under the Cumulative Scenario. The City's Urban Limit Line (ULL) and associated policies are designed to manage growth within the Planning Area to avoid adverse effects, such as unplanned development indirectly facilitated by planned development within the ULL. The City's ULL can only be modified by the voters. While the voter-approved ULL prevents conversion of additional agricultural land outside of the ULL, the City could increase land use density/intensity to allow for additional development to meet demand and/or neighboring jurisdictions may experience increased demand for additional development as a result. For these reasons, this cumulative impact is **significant**

and unavoidable. However, and as explained below in Section VIII, the benefits of the Proposed Project outweigh the significant and unavoidable environmental effects of these cumulative impacts.

11. Noise and Vibration

Noise is generally a localized impact that does not have regional or cumulative considerations. Stationary noise sources within Woodland's Planning Area would not generally combine with noise sources outside the Planning Area to create a cumulative increase in stationary noise. However, development forecast under the MTP/SCS would generate and attract vehicular travel along roadways located throughout the region, including within and near the City's Planning Area, which would combine with traffic associated with development in the Planning Area to increase vehicular traffic noise in areas directly adjacent to travelways. Implementation of policies in the 2035 General Plan and mitigation described in Section 4.11, "Noise and Vibration," of the Draft EIR would reduce the potential for noise exposure for noise-sensitive land uses – both existing and future planned noise-sensitive uses. While in most locations and for most projects, compliance with General Plan policies and EIR mitigation would reduce ambient noise levels to acceptable levels, it is not possible to demonstrate with reasonable certainty at this time that no significant noise exposure impacts could occur within the Planning Area as a result of the Cumulative Scenario. In addition, it is possible that traffic generated under the Cumulative Scenario could combine with traffic generated by existing and future development throughout the SACOG region to increase vehicular traffic noise along regional roadways to levels that are deemed unacceptable to Yolo County, Sacramento County, the City of Sacramento, and other local agencies in the region. There is no additional feasible mitigation. The cumulative impact is **significant and unavoidable**. However, and as explained below in Section VIII, the benefits of the Proposed Project outweigh the significant and unavoidable environmental effects of these cumulative impacts.

12. Public Services and Recreation

Public services are generally provided by local governments and/or special districts for areas within their jurisdiction and are not provided on a regional basis. The Cumulative Scenario includes changes in land use and the density and intensity of development that would create demand for new fire protection services, law enforcement and emergency services, school facilities, and parks in the Planning Area. The 2035 General Plan includes policies to ensure that sufficient fire, police, and school facilities and services, as well as sufficient parks and recreation facilities are provided to serve additional growth. Therefore, cumulative impacts on public services would be **less than cumulatively considerable**.

13. Transportation and Circulation

The Cumulative Scenario is expected to result in 33 roadway segments with level of service (LOS) D, one with LOS E, and one with LOS F. The only unacceptable LOS condition would occur on East Gum Avenue from Bourn Drive to Pioneer Avenue. This segment is projected to operate at LOS F under the Cumulative Scenario, while the acceptable LOS threshold is LOS C. The traffic volume growth on this segment is over 100 peak hour trips. Implementing Mitigation Measure 4.13-1a in Section 4.13, "Transportation and Circulation," of the Draft EIR would reduce the impact. This impact is **less than cumulatively considerable**.

14. Utilities and Service Systems

The Proposed Project's contribution to the Cumulative Scenario associated with the provision of utilities and service systems are considered below:

a. Water Supply and Infrastructure

The City has not analyzed the availability of water supply beyond the population anticipated from the Proposed Project through 2035. Therefore, it is possible the water demand from the Cumulative Scenario may exceed supply. Because the City has not analyzed the water supply for the Cumulative Scenario and cannot state with any certainty what impact on water supply new development will have, this is assumed to be a cumulatively considerable contribution. There is a potential **significant and unavoidable impact**. However, and as explained below in Section VIII, the benefits of the Proposed Project outweigh the significant and unavoidable environmental effects of these cumulative impacts.

b. Wastewater

Implementation of the Cumulative Scenario would result in increased development and therefore greater amounts of wastewater effluent. The projected future capacity of the Water Pollution Control Facility, which treats Woodland's wastewater, could serve up to 105,000 residents and is sufficient to serve growth under the Cumulative Scenario. The sewer system capacity in the Downtown area currently faces capacity constraints, but the City has plans to improve the system capacity with a new sewer line. In addition, Policy 5.F.1 of the 2035 General Plan ensures that sufficient public facilities and services will be available to serve new development. Therefore, the Cumulative Scenario makes a **less than cumulatively considerable contribution** to the potentially significant cumulative impact.

15. Solid Waste

Solid waste management is generally provided by the respective counties and not on a regional basis. Yolo County Central Landfill's disposal capacity is sufficient to absorb that increase, as well as projected increases from population growth in the rest of the County. Furthermore, the 2035 General Plan and 2035 CAP include policies to reduce solid waste disposal needs through encouraging the development of regional and community-based recycling facilities and secondary resource businesses, and through the promotion of waste reduction measures to Woodland residents and businesses. Therefore, the Cumulative Scenario makes a **less than cumulatively considerable contribution** to the less than significant cumulative impact.

VII. PROJECT ALTERNATIVES

When a lead agency has determined that, even with the adoption of all feasible mitigation measures, a proposed project would still cause one or more significant environmental effects that cannot be substantially lessened or avoided, the agency, prior to approving the project as mitigated, must first determine whether, with respect to such impacts, there remain any project alternatives that are both environmentally superior and feasible within the meaning of CEQA. An alternative may be "infeasible" if it fails to fully promote the lead agency's underlying goals and objectives with respect to the project.

When significant effects are identified in the EIR for the project, CEQA Guideline section 15126.6 requires the EIR to consider and discuss alternatives to the proposed actions as a way of avoiding the significant effects. Subdivision (a) states:

> An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate

> the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The Lead Agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.

Subdivision (b) states the purpose of the alternatives analysis is to discuss alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project, even if the alternatives would impede, to some degree, the attainment of the project objectives or if the alternative or alternative location would be more costly.

Subdivision (c) describes the selection process for a range of reasonable alternatives and states that the range must include those that could feasibly accomplish most of the project's basic objectives and could avoid or substantially lessen one or more of the significant effects. The EIR must briefly describe the rationale for selecting the alternatives and identify alternatives that were considered by the lead agency but rejected as infeasible and briefly explain the agency's reasons underlying that determination. Factors that may be used to eliminate alternatives from consideration include an alternative's failure to meet most of the basic project objectives, infeasibility, or the inability to avoid significant environmental effects. Thus, the range of alternatives is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to allow a reasoned choice. The EIR must include enough information about each alternative to allow meaningful evaluation, analysis, and comparison with the Project. Alternatives are limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine only the ones that the lead agency determines could feasibly attain most of the basic project objectives.

Under CEQA, "(f)easible means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors" (CEQA Guidelines Section 15364.) The concept of feasibility permits agency decision-makers to consider the extent to which an alternative is able to meet some or all of a project's objectives. In addition, the definition of feasibility encompasses desirability to the extent that an agency's determination of infeasibility represents a reasonable balancing of competing economic, environmental, social, and technological factors.

Section 15126.6(f) of the CEQA Guidelines provides a discussion of factors that can be taken into account in determining the feasibility of alternatives. These factors include:

- Project objectives;
- Avoid or substantially lessen significant effects;
- Site suitability;
- Other plans or regulatory limitations;
- Economic viability;
- Availability of infrastructure;
- Jurisdictional boundaries/regional context;
- Property ownership and control; and
- Other reasons for rejecting as infeasible (e.g., effects cannot be reasonably ascertained or implementation is remote and speculative).

In accordance with CEQA Guidelines Section 15126.6, a reasonable range of alternatives to the Proposed Project are described in Section 5 of the EIR and summarized below.

A. Proposed Project Objectives

1. 2035 General Plan

The Vision Statement and the Guiding Principles for the 2035 General Plan also serve as the objectives for it, as follows:

2035 General Plan Vision Statement:

> In 2035, Woodland is a highly desirable community to live, learn, work and recreate. It has maintained a small-town feel while maturing into an attractive, vibrant, and sustainable city that celebrates it architectural heritage and cultural diversity. Woodland is a healthy community with livable neighborhoods, a thriving downtown, well maintained infrastructure, excellent schools and recreational amenities connected by a seamless network of trails and paths.
>
> The city is the region's center of agricultural technology and food production and is recognized globally as a leader in sustainable agriculture. The community is prosperous and fiscally sound, offering abundant employment opportunities to its diverse and creative workforce.
>
> Woodland has become a destination for visitors seeking to experience its unique agricultural, historical, recreational, cultural and entertainment amenities.

2035 General Plan Guiding Principles:

- **Quality and Character:** Retain and enhance Woodland's quality of life, its distinctive identity and small-town characteristics.
- **Orderly Development:** Promote new growth while achieving an orderly pattern of community development, consistent with economic, social, fiscal and environmental needs.
- **Historic Downtown:** Strengthen the historic downtown district as the City's center of shopping, dining, entertainment and employment.
- **Economic Development:** Foster economic growth and diversification with a range of employment opportunities for all residents.
- **Mobility Options:** Coordinate land use and transportation planning to provide a range of attractive and viable transportation options, such as bicycle, pedestrian, and transit.
- **Housing Choice:** Provide a variety of housing types to meet the needs for all generations and income levels.
- **Agricultural Heritage:** Preserve and protect prime agricultural lands and their uses within and surrounding the community.

- **Safety:** Ensure that Woodland remains a safe place to live, protected from natural and manmade hazards.

- **Environmental Stewardship:** Foster a sustainable community for the next generation and protect and improve the quality of the natural environment.

- **Public Services:** Provide realistic, supportable and appropriate levels of public service that are sustainable and fiscally sound.

- **Health and Recreation:** Provide all residents with opportunities to live an active, healthy, and green lifestyle.

- **Quality Education:** Foster quality educational and enrichment opportunities.

2. 2035 CAP Objectives

The 2035 CAP is organized into six focus area, each of which includes overarching strategies to achieve each objective and implementation actions for each strategy. The 2035 CAP objectives are as follows:

- **Energy**:
  - Reduce Building Energy Use
  - Increase Renewable Energy Generation

- **Transportation and Land Use**:
  - Implement Land Use Policies to Support Reduced Motor Vehicle Use
  - Reduce Vehicle Trip Mileage and Equipment Idling Emissions
  - Replace Gas and Diesel Vehicles with Alternative-Fuel Vehicles

- **Urban Forest and Open Space**:
  - Increase Community Tree Canopy
  - Maintain and Enhance Open Space Environmental Values

- **Water and Solid Waste**:
  - Reduce Per Capita Water Demand
  - Achieve 75 percent Landfill Waste Diversion
  - Achieve 90 percent Landfill Methane Capture

- **Public Involvement**:
  - Build Community Engagement in CAP Implementation
  - Measure CAP Implementation Progress and Adjust Actions as Needed

- **Municipal Operations**:
  - Incorporate Sustainable Practices into All City Operations
  - Reduce Emissions from Municipal Electricity Use by 80 percent or More
  - Reduce Vehicle Fleet and Employee Commute Emissions

B. Alternatives Considered and Rejected

The City's process of developing and analyzing alternatives to the Proposed Project began with the Development Scenarios Analysis report in April 2015, which was a part of the City's general plan update process. The four different development scenarios set forth options to address the long-term physical growth and other community issues and priorities. The development scenarios analysis evaluated four development scenarios. Two of the scenarios eventually became the East Alternative and the South Alternative, which the EIR examined, and are explained more fully below.

The other two scenarios, Scenarios 1 and 3, were rejected as possible development scenarios. Scenario 1 considered development only on infill sites, primarily in the downtown area, along major existing transportation corridors, and in the Spring Lake Specific Plan Area. Scenario 1 would have provided for approximately 4,000 new housing units and 8,600 new jobs by 2035.

Scenario 3 considered a moderate amount of infill development, in addition to new development in SP-1A and SP-3. Scenario 3 would have provided for approximately 7,700 new housing units and 11,000 new jobs by 2035.

The City evaluated each of the four scenarios for impacts to transportation, utility capacity, odor exposure, and fiscal repercussions to the City. This analysis was provided to, and discussed by, members in attendance at a public workshop, the General Plan Steering Committee at three separate meetings, the Planning Commission at two meetings, and one City Council hearing. The City rejected Scenario 1 because it did not align with the City Council's growth objectives, and it would have resulted in the highest Vehicle Miles Traveled per capita. The City rejected Scenario 3 because a large portion of land in SP-3 would need to be reserved for a potential flood solution, leaving too little land available for development. This scenario also would have required moving an existing fire station and would have converted the most amount of Prime Farmland to urban uses. Thus, Scenarios 1 and 3 were incompatible with the City Council's objectives for future growth and development within the Planning Area.

C. Alternatives Analyzed in the EIR.

1. No Project Alternative: Buildout of the 2002 General Plan and Implementation of the Preliminary 2020 Climate action Plan

CEQA Guidelines Section 15126.6(e)(2) provides that an EIR's evaluation of alternatives must include a "no project" scenario, which is " . . . what is reasonably expected to occur in the foreseeable future if the [Proposed Project] were not approved, based on current plans and consistent with available infrastructure and community services." This alternative assumes that the 2035 General Plan and 2035 CAP would not be implemented and instead the City would build out as provided under the 2002 General Plan (as amended) and implement the Preliminary 2020 Climate Action Plan. The No Project Alternative plans for approximately 14,930 new residents, 5,420 new housing units, 5,545,000 new square feet of non-residential building space, and 8,170 new jobs. This alternative is considered to be feasible as it is currently in effect as the City's adopted general plan.

The No Project Alternative includes planned development also in the areas west of I-5 and north of Kentucky Avenue – including Rural Residential development in the western portion of the Planning Area, and Industrial, Business park, and Industrial development closer to I-5, as well as a small area identified for Highway Commercial development. Areas north of this planned development to the City's northern ULL are identified as Undesignated on the 2002 General Plan land use diagram. The No Project Alternative identifies a Planned Neighborhood in the areas west of CR 101 and south of the existing City limits. The Planned Neighborhood designation in the 2002 General Plan provides for detached and

attached single-family units, multi-family units, commercial uses, parks, open space, public and quasi-public uses under a future specific plan with an average density for residential areas not to exceed seven units per acre. The areas south of the Planned Neighborhood area to the City's southern ULL are Undesignated.

Of the non-residential square footage anticipated to develop under the No Project Alternative, 72 percent is anticipated to be located in infill locations. For residential development, the No Project Alternative anticipates that 60 percent of the new dwelling units would be located in infill settings. The No Project Alternative also assumes continued buildout of the Spring Lake Specific Plan Area.

The No Project Alternative also includes implementation of the Preliminary 2020 Climate Action Plan. The Preliminary 2020 Climate Action Plan is set to achieve emissions 15 percent below 2005 levels. This target is intended to approximate a return to 1990 emissions levels, consistent with the statewide target adopted in Assembly Bill 32. The Preliminary 2020 Climate Action Plan presents a set of community-generated strategies to guide the City of Woodland, its residents, and local businesses in GHG emissions consistent with state goals for 2020 addressing California's contributions to climate change.

Table 5-24 in the EIR sets forth a summary comparison of the environmental impacts associated with the No Project Alternative as compared to the other two alternatives analyzed in the EIR. That table concludes that the No Project Alternative would have a similar or lesser impact in almost all areas analyzed in the EIR except for (1) climate change, greenhouse gas emissions, and energy as the 2035 CAP would help reduce many of those impacts and (2) cultural resources.

2. East Alternative: Moderate Infill, SP-1A Development, SP-2 Development

Unlike other EIRs that analyze a project and different alternatives, this EIR analyzed the East Alternative and the South Alternative as "equal weight" alternatives, with the understanding that the City Council would select one of these two alternatives.

Development Scenario 2 became the East Alternative, which considered a moderate amount of infill development, new development in SP-1A (in the southern portion of the Planning Area) and new development in SP-2 (in the eastern portion of the Planning Area).

The City modified Scenario 2 to include the potential for new development in the northern portion of the Planning Area, in the vicinity of SP-3, where feasible. Development capacity assumptions were adjusted so that Scenario 2 would provide the same number of new dwelling units and approximately the same amount of nonresidential square footage as Scenario 4 (which became the South Alternative).

The East Alternative anticipated approximately 19,300 new residents, 7,000 new housing units, 17,386,000 new square feet of non-residential building space, and 19,340 new jobs. Of the non-residential square footage, 76 percent was anticipated to occur in infill locations under the East Alternative, particularly in the Downtown area (compared to 72 percent for the No Project Alternative and 80 percent for the South Alternative). For residential development, the East Alternative anticipated that 51 percent of the new dwelling units would occur in infill locations within existing City limits but not including the Spring Lake Specific Plan Area (compared to 60 percent for the No Project Alternative and 65 percent for the South Alternative). The East Alternative included the same amount of non-residential and residential development in the Spring Lake Specific Plan Area as the No Project Alternative and South Alternative.

Because the EIR provides an "equal weight" analysis of the East Alternative and the South Alternative, Chapter 4 of the EIR analyzes in detail the environmental effects of the East Alternative. Chapter 5 of the EIR sets forth in detail a comparison of the environmental impacts associated with the East Alternative as compared to the No Project Alternative and the South Alternative. The EIR concludes that the East Alternative would have a more significant effect on almost every impact as compared to the No Project Alternative. As compared to the No Project Alternative, the East Alternative would have a less significant effect on Climate Change, Greenhouse Gas, and Energy. The East Alternative would have the same effect on Hazardous Materials and Toxics, Public Services and Recreation, and Utilities as the No Project Alternative.

3. South Alternative: Moderate Infill, New Greenfield Growth in the South

The City modified the South Alternative from Development Scenario 4 to include potential for new development in the northern portion of the Planning Area, in the vicinity of SP-3, where feasible. Development capacity assumptions for the South Alternative were adjusted to provide the same number of new dwelling units and approximately the same amount of nonresidential square footage as theEast Alternative.

The EIR analyzed in detail the environmental effects of the South Alternative throughout Chapter 4 of the Draft EIR, along with the East Alternative, as the EIR is an "equal weight" analysis of two different alternatives, the East and the South. The South Alternative planned for approximately 19,300 new residents, 7,000 new housing units, 16,685,000 new square feet of non-residential building space, and 18,210 new jobs. Of the non-residential square footage, 80 percent was anticipated to occur in infill locations, with the majority occurring in the Downtown area and Corridors, under the South Alternative (compared to 72 percent for the No Project Alternative and 76 percent for the East Alternative). For residential development, the South Alternative anticipated that 51 percent of the new dwelling units would occur in infill settings, particularly in the Downtown area and Corridors,(compared to 65 percent for the No Project Alternative and 40 percent for the East Alternative). The South Alternative included same amount of non-residential and residential development in the Spring Lake Specific Plan Area as the No Project Alternative and East Alternative.

The EIR concluded that the South Alternative would have a more significant effect on seven impacts (aesthetics, agriculture, air quality, geology, land use, noise and vibration, and transportation and traffic) than the No Project Alternative and would have a more significant effect on one impact (Agriculture) as compared to the East Alternative.

D. Environmentally Superior Alternative

The No Project Alternative is environmentally superior since it would have fewer impacts in the greatest number of environmental impact areas. In many instances, the No Project Alternative would have fewer impacts compared to the East and South Alternatives because the No Project Alternative would result in less overall development, including residential and non-residential square footage, employment, and total population. Thus, despite the fact that the Proposed Project includes policies that will result in more efficient development, community design approaches that may help to reduce environmental effects, or other benefits, including implementation of the 2035 Climate Action Plan, the total amount of development would still increase the level of environmental impact for many topic areas compared to the Proposed Project.

When the No Project Alternative is environmentally superior, CEQA Guidelines Section 15126.6(c) requires that another alternative be identified. Generally, CEQA requires lead agencies to adopt the environmentally superior alternative instead of the proposed project unless the lead agency finds a basis for rejecting the alternative. CEQA allows the lead agency to reject an alternative if the alternative is not environmentally superior to the proposed project, including its mitigation measures, if the alternative fails to meet most of the basic project objectives, or if the alternative is infeasible for legal, economic, social, or other reasons.

In this case, the next most environmentally superior Alternative is the South Alternative of the Proposed Project, since it would reduce impacts in eight impact areas compared to two for the East Alternative of the Proposed Project. The South Alternative would have fewer impacts compared to the East Alternative for air quality, biological resources, cultural resources, hydrology, flooding, and water quality; and land use planning, population, and housing. The South Alternative would have fewer impacts compared to the No Project Alternative for cultural resources, as well.

Since the South Alternative would involve a reduced amount of area of land disturbance, the emissions during trenching, grading, and site preparation would be slightly less than the East Alternative. Under the East Alternative, a greater amount of habitat loss would occur than under the South Alternative or the No Project Alternative because greater acreage of planned growth would occur in areas that are currently undeveloped and provide habitat that could help to support special-status species. Each of the Alternatives would involve ground-disturbing construction in areas where the City anticipates infill development will happen during the planning horizon, as well as in the Specific Plan Areas. Overall, the South Alternative would have the least land area potentially subject to disturbance, relative to the No Project Alternative and the East Alternative. Thus, there is less potential to encounter archaeological and historic architectural resources that could be damaged or destroyed. Implementation of any alternative could expose people or structures to significant risks due to flooding, including flooding as a result of the failure of a levee or dam. The impact would be significant and unavoidable for any alternative, with greater areas of risk for the East Alternative due to the fact that it permits development in the SP-2 area. Housing and employment growth related to the East and South Alternatives exceeds the forecast included in SACOG's current MTP/SCS. This could be considered a growth-inducing impact if the City is successful in attracting more development than forecast by SACOG and if this, in turn, results in less overall development locating in other parts of the region. The East Alternative assumes a total population of approximately 19,300 people, 7,000 dwelling units, 19,340 local jobs, and 17.4 million square feet of nonresidential development. Therefore, the East Alternative is projected to generate the same population and housing growth but more employment than the South Alternative and more population and employment growth than the No Project Alternative.

However, as explained below, even though the South Alternative is the environmentally superior alternative (other than the No Project Alternative) the City Council has chosen not to select either the East Alternative or the South Alternative as its preferred development scenario and instead is adopting a modified growth strategy that does not select a particular growth direction.

E. Findings for Project Alternatives

1. Rejection of No Project Alternative

The City Council specifically rejects the No Project Alternative on the ground that the No Project Alternative does not meet the Proposed Project's objectives. The No Project Alternative would result in less overall development, including residential and non-residential square footage, employment, and total

population. The No Project Alternative would not include policies that result in more efficient development; community design approaches that may help to reduce environmental effects; or other benefits, including implementation of the 2035 CAP. While the No Project Alternative could reduce impacts related to greenhouse gas emissions and energy, cultural resources, and paleontological resources, the No Project Alternative would not avoid significant and unavoidable impacts related to aesthetics, agricultural resources, air quality, and noise.

The Final 2035 General Plan requires the maintenance of LOS D or better in most places. The Final General Plan also includes a requirement to develop a transportation demand management ordinance, includes policies on Complete Streets (that promote travel by all modes), and includes a policy to reduce the amount of land devoted to parking. The No Project Alternative would not promote the City's Project Objective related to Mobility Options to the same extent as would the Final 2035 General Plan and CAP. This Objective indicates that the City will "[c]oordinate land use and transportation planning to provide a range of attractive and viable transportation options, such as bicycle, pedestrian, and transit." The change from LOS C to D better promotes the City's Objective related to Public Services, which indicates that the City will "[p]rovide realistic, supportable and appropriate levels of public service that are sustainable and fiscally sound" both in relation to capital costs, as well as ongoing maintenance costs of roadways.

Unlike the No Project Alternative, the Final 2035 General Plan and CAP includes new policies that address fiscal sustainability, strong partnerships with entities such as University of California at Davis, and the provision of infrastructure to support new growth. The No Project Alternative would not promote the City's Project Objective related to Economic Development to the same degree as would the Final 2035 General Plan and CAP. This Objective indicates that the City will "[f]oster economic growth and diversification with a range of employment opportunities for all residents."

Compared to the No Project Alternative, the Final 2035 General Plan and CAP include new policies that are more specific to certain resources and environmental concerns. The 2035 General Plan includes policies specific to the protection of agricultural land and mineral and cultural resources. While the No Project Alternative does not, the Final 2035 General Plan and CAP includes a policy on the Surface Water Project. The Final 2035 General Plan and CAP explicitly addresses GHG emissions and climate change with respect to the latest State legislation. These differences mean that the No Project Alternative is not as effective in promoting the City's Project Objective related to Environmental Stewardship, which indicates that the City will "[f]oster a sustainable community for the next generation and protect and improve the quality of the natural environment."

Compared to the No Project Alternative, the Final 2035 General Plan and CAP include more detail related to development in flood hazard zones. The No Project Alternative is not as effective in promoting the City's Project Objective related to Safety, which indicates that the City will "[e]nsure that Woodland remains a safe place to live, protected from natural and manmade hazards."

In order to better balance between environmental noise and other planning objectives, including economic development and infill development in particular, noise policies have been revised under the Final 2035 General Plan and CAP. These changes promote the City's Objectives related to the Historic Downtown and Economic Development, which indicate that the City will "[s]trengthen the historic downtown district as the City's center of shopping, dining, entertainment and employment" and "[f]oster economic growth and diversification with a range of employment opportunities for all residents," including in infill locations, such as downtown.

2. Rejection of the East and South Alternatives

The City Council held three public hearings on the 2035 General Plan and 2035 CAP prior to adopting the Proposed Project. During those hearings, the City Council considered whether to select either the East Alternative or the South Alternative and ultimately decided to adopt a different growth strategy. That strategy continues to prioritize future residential growth through infill along key corridors and Downtown and continues to prioritize Spring Lake buildout. The City Council recognizes the potential benefits of development in new growth areas (including SP-1, SP-2, and SP-3) and desires to not preclude consideration of development in any of the growth areas through selection of either the south or east alternative. Instead, the City Council recognizes that inherent physical, financial, and market constraints exist that will naturally direct and meter growth in these areas. Various growth phasing considerations are imbedded as policy considerations rather than as regulatory "restrictions." Decisions on future development in new growth areas will rely on a thorough assessment of the specific project proposal and its consistency with the 2035 General Plan Goals and Policies, 2035 Climate Action Plan, as well as the Final EIR.

As discussed above in Section VI.A, the City made various changes to the 2035 General Plan in order to accomplish this change to the growth strategy, but none of these changes required revisions to the EIR as they did not change the environmental effects of the Proposed Project.

Based on impacts identified in the EIR, and other reasons documented in these Findings and below in the Statement of Overriding Considerations, the City Council finds that adoption and implementation of the Final 2035 General Plan and Final 2035 CAP is the most desirable, feasible, and appropriate action and rejects the other alternatives as infeasible based on consideration of the relevant factors identified herein.

Additionally, none of the alternatives achieves the same the City's objectives and community values to the same degree as the Final 2035 General Plan and 2035 CAP. The East Alternative and South Alternative would achieve some of the Project Objectives, but not to the same degree as would the Final 2035 General Plan and 2035 CAP. Based on the information in the EIR, comments received on the Public Review Draft General Plan, and professional expertise, the City team has identified proposed changes to the Public Review Draft General Plan in the form of clarifications, corrections, and modifications.

The Final 2035 General Plan provides greater flexibility compared to both the East and South Alternatives unknown future market conditions and will allow for an independent review of appropriate constraints on development based on actual conditions at the time opportunities/applications emerge. The Final 2035 General Plan provides the desired flexibility in terms of location of growth while continuing to guide the location, timing, and character of future development through the General Plan's policies. Compared to the East and South Alternatives, the Final 2035 General Plan and CAP is better able to achieve the City's Objective related to Economic Development, which indicates the City will "[f]oster economic growth and diversification with a range of employment opportunities for all residents.

As a part of revisions to the Final 2035 General Plan and 2035 CAP, the City modified Policy 2.B.1 to clearly provide protections for completion of infrastructure and amenities in existing specific plan areas while they are developing. Compared to the East and South Alternatives, the Final 2035 General Plan and 2035 CAP are better able to achieve the City's Objectives related to Mobility Options, Public Services, and Health and Recreation, as follows:

- Mobility Options: Coordinate land use and transportation planning to provide a range of attractive and viable transportation options, such as bicycle, pedestrian, and transit.

- Public Services: Provide realistic, supportable and appropriate levels of public service that are sustainable and fiscally sound.
- Health and Recreation: Provide all residents with opportunities to live an active, healthy, and green lifestyle. Promote healthy lifestyles by enhancing opportunities for physical activity, healthy eating and sustainable living. The General Plan ensures that adequate parks and recreational amenities are well integrated in new neighborhoods. The Plan promotes creation of a recreational greenbelt and expansion of walking and biking paths to enable residents to use active transportation options to connect to work, schools, grocery stores, and variety of open spaces.

With the modified growth strategy, the City will be able to evaluate new development proposals as they are submitted and to determine whether they meet the above policies, as well as all of the 2035 General Plan policies, to ensure that growth occurs in an orderly and logical manner. The City will analyze each new development project for its impacts and will compare it to the Proposed Project and the EIR for the Proposed Project. In this manner, the City Council determines that it will be able to grow in a manner that is more thoughtful than had it selected one of the two alternatives.

As a part of the revisions to the Final 2035 General Plan and 2035 CAP, Policy 2.B.2 was modified to be consistent with State law related to flood protection but to also clarify that advance processing in areas subject to flood risk is not allowed. Policy 2.B.2 now states that no specific plan for SP-1, SP-2, or SP-3 may be processed until the designs for projects to provide necessary 200-year flood protection have been approved and the funding for construction has been secured. The City Council also modified the policy to require a 4/5 vote prior to the City's agreement to purchase the 900-acre property within SP-2. Compared to the East and South Alternatives, the Final 2035 General Plan and 2035 CAP is better able to achieve the City's Objectives related to Safety, which indicates the City will, "[e]nsure that Woodland remains a safe place to live, protected from natural and manmade hazards."

The City has also modified Policy 2.L.1 to clarify that plans to develop new Specific Plan areas will be independently analyzed for consistency with the 2035 General Plan and to consider site-specific constraints. This policy modification will similarly ensure that the City grows in a logical and orderly manner with a recognition of specific limitations and will not necessarily tie growth to a particular location with the City.

Additionally, the City modified General Plan Policy 2.A.3 to clarify that the farmland identified for preservation must be of the same quality as the farmland that is impacted. With these revisions, the Final 2035 General Plan and CAP would be better able to achieve the City's Objectives related to Agricultural Heritage and Environmental Stewardship, which indicate the City will, "[p]reserve and protect prime agricultural lands and their uses within and surrounding the community," and, "[f]oster a sustainable community for the next generation and protect and improve the quality of the natural environment."

The City also modified 2035 General Plan Policy 3.A.4 to require new development projects to achieve a 10 percent reduction in VMT per capita or service population compared to General Plan 2035 VMT performance or baseline conditions. Compared to the East and South Alternatives, the Final 2035 General Plan and CAP is better able to achieve the City's Objectives related to Mobility and Environmental Stewardship, which indicate the City will, "[c]oordinate land use and transportation planning to provide a range of attractive and viable transportation options, such as bicycle, pedestrian, and transit," and "[f]oster a sustainable community for the next generation and protect and improve the quality of the natural environment."

The City also made other modifications to the 2035 General Plan in the Economic Development Element, the Public Facilities and Services Element, the Healthy Community Element, the Sustainability, Conservation, and Open Space Element, the Safety Element, and the Draft CAP to create the Final 2035 General Plan and CAP. These clarifications, corrections, and modifications are all set forth in Attachment A to the City Council's resolution approving the 2035 General Plan and overall represent a more desirable and therefore feasible Final 2035 General Plan.

The City Council may reject an alternative that it considers undesirable from a policy standpoint, provided that such a decision reflects a reasonable balancing of various "economic, social, and other factors." Based on impacts identified in the EIR and throughout this findings document, the City Council finds that adoption and implementation of the Final 2035 General Plan and CAP as approved, is the most desirable, feasible, and appropriate General Plan and CAP, and rejects other alternatives and other combinations and/or variations of alternatives as infeasible.

VIII. STATEMENT OF OVERRIDING CONSIDERATIONS

As set forth in the preceding sections, the City of Woodland City Council's approval of the Final 2035 General Plan and 2035 CAP will result in significant adverse environmental effects that cannot be avoided even with the adoption of all feasible mitigation measures, and there are no feasible project alternatives which would mitigate or substantially lessen the impacts. Despite the occurrence of these effects, however, the City Council chooses to approve the Final 2035 General Plan and 2035 CAP because the economic, social, and other benefits that the Final 2035 General Plan and CAP will produce will render the significant effects acceptable.

Pursuant to CEQA Section 21081(b) and Guidelines Section 15093, the City of Woodland has balanced the benefits of the Proposed Project against the unavoidable adverse impacts associated with the Proposed Project and has included all feasible mitigation measures in the EIR. The City has also examined alternatives to the Proposed Project and determined and adoption and implementation of the Proposed Project is the most desirable, feasible, and appropriate action.

The City Council determines that the EIR identified and discussed significant effects that may occur as a result of the Proposed Project. By implementing the EIR mitigation measures, as adopted by this Resolution, these effects can be mitigated to a level of less than significant except for the unavoidable significant impacts discussed below. The City Council finds that it has made a reasonable and good faith effort to eliminate or substantially mitigate the potential impacts resulting from the Proposed Project. The City Council also finds that except for the Proposed Project, all other alternatives set forth in the EIR are infeasible because they would prohibit the realization of the Proposed Project's objectives and/or specific economic, social, or other benefits that the City Council finds outweigh any environmental benefits of the alternatives.

In making this Statement of Overriding Considerations in support of the findings of fact and the Proposed Project, the City Council finds that the environmental effects of the Proposed Project have been reduced to the extent feasible b the mitigation measures, that it has considered the information contained in the Final EIR, as well as the public testimony and record in proceedings in which the Final 2035 General Plan and CAP were considered, and that the benefits of the Proposed Project, as discussed further below, outweigh the potential unavoidable adverse impacts and render those potential adverse potential environmental impacts acceptable based upon the City Council's overriding considerations.

A. Significant and Unavoidable Impacts

Based on the information and analysis set forth in the EIR and reiterated in Section VI.B.3 of these Findings, implementation of the Proposed Project would result in the following significant and unavoidable impacts, even with the implementation of all feasible mitigation:

Aesthetics and Visual Resources

4.1-3: Substantially Degrade the Existing Visual Character or Quality of the Site and its Surroundings.

4.1-4: Create a New Source of Substantial Light or Glare Which Would Adversely Affect Day or Nighttime Views in the Area.

Agricultural and Forestry Resources

4.2-1: Convert Prime Farmland, Unique Farmland, or 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 Use.

4.2-3: Involve Other Changes in the Existing Environment that, Due to Their Location or Nature, Could Result in Conversion of Farmland, to Non-Agricultural Use.

Air Quality

4.3-1: Generation of Short-Term Construction-Related Emissions of Criteria Air Pollutants and Precursors.

4.3-2: Generation of Long-Term Operational Emissions of Criteria Air Pollutants and Precursors.

4.3-3: Expose Sensitive Receptors to Substantial Pollutant Concentrations.

Cultural Resources

4.6-1: Cause a Substantial Adverse Change in the Significance of Archaeological or Historical Resources as defined in CEQA Guidelines Section 15064.5.

4.6-2: Disturb Human Remains, including those Interred Outside of Formal Cemeteries.

Hydrology, Flooding, and Water Quality

4.9-7: Expose People or Structures to a Significant Risk of Loss, Injury or Death Involving Flooding, Including Flooding as a Result of the Failure of a Levee or Dam.

Land Use Planning, Population, and Housing

4.10-3: Impacts Related to Inducing Population Growth.

Noise and Vibration

4.11-1: Exposure of Noise-Sensitive Land Uses to Short-Term (Construction).

4.11-2: Exposure to or Generation of Long-Term Noise Levels.

4.11-3: Exposure to or Generation of Vibration.

Cumulative Impacts

The Cumulative Scenario of the Final 2035 General Plan and CAP, taken together with other past, present, and probable future projects producing related impacts, would have a significant impact in the following areas:

- **Aesthetics:** Changes in visual character and increased light and glare in the Planning Area and region.
- **Agricultural and Forestry Resources:** Permanent loss of agricultural land in the Planning Area and region.
- **Air Quality:** Increased generation of construction-related and operational criteria air pollutants and precursor emissions that exceed Yolo-Solano Air Quality Management District's thresholds of significance.
- **Cultural Resources:** Potential damage or destruction of undiscovered cultural resources.
- **Hydrology, Flooding, and Water Quality:** Potential flooding from development in dam inundation areas.
- **Land Use Planning, Population, and Housing:** Increase in population, housing, and employment that could attract additional residential development to the Planning Area and region.
- **Noise:** Increase in noise exposure for noise-sensitive land uses associated with increases in traffic in the Planning Area and region.
- **Water Supply and Infrastructure:** Increase in water demand that may exceed supply.

B. Benefits of the Proposed Project/ Statement of Overriding Considerations

The City of Woodland has independently reviewed the information in the EIR and the record of proceedings, made a reasonable and good faith effort to eliminate or substantially lessen the impacts resulting from the Proposed Project to the extent feasible by including policies and actions in the General Plan that effectively mitigate potential environmental impacts to the greatest extent feasible, and balanced the Proposed Project's benefits against its significant unavoidable impacts.

In the judgment of the City Council, the Proposed Project and its general benefits, set forth in Section IV. outweigh its unavoidable significant effects. It is the position of the City Council that any one of these reasons is sufficient to justify approval of the Proposed Project. Thus, even if a court were to conclude that not every reason is supported by substantial evidence, the City Council would stand by its determination that each individual reason is sufficient. The substantial evidence supporting the various benefits can be found in the preceding findings, which are incorporated by reference into this section, and in the documents found in the Record of Proceedings, as defined in Section V, (Record of Proceedings). The City Council finds that adoption and implementation of the Proposed Project would provide

economic, social, legal, and other considerable benefits. The following statement identifies the reasons why this is the case:

1. The 2035 General Plan promotes environmentally-sustainable development through goals and policies that integrate the 2035 Climate Action Plan and balance the need for adequate infrastructure, housing, and economic vitality with the need for resource management, agricultural preservation, environmental protection, and preservation of quality of life for City of Woodland residents.

2. The 2035 General Plan ensures the long-term productivity and viability of the City's economic base as well as preserves and protects prime agricultural land and their uses within and surrounding the City.

3. The 2035 General Plan land use map accounts for existing development, physical constraints, agricultural preservation, economic development, hazards, and incompatible uses in accordance with the voter-adopted Urban Limit Line and assigns densities and use types accordingly to enhance the safety, livability, and economic vitality of the City of Woodland.

4. The 2035 General Plan permits growth in existing and new areas of the City while retaining and enhancing the City's small town characteristics as well as providing all City residents with opportunities to live an active, healthy, and green lifestyle.

5. The 2035 General Plan and 2035 Climate Action Plan together outline a strategy to reduce greenhouse gas emissions within and from the City of Woodland so that the City can grow responsibly while also conserving energy, water, and other resources and promote net-zero energy development.

6. The 2035 Climate Action Plan provides GHG reduction targets for 2020 and 2035 that allow the City to demonstrate consistency with the State of California's long-term GHG reduction targets, as set forth in AB 32 and SB 32 and outlines actions that are appropriate for the City.

7. The City of Woodland is legally required to update its General Plan pursuant to Government Code section 65302(b).

IX. CONCLUSION

The City prepared the Final EIR pursuant to CEQA and the CEQA Guidelines. The City Council has independently determined that the Final EIR fully and adequately addresses the impacts, mitigating policies and implementation programs, and implementation of goals, policies, and programs, and build-out of the Final 2035 General Plan and Climate Action Plan (CAP) The alternatives identified and considered in the Final EIR meet the test of "reasonable" analysis, and this consideration provides the City Council with important information from which to make an informed decision. Both the Planning Commission and City Council held public hearings. Substantial evidence in the record from those meetings and other sources demonstrates various benefits and considerations including economic, legal, social, technological, and other benefits that the City would achieve from the implementation of the Final 2035 General Plan and CAP. The City Council has balanced these project benefits and considerations against the significant and unavoidable environmental impacts that would result from the Proposed Project

and has concluded that those impacts are outweighed by the Final 2035 General Plan and CAP benefits. Upon balancing the environmental risk and countervailing Final 2035 General Plan and CAP benefits, the City Council has concluded that the benefits that the City will derive from the implementation of the project outweigh those environmental risks. The City Council hereby determines that the above-described Final 2035 General Plan and CAP benefits override the significant and unavoidable environmental impacts of the Proposed Project.

In sum, the City Council finds that any residual or remaining effects on the environment resulting from adoption and implementation of the Final 2035 General Plan and 2035 CAP are acceptable due to the benefits set forth in this Statement of Overriding Considerations.