



CITY OF FAIRFIELD

Founded 1856

Incorporated December 12, 1903

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February 25, 2010

HAND-DELIVERED

Matt Walsh
Solano County Department of Resource Management
Planning Services Division
675 Texas Street, Suite 5500
Fairfield, CA 94533

Re: Green Valley Specific Plan Draft Environmental Impact Report

Dear Mr. Walsh:

The City of Fairfield has reviewed the Draft EIR for the Green Valley Specific Plan. Thank you for the opportunity to review and comment upon this project.

One overall comment is that many specific mitigation measures and programs are deferred to the subdivision map phase. As some of these impacts are cumulative or should be addressed at the project level, we are concerned that the County acknowledge this issue and develop a mechanism to clearly address these overall project and cumulative impacts.

11.01

Attached, please find our specific comments on issues that potentially impact the City of Fairfield. Please feel free to call Brian Miller or myself at 707-428-7461 if you have any questions.

Sincerely,

ERIN L. BEAVERS
Director of Community Development

ELB:BKM:ccs

c: Fred Beiner, Tom Martian, George Hicks, Garland Wong, Brian Miller

City of Fairfield Comments: Green Valley Specific Plan EIR

Parks, Open Space and Conservation Issues (Including Biological Species of Concern)

1. Adding 400 homes to the valley floor will increase the patronage within Rockville Hills Regional Park. With only two sanctioned entrances to the park and this development sitting between them, there may be an increase of residents entering Rockville Hills Regional Park via unauthorized access points. To deal with this, City staff suggests the EIR note the expected use pattern and mitigate these impacts.

11.02

The plan shows no connections to the park via Green Valley Road. While much of the frontage along the east side of Green Valley Road has been developed with estate residential development (De Leu Drive, Vintage Lane), there may be opportunities at the southern end of the study area to develop an alternative entrance to Rockville Hills Park. We suggest as a mitigation measure the EIR include working with the City and stakeholders to study the appropriateness of a mid Green Valley entrance to Rockville Hills Regional Park for vehicles, bicyclists and pedestrians as part of the Project. Note that the creation of a park entrance on this side of the park was not envisioned in the Rockville Hills Park Management Plan adopted in 2002 and that the City Council would need to vet this management plan modification. Any new park entrance off Green Valley Road should include a safe pedestrian/bicycle crossing to carry pedestrians and cyclists from the core development areas west of Green Valley Road to the new park entrance.

2. While there is shoulder striping along most of Rockville Road, there are no actual bicycle lanes. Staff suggests the County formalize the bicycle lanes along Rockville Road between Green Valley Road and the park.

11.03

Drainage

1. Stream sedimentation: Sediment transport and deposition is a serious on-going issue in Hennessy and Green Valley Creeks. Project mitigation should include developing a detailed and specific plan for detention, sediment control basins, and velocity control/energy dissipation structures in the stream channels and at outlets to mitigate the generation and transport of silts by and through the project.

11.04

Traffic

A traffic study has been done as a part of the DRAFT EIR. The traffic study acknowledges impacts at several offsite intersections, many of which present either existing or near term Level of Service Problems. The DRAFT EIR acknowledges the impacts and suggests that future regional transportation projects, including the North Connector (planned reliever road north of I-80 between Abernathy Road and Highway

11.05

12), future improvements to the I-80/680 interchange, and future upgrades to existing I-80 interchanges at Abernathy Road, Pittman/Suisun Valley Road and Green Valley/Lopes Road, will mitigate many of these impacts. Specific comments include:

1. There are several references to "VTA" throughout the document. Please correct to reference "STA." 11.06
2. Green Valley Road/Westlake: A significant number of additional trips (nearly doubling existing volumes along northbound and southbound Green Valley Road) results in a potentially significant delay for Westlake Drive traffic. The proposed project will result in significant vehicle delay during the peak PM period. The significant impacts to this intersection are not unavoidable as concluded in the DEIR. The installation of a traffic signal as part of the proposed project would mitigate these impacts to less than significant and should be installed prior to the issuance of the appropriate building permit trigger which would result in the intersection dropping below the City Standard of LOS "D". 11.07
3. The DRAFT EIR acknowledges the need for the developer to participate on a pro-rata fair share basis in mitigating the project's impacts on local roads and intersections, but the level of that participation is not clear. Mitigation measures should include an AB 1600 cost sharing program. 11.08
4. The reference to the intersection of Green Valley Road and Business Center Drive discusses free southbound and northbound right turns on Green Valley Road. The "free" is interpreted as the inclusion of a pork chop island and relocation of signal gear/hardware. Due to biological impacts and lack of right-of-way, this configuration is not practical. The City suggests the construction of northbound and southbound right turn pockets as potential substitute mitigation. 11.09
5. The proposed project will approximately double the traffic volume on Green Valley Road north of Eastridge Drive and develop property adjacent to this roadway. As part of the initial phase of development of the proposed project, the section of Green Valley Road north of Eastridge Drive that was annexed to the City of Fairfield (approximately 1,800 feet) should be de-annexed and maintained by the County as a rural road, or reconstructed to City of Fairfield arterial street standards as part of the development of the project. 11.10

11. Erin L. Beavers, Director of Community Development, Planning Division, Community Development Department, City of Fairfield; January 25, 2010

- 11.01 General Comment on DEIR Adequacy--deferral--many specific mitigation measures and programs are deferred to subdivision map phase; because many of the plan impacts are cumulative and should be addressed at the project-level, County should acknowledge this issue and develop mechanism to clearly address these overall project and cumulative impacts.

Response: See Master Response C.

- 11.02 Public Services and Utilities--Parks and Recreation--Rockville Hills Regional Park--possible increase in residents using unauthorized access points; EIR should note expected use pattern and mitigate; may be opportunities at southern end of study area to develop alternative entrance to Rockville Hills Park; suggested mitigation: work with City and stakeholders to study appropriateness of a new park entrance off Green Valley Road--mid-Green Valley entrance to Rockville Hills Park for vehicles, bicyclists and pedestrians.

Response: Comment acknowledged. No trail connection to Rockville Hills Park is proposed.

- 11.03 Public Services and Utilities--Parks and Recreation--Rockville Hills Regional Park--bicycle lanes--City suggests that County should formalize bicycle lanes along Rockville Road between Green Valley Road and the Park (no actual bicycle lanes now).

Response: Rockville Road is not within the Specific Plan boundary. No trail connection to Rockville Hills Park is proposed.

- 11.04 Hydrology and Water Quality--stream sedimentation concern--serious ongoing issue in Hennessy and Green Valley creeks--mitigation should include developing detailed and specific plan for detention, sediment control basins, and velocity control/energy dissipation structures in the stream channels and at outlets to mitigate the generation and transport silts by and through project.

Response: The Water Quality setting description on DEIR p. 11-6 explains that, pursuant to the federal Clean Water Act, the quality of storm water runoff discharging into plan area creeks is governed by the *National Pollution Discharge Elimination System* (NPDES). NPDES permits are required in Solano County for construction projects disturbing more than one acre of soil, animal feedlots, and agricultural activities above certain thresholds. Increased agricultural activities facilitated by the Specific Plan would be subject to these existing permit requirements. Permit issuance requires preparation of a storm water pollution prevention plan (SWPP), an operational plan that identifies and describes best management practices (BMPs) to be implemented by the NPDES permit holder. In response to this comment, Impact and Mitigation 11-2 pertaining to ongoing project impacts on water quality have been revised to add specific reference to the potential for plan-related increases in soil disturbance, erosion and sedimentation in surface water due to expanded and new agricultural activities, and the associated need to mitigate this potential impact through compliance with related requirements set forth in the County Storm Water Management Plan and NPDES permit issuance process, including implementation of

erosion and sedimentation control measures and best management practices for farming activities.

- 11.05 Transportation and Circulation--DEIR suggests that future regional transportation project (examples cited in comment) will mitigate many of the DEIR-identified impacts.

Response: The EIR authors concur with this comment. Consistent with this comment, the DEIR indicates in section 17.1.3 on DEIR p. 17-14, and under Mitigation 17-1 on DEIR p. 17-27, that future implementation of the planned interjurisdictional I-80/I-680/SR 12 Interchange Project would serve to mitigate the baseline and baseline-plus-project impacts on three of the DEIR "study intersections." The EIR authors believe that the DEIR includes an adequate mitigation discussion for all identified significant transportation and circulation impacts.

- 11.06 Transportation and Circulation--change all "VTA" references to "STA."

Response: The suggested corrections have been made to DEIR p. 17-6. See the revised version of DEIR p. 17-6 in section 3, Revisions to the Draft EIR, herein.

- 11.07 Transportation and Circulation--Mitigation 17-1(1)--Green Valley Road/Westlake Drive intersection--significant impact to this intersection is not unavoidable--traffic signal as part of project would mitigate impacts to a less than significant level and should be installed prior to issuance of appropriate building permit trigger; would result in intersection dropping below City standard of LOS D.

Response: The EIR has been changed to include a fair share contribution to a future traffic signal. Please see revised version of Mitigation 17-1 in section 3, Revisions to the Draft EIR, herein.

- 11.08 Transportation and Circulation--fair share mitigation responsibilities--DEIR acknowledges need for developer fair share participation in mitigating project impacts on local roadway system, but level of participation is unclear; mitigation should include an AB 1600 cost sharing program.

Response: Please see revised version of Mitigation 17-1 in section 3, Revisions to the Draft EIR, herein. The AB 1600 level of cost sharing detail is typically established at the "second tier" subdivision map approval level.

- 11.09 Transportation and Circulation--Green Valley Rd./Business Center Dr. intersection--DEIR-proposed mitigation configuration not practical (biological and right-of-way constraints). City suggests construction of northbound and southbound right-turn pockets as substitute mitigation.

Response: The intent of Mitigation 17-1 language for the Green Valley Rd./Business Center Dr. intersection is to incorporate improvement plans that the EIR authors understood were currently being advocated by the City for anticipated impacts at this intersection with or without the project. The ultimate ("second tier") mitigation program developed by the City for this intersection would be applicable.

- 11.10 Transportation and Circulation--Green Valley Rd. section north of Eastridge Dr.--project will approx. double traffic volume on this segments and develop property next

to roadway--as part of initial development phase, segment that was annexed to City (approx. 1,800 feet) should be de-annexed and maintained by County as rural road, or reconstructed by City to arterial standards as part of project development.

Response: Such mitigation details would be appropriately finalized at the "second-tier" individual development application phase. See Master Responses B and C.

RECEIVED

FEB 25 2010

COUNTY OF SOLANO
RESOURCE MANAGEMENT

Larry Burch, P.E.
6 Spring Lane
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(707) 864-1489

February 25, 2010

Solano County Resource Management Department
675 Texas St., Ste. 5500
Fairfield, CA 94533

Attn: Matt Walsh

From: Larry Burch 
Cc: GVLA Directors
Supervisor Linda Seifert

Subject: Middle Green Valley Draft Environmental Impact Report

I am a resident of Green Valley and am interested in following the progress in the County adoption of the Middle Green Valley Specific Plan. I have reviewed a copy of the Draft Environmental Impact Report. This letter summarizes my questions and comments, and identifies clarifications and corrections that I am suggesting for the final EIR.

The Development Agreement will define and assign the various responsibilities of the County, Landowners, the proposed Green Valley Conservancy and affiliated entities that will be instrumental in the effective implementation of the policies and activities in the MGV Specific Plan and the accomplishment of the mitigations named in the EIR. It would have been good to have the Development Agreement available when reviewing the EIR and the Revised Draft Specific Plan. I have two overarching concerns with the Specific Plan and the EIR:

12.01

a. The County Planning Commission and the Board of Supervisors should maintain firm control of the planning activities within the MGV area. It is appropriate for the Conservancy to be the steward of the Plan implementation, but there should be an easy manner for the Commission or the Supervisors to review and take the necessary measures if the Conservancy is unable to effectively implement the Plan or if extreme community concerns develop.

12.02

b. The DEIR leads the reader to the impression that not much will be done in implementing the mitigations until the Conservancy is formed, and that won't occur until the first site plan is filed. How can the County implement some of the mitigations if the Conservancy is not formed until the first plan is filed? There should be some preliminary discussion between the Developers and the Conservancy to provide efficiency of the application generation process. Hence the formation steps of the Conservancy and the Design Review Committee should

12.03

start soon after approval of the MGV Specific Plan. My comment No. 3 below provides more details on this concern.

The following are my specific questions and comments on the DEIR:

1. **DEIR Pg ES-3 – “(4) Required Approvals.** Implementation of the proposed Specific Plan would require County approval of the Specific Plan and associated County General Plan and Zoning Map amendments to incorporate the Specific Plan. Implementation of the Specific Plan would also require County establishment of the County Services Area (CSA) to maintain and operate plan area water, sewer, storm drainage, recycled water, and parks and recreation infrastructure; and County approval of a Master Development Agreement with plan area property owners.”

Q: Shouldn't this section also indicate that the Specific Plan must incorporate the mitigation measures recommended in the EIR?

12.04

2. **DEIR Pg ES-4 – “Note:** Where the entity responsible for implementing a mitigation measure is identified under "Mitigation Responsibility" in Table ES-1 as "County," all or part of the **ultimate responsibility for carrying out the measure may be extended** by the County to individual applicant/developers as a condition of County approval--e.g., as a condition of Development Agreement, subdivision, and/or other project-specific approval.”

Q: Shouldn't some distinction be made in those table entries where the County is listed, by indicating the Conservancy, the Design Review Committee, or the CSA would need to take the action, or where the action would involve the Development Agreement?

12.05

3. **DEIR Table ES-1 – Mitigation 3-1:** “Prior to County approval of any future plan area subdivision or other discretionary development application, the project applicant/developer shall provide site plan, architectural, landscape and infrastructure design details demonstrating to the satisfaction of the Middle Green Valley Conservancy Design Review Committee, County staff and County Planning Commission that the development design:”

Q: The DEIR proposes many mitigation measures to reduce the potential impacts of the MGV project. The success of those responsible actions lies heavily on the Conservancy and the Design Review Committee. When is the Design Review Committee to be established? Reference should be available somewhere in the EIR regarding the implementation schedule, manner of establishing the Committee, number of members, the qualifications of the members and service terms. This group should be immediately identified, the activities protocol (bylaws?) established, and guidelines prepared for submitting, reviewing and processing site plans to not delay processing the initially submitted site plans.

12.06

4. **DEIR Table ES-1 – Mitigation 3-2:** “To minimize glare and "sky glow" from new outdoor area lighting, prior to County approval of any future plan area subdivision or other discretionary development application that includes exterior lighting, the project applicant/developer shall include in the project application materials lighting design measures that ensure protection of surrounding uses from spillover light and glare, use of low lighting fixtures, use of adequately shielded light sources, use of light sources that provide a natural color rendition, and avoidance of light reflectance off of exterior building walls.”

Q: What mechanism will be in place to enforce the removal of improper lighting that would violate this measure if it was to be installed in the future by a homeowner, business, etc? For example, a "security light" that is equivalent to an unshielded street light may be desired by a homeowner who may be unaware of this mitigative preventive requirement. Would the Conservancy enforce this measure or the County staff? What inspections would be made in the future to handle these issues? 12.07

5. DEIR Table ES-1 – Mitigation 6-4: "To provide additional direct mitigation for project impacts on Hennessey Creek riparian vegetation, and potential indirect, in-kind mitigation for riparian impacts elsewhere in the plan area, a *Hennessey Creek conceptual restoration plan shall be prepared.*"

Q: What entities will have the responsibility of preparing, reviewing and approving the restoration plan? This should be outlined in the MMRP. 12.08

6. DEIR Table ES-1 – Mitigation 6-7: "Implement Mitigation 6-7. Implementation of this measure as a condition of future individual discretionary project approvals, to the satisfaction of the listing jurisdictional agency (CDFG), would reduce this potential impact to a *less-than-significant level.*"

Q: Should Mitigation 6-6 be named here instead of 6-7? 12.09

7. DEIR Table ES-1 – Mitigation 7-1: "adoption of a project design objective for *public buildings* to achieve Leadership in Energy and Environmental Design (LEED) New Construction "Silver" Certification or better, in addition to compliance with California Code of Regulations Title 24 Energy Efficient Standards;"

Q: It is not clear whether this applies to residential buildings or private commercial buildings. Why isn't a more aggressive policy required by this EIR aimed at the all the buildings? Aren't the existing County energy conservation policies and regulations applicable to more than "public" buildings? 12.10

8. DEIR Table ES-1 – Mitigation 7-1: "planting of trees and vegetation near structures to shade buildings and reduce energy requirements for heating and cooling;"

Q: The Specific Plan building design standards includes incorporation of solar systems on rooftops. The tree selection and planting locations should consider the effect of the trees growing taller over time and shading the solar systems. What mechanism will be in place to monitor the buildings for these situations? Is this an enforcement duty for the Conservancy? If not, what agency would be the enforcement entity? This ongoing monitoring should be added to this EIR mitigation action. 12.11

9. DEIR Table ES-1 – Mitigation 11-2: "...the minimum riparian buffer width to protect water quality and ecosystem function shall be determined according to existing parcel size...Exceptions to these development setbacks apply to parcels where a parcel is entirely within the riparian buffer setback or development on the parcel entirely outside of the setback is infeasible or would have greater impacts on water quality and wildlife habitat."

Q: This description is confusing and subject to uncertain future interpretation. Which entity is to make these possible determinations? If the building is proposed within the buffer setback, how can 12.12

it be allowed? What is the purpose of the buffer setback if it doesn't exclude development in this area that needs protection? The exceptions should be limited to being less than 10% of encroachment (e.g. up to a 5 foot distance in a 50-foot width setback and up to a 15 foot distance in a 150-foot width setback). Such exceptions should be reviewed by the County Department of Resource Management to obtain their concurrence; differences in opinions of the Department and the Conservancy should be brought before the Planning Commission for final determination.

10. DEIR Table ES-1 – Impact 11-2: Ongoing Impacts on Water Quality. “Ongoing activities associated with project-facilitated development could increase the level of contaminants in receiving waters.” 12.13

Q: Shouldn't the potential for overflows from the proposed central wastewater treatment facility during power outages or equipment malfunction or operator error be discussed under this section, with the applicable mitigation measures listed? Similar comment included here for DEIR Pg 11-13.

11. DEIR Table ES-1 – Mitigation 16-1: “In the event that significant drawdown with documented adverse effects on nearby existing wells is observed, the Option B CSA management shall implement corrective measures sufficient to mitigate the impacts to a level of less than significant...”

Q: The EIR should be more explicit and indicate this potential responsibility of the CSA management means the corrective measures will be paid for by the CSA management. Won't this set up the potential for protracted legal and technical skirmishes regarding whether or not the adverse effects are caused by the new development water usage? The corrective measures should be implemented immediately since the affected party private homeowner may be out of water. Since the County is approving the new water supply, they should bear a heavy burden of investigating these adverse effects, and not force the affected private homeowner to seek expert consultation to provide technical information and opinions. Instead of this becoming a new economic burden on the taxpayers, will the EIR or Specific Plan require that the payment responsibility be placed on the project developers, similar to the cost recovery provisions indicated for the SID impacts described in Mitigation Measure 16-2, Item #5?

12.14

Where is the description of using the rainwater for toilet flushing? This is mentioned on Pg 4-24 of the Specific Plan. What treatment is needed at each house to remove the leaves and sediment rinsed out of the eave troughs into the rainwater storage container at each home? There must be a water level sensing unit in the containers that monitors whether there is sufficient water in the storage containers versus opening the freshwater valve for that water to be supplied to the toilet. What maintenance requirements for cleanouts and adjustments will this entail over time? What monitoring will be done by the CSA, Conservancy or ??? to determine the rainwater units haven't been bypassed by the homeowners who want to avoid the maintenance?

12. DEIR Table ES-1 – Mitigation 16-5: “Prior to County approval of any future residential subdivision map or substantive discretionary non-residential development application in the plan area under wastewater treatment option B or C, implement the following:...”

Q: The EIR should provide some guidance, such by examples, as to what entails a substantive development application.

12.15

13. DEIR Table ES-1 – Mitigation 16-6: “One possible approach may involve SID delivery of raw water to a single point in the proposed CSA system, for plan area distribution by a CSA-

operated distribution system. Formulation of this Wastewater Master Plan component to SID satisfaction would reduce this impact to a *less-than-significant level*."

Q: Does "formulation" mean planning? Shouldn't this be "formulation and implementation"?

12.16

14. DEIR Table ES-1 – Mitigation 16-6: "Wastewater treatment Option B would involve construction of the onsite MBR wastewater treatment plant, including aeration tank, membrane operating system and disinfection unit, pump station and lift station, utility shed and approximately 5.7 miles of pipeline (primarily within existing and proposed roadway rights-of-way)."

Q: What emergency backup is available during an extensive power outage (locally we experienced a 15-hour PG&E power outage in January 2010)? Is there a large storage tank for the incoming raw sewage that must be stored during an outage, or maybe more important, what storage will be required during an extensive plant maintenance period? Is emergency power generation to be included in the MBR plant?

12.17

15. DEIR Table ES-1 – Mitigation 16-7: "obtain written verification from the Cordelia Fire Protection District (CFPD) that either (1) the CFPD's need for a new fire station in the general vicinity has been met (e.g., by plans for a new station on the Rockville Trails Estates site), or (2) a new fire station is needed within the Specific Plan area."

Q: Why didn't the EIR consider upgrading the existing Green Valley Fire Station near Falls School to serve the entire local area? Within the Green Valley community there is extreme doubt that the Rockville Trails Estates fire station will ever be built since that speculative proposed subdivision may never materialize, or if it is implemented, it will include significantly fewer residences (thus cancelling the need for a fire station out there). Following the swelling citizenry intent in controlling government service expenditures, how can two fire stations within a few miles be afforded without excessive taxation? If an improved fire station is required due to more houses being located near Falls School in the upper Green Valley area (e.g. MGV & RTE) then the developers should pay a proportional share of the fees to upgrade and enlarge the existing fire station in the Green Valley Estates area. It is closer to the centroid of the homes in the valley and the highlands, reducing the response time to all the homes in the Green Valley area (as compared to the prospective MGV or RTE subdivision locations). To serve the MGV neighborhoods, a connection road should be established in the southward direction out of one of the existing streets at the south edge of the Green Valley Estates area, with the gate access controlled via an electrically operated gate that allows fire response vehicles to travel directly from the upper subdivision into the MGV development. In other words, the fire station, if left at the Falls School site, should have a quick route into the Three Creeks neighborhood near the winery, instead of needing to go east out Rockville Road to Green Valley Road, down to Mason Road and then back north through the MGV area. This alternative should be evaluated in the EIR involving contact and sharing of information with the fire protection officials.

12.18

16. DEIR Table ES-1 – Mitigation 16-8: "Implement mitigation measures identified in chapter 17, Transportation and Circulation, to reduce the impacts of Specific Plan-related traffic on Green Valley Road and other local roads. In addition, before approval of each Tentative Subdivision Map in the Specific Plan area, the County shall obtain written verification from the CFPD that proposed emergency access provisions meet CFPD road design and emergency access standards and require any necessary changes as a condition of map approval."

Q: This mitigation is confusing regarding the necessary project changes. Within the DEIR discussion are the statements: "As discussed in subsection 16.3.1 above, the CFPD would require

12.19

that roads in the Specific Plan area be a minimum of 18 feet wide, with maximum slopes of 12 percent. As indicated in subsection 16.3.4 above, the emergency vehicle access roads (fire roads) proposed by the Specific Plan would have 16-foot-wide pervious travel ways." For this public safety matter, why weren't the roads designed at the 18-foot width to ensure they will meet CFPD standards? Also see related fire access comments included for Figure 2.11.

17. DEIR Pg ES-74 – "(10) Mitigation Implementation. For those mitigation measures identified in this Draft EIR that are adopted by the County, a mitigation monitoring program will be undertaken to verify mitigation implementation pursuant to CEQA Guidelines section 15097 (Mitigation Monitoring and Reporting). Implementation of most of the mitigation measures recommended in this Draft EIR **could be** effectively implemented **through incorporation** into the Specific Plan itself and monitored through normal subsequent County development review procedures."

Q: Shouldn't this be a "will be" statement? Is the incorporation of the mitigation measures into the Specific Plan planned now?

12.20

18. DEIR Section 2.4.1 Specific Plan Organization and Contents "4.0 Implementation – Finance, Infrastructure and Execution, which identifies implementation policies, describes a proposed land use conservation trust—the Green Valley Conservancy—that would oversee agricultural operations and natural areas in the plan area, identifies details for providing infrastructure to the plan area, outlines administrative procedures, **describes the proposed development phasing**, and identifies financing methods."

Q: The development phasing is given in only general terms related to the building implementation. DEIR Figure 2.14 appears to be similar to Specific Plan Figure 4-6 – The trails are not shown on these figures. What are the implementation dates for the various trails? Would the trail through the Nightingale Hills be delayed until Phase 3A? This could result in delaying this mitigation for many years, thus losing the important opportunity of having public hiking/biking access in the western hills, which is an important part of the compromise reached in approving the MSV developments. See my associated comments on DEIR Figure 2.11. The trail schedule should be shown in the EIR to allow the timing of the impacts to be envisioned. Another question is what is the development schedule of the various new main access roads planned in the Plan? The road development should be aligned with the schedule of developing the emergency access roads for fire control.

12.21

19. DEIR Figures 2.6 & 2.7

Q: This comment refers to the early planting of the tree lines that are shown in the Biggs Subdivision next to Green Valley Road on Figure 2.6 (Proposed Specific Plan Illustrative Layout) and Figure 2.7 (Proposed Specific Plan Illustrative Detail for Green Valley Corridor). The purpose of these vegetation plantings are to provide the better aesthetics of blocking the house views from Green Valley Road. Two lines of trees are shown on these Figures between the west-most homes in the Biggs Subdivision. In the bottom left portion of Figure 2.7, another new line of trees is shown to block views of the new agricultural residence to be built there, marked with the label "Proposed Vegetation Screen". It takes some time (5 to 10 years) for the trees and vegetation to reach the 20-foot height to block the views of the houses from Green Valley Road views. Implementing the trees by the Conservancy should begin soon after approval of the MGVS Specific Plan. Tall vegetation does not now exist along the unnamed watercourse passing through the new Biggs Subdivision due to the past vineyard operation at this location. This drainage corridor is named as part of the Open Lands to be restored and enhanced in the MGVS Specific Plan Natural Open Lands Figure 3-10. This should be indicated as an early activity in the EIR MMRP. Were these planned rows of vegetation already included in the approval of the Biggs Subdivision?

12.22

20. DEIR Figure 2.11 Proposed Specific Plan Circulation System

Q: The Figure legend should contain a description for the trailhead "star". A trailhead should be shown in the Nightingale Neighborhood. The trail through the Nightingale Hills area may be one of the most popular since it will weave through rolling hill areas with no residences; hence the hiking/biking experience will involve a more extensive natural setting, with the potential of attracting a lot of visitors. One of the nice features of the Middle Green Valley Plan is the opportunity for hiking or biking around the loops that the trails provide. See my additional comments regarding this on DEIR Sections 16-4.4 and 16.4.5, and Mitigation 16-11. The trails extending westward into the foothills from the Elkhorn and Three Creeks trailheads are shown paralleling the roads leading to the rural houses in the adjacent areas. A more preferred natural trail route would be away from the road and the homes, with the trails passing through the open spaces areas. This would also be in compliance with County General Plan Policy RS.P-42 "Encourage the use of existing natural and human-made corridors such as creeks, railroad rights of way, and corridors when creating future bike path and trail alignments." How will the trail alignments be selected? What public involvement in the trail route selection will be involved in addition to commenting on this DEIR? Trails located through the internal areas would also provide better fire access throughout the western open space area. The roads needed for access to the water tanks should also be shown on Figures 2.11 and 2.12

12.23

21. DEIR Pg 2-29 "An improved emergency access/fire road would be provided in the foothill area to link the foothill portions of the Three Creeks Neighborhood and Elkhorn Neighborhood."

Q: Why is this emergency road not shown on DEIR Figure 2.11 (Proposed Specific Plan Circulation System)?

12.24

Q: An emergency access road should be planned westward and northward through the Nightingale Hills area for fire control. It should be shown on the Figure 2.11 map. It could be the trail route.

12.25

22. DEIR Section 2.4.6 Proposed Storm Drainage Provisions – (Pg 2-35) "Collection and reuse features, mainly consisting of the use of rain barrels and cisterns on private lots in the plan area."

"Please refer to chapter 11, Hydrology and Water Quality, of this EIR for details."

Q: Where in Chapter 11 is there any mention of rain barrels and cisterns? I could not find the details that are represented as being in this part of the DEIR. The EIR should reference the Specific Plan description of the use of these rainwater harvesting methods. What treatment is necessary for the rainwater harvesting? The EIR should discuss this water recycling program involving the methods of screening out leaves and dirt collected from roof eave gutters at each residence. References to successful use of these water conservation measures in subdivisions elsewhere in California would be helpful.

12.26

23. DEIR Figure 11.1 Hydrologic Features in Plan Area and Vicinity

Q: Why does the outline of the groundwater basin in this figure differ from what should be the same delineation in Figure 16.1? See comment made for Figure 16.1.

12.27

24. DEIR Impact 11-2 Ongoing Impacts on Water Quality (Pg 11-13) "Sources of pollutants could include (a) runoff from new roadways, parking areas, and other paved areas; and (b) herbicides, pesticides, and fertilizers used in new agricultural activities and new domestic landscaping."

Q: Why doesn't this list of potential sources of runoff contamination include the possible runoff of pollutants from the wastewater treatment plant that occur from operator error spills of raw sewage or treatment aids?

12.28

25. Changes in Impacts on Groundwater Resources (Pg 11-14) "Given the abundance of groundwater recharge sources in the plan area, and the spatial limitations of the Specific Plan-proposed development areas, there is no basis to anticipate an adverse project groundwater impact; i.e., the impact of the proposed Specific Plan on groundwater would be *less-than-significant*."

Q: To amplify the "less-than-significant" conclusion the EIR should include more background information on the occurrence (location) of groundwater within the Green Valley area and the extent and volume of the groundwater resources. The EIR should show a cross-section of the valley and the groundwater basin. It should describe how the local MGV groundwater basin water occurrence conditions where the subdivision well(s) would be located are different from the groundwater conditions presented in the Rockville Trail Estates proposed development. Does the Green Valley fault show groundwater levels to be different from the west to east across the MGV area? What effect has been noted from the pumping of the new large water well at the country club golf course? What groundwater level drawdowns have been estimated by the hydrogeologists from pumping of the well(s) that would serve the new MGV subdivisions? The EIR should also contain more water quality information indicating the depths and locations of good and poor groundwater. Also see my related comments for Chapter 16.

12.29

26. DEIR Figure 16.1 Proposed Specific Plan Water Supply Features--Option A (Municipal Connection) and Option B (Onsite Groundwater)

Q: On this map the groundwater basin is shown in light blue. Why does the coloring contain splotches of white spread throughout the project area? Some of these white areas may be rocky areas, but under Jeni Lane and in the Biggs subdivision on the eastern side of Green Valley Road, and along Green Valley Creek, doesn't the groundwater basin extend there too? Same comment for Figure 16.2. What is the "Phase I" label in the Biggs subdivision area intended to represent? These comments also apply to the similar figures contained in Chapter 2.

12.30

27. DEIR Section 16.1.4 Relevant Project Characteristics
(c) Specific Plan-Domestic Proposed Water Supply Options

In this subsection, the following statement is included on Pg 16-15: "The three wells would draw groundwater from the Green Valley-Suisun aquifer of the Suisun-Fairfield Groundwater Basin, which has an estimated saturated thickness of in excess of 400 feet."

Q: Is there more groundwater occurrence information elsewhere in the DEIR? The ground water information contained for Alternative Water Source 2 is referenced to be based upon generalized state water bulletin descriptions, and for the project area, it may be optimistic. The EIR should provide a greater evaluation of the occurrence of groundwater underlying the Planning Area. Such groundwater extraction for the MGV development should not overly extract groundwater used as the sole water supply for surrounding existing residences. The following are the County

12.31

requirements summarized in Section 16.1.4 (Policy and Regulatory Framework) that don't appear to have been satisfied in the DEIR:

From Pg 16-10: "In areas identified with marginal water supplies, require appropriate evidence of adequate water supply and recharge to support proposed development and water recharge. (Policy PF.P-14)"

From Pg 16-10: "Continue to require preparation of a water supply assessment pursuant to the California Water Code to analyze the ability of water supplies to meet the needs of regulated projects, in the context of existing and planned future water demands... (Implementation Program PF.I-11)"

More evidence than a mere statement of 400 feet of saturated thickness of the underlying sediments should be presented in this EIR. The DEIR also includes the admissions that incomplete information on the groundwater supply is now contained in the DEIR. On Pg 16-18 it is stated: "At this preliminary point, no hydrologic studies have been completed or test wells drilled for Option B planning purposes. Although the local recharge volume for this aquifer (from rain infiltration, irrigation, and stormwater detention ponds) would be expected to substantially exceed maximum project demands, a detailed hydrological analysis would be necessary when the proposed plan area well locations are more precisely determined, demonstrating that the proposed well system is capable of delivering sustained supply rates sufficient to meet County and State standards for the Specific Plan proposed development program."

This section of the DEIR also includes the statement: "...the San Francisco Bay Regional Water Quality Control Board has indicated that the Suisun-Fairfield Valley Groundwater Basin "is not used in significant capacity because of low flow and poor water quality" and believes that a comprehensive hydrogeology study is needed if the aquifer is to serve as the main source of drinking water for proposed development within the Specific Plan area."

More groundwater information should be included in the EIR.

From Pgs 16-18 & 16-19: On these pages the following statements are contained in the DEIR: "This established County and State review and approval process would ensure that, under water supply Option B, the project would result in a less-than-significant environmental impact pertaining to water supply adequacy."

"No significant environmental impact has been identified; no additional mitigation is required."

Q: Without the additional information to confirm the speculation that sufficient groundwater supplies will exist and not adversely affect existing water supply wells, isn't it premature for the DEIR to include the above conclusions?

12.32

28. DEIR Mitigation 16-1: "Under water supply Option B, the well monitoring and reporting procedure required by the County for community water systems shall include evaluation (testing, analysis and monitoring) of potential drawdown resulting from operation of the proposed Option B wells. In the event that significant drawdown with documented adverse effects on nearby existing wells is observed, the Option B CSA management shall implement corrective measures sufficient to mitigate the impacts to a level of less than significant..."

Q: CSA management shall implement corrective measures.... Please see my related comments under DEIR Table ES-1 – Mitigation 16-1.

12.33

29. Cumulative Water Supply Impacts (Pg 16-26) "...There is one listed project within unincorporated Solano County, the proposed Rockville Trails Estates Project, that might cumulatively combine with the Specific Plan, under water service Option B, in the use of local

groundwater for daily potable water needs. With implementation of the groundwater impact mitigations identified above, implementation of the Specific Plan and this related project would not result in a cumulative overdraft of the area's aquifer. Therefore, cumulative water supply impacts would be *less than significant* and no additional mitigation measures are required."

Q: The mitigations to be implemented involve future studies to confirm that sufficient groundwater supply will exist. Where is there proof at this time that the claim in this portion of the DEIR is not speculative, and hence why this impact not be listed as potentially significant since the groundwater situation has not been conclusively investigated? 12.34

30. (c) Specific Plan-Proposed Wastewater Treatment Options

(2) *Wastewater Treatment Option B: (Pg 16-32) "In addition, approximately 5.7 miles of pipeline would be installed under roads in the Specific Plan area (see Figure 16.2)."*

Q: Under Option A, where the treated wastewater effluent is discharged to the FSSD, on Pg 16-30 the DEIR lists 9 miles of onsite pipeline in that option. Option B would have the same on-site raw sewage collection sewers and the connection to the end of the existing City of Fairfield sewer line in Green Valley Road (and maybe the parallel sewer line to the Cordelia Pump Station); in addition wouldn't there be additional pipelines involved in delivering the recycled water to the irrigation mixing station and under the roads to deliver the recycled water to the individual residences and commercial establishments for toilet flushing? Would this constitute a total of 14.7 miles of pipeline for Option B? The EIR should identify that each home would have a recycled water line connected to it. Note that the similar descriptions of the wastewater treatment system in Chapter 2 should be reviewed for this question too. 12.35

31. DEIR Section 16.4.4 Relevant Project Characteristics (Pg16-54) "In the Nightingale Neighborhood: greens, rambles, and community gardens, along with a minimum of five acres of sports fields, consisting of a sports field area at the northern edge of the neighborhood and a more casual field area on the south side of Hennessey Creek. (A community recreation center and a spa and fitness facility, designated *Community Services*, are also envisioned for this neighborhood.)"

Q: The above statement should include a trailhead being envisioned similar to the listing in the Elkhorn and Three Creeks neighborhoods. The parking for this location may need to be larger than 8 to 10 spaces since it may become the most popular starting point for hiking and biking within the whole project. This location will be the closest to the City of Fairfield residents and the freeways, and will traverse through the attractive rolling hills setting. Eventually it will be linked to the bay ridge trail system. Contact should be made with trail planning organizations to elicit their recommendations on the trailhead facilities and routes to be provided. 12.36

Also see my comment for Figure 2.11. MGV Specific Plan Figure 5-77 should also be revised to match the revised EIR designations regarding trailheads, trail parking areas and the locations of the trails.

(Continuing on Pg 16-54) "As shown on Figure 2.9 (Proposed Specific Plan Circulation System) in chapter 2, Project Description, the Specific Plan would designate trails along the west side of Green Valley Road, throughout the Nightingale, Elkhorn, and Three Creeks neighborhoods, and extending into the foothills in the western part of the plan area."

Q: When will these trails be developed? The schedule should be described in the EIR. The Specific Plan envisions the 3 neighborhoods will be implemented in stages. The final version of the trailheads would most probably be constructed as the individual subdivisions are implemented. To 12.37

provide early public access and also invoke one immediate mitigation for the project approval, the western trails should be implemented in Phase 1 of the project. Temporary parking areas and trailheads can suffice until the neighborhood features are developed. The early implementation would also provide fire control access into the western areas.

**32. DEIR Section 16.4.5 Impacts and Mitigation Measures
Project Demand for Parks and Recreational Facilities**

Mitigation. "No significant impact has been identified; no mitigation is required."

Q: As indicated in my comment above, a trailhead within the Nightingale neighborhood is not now shown in the MGV Specific Plan or in the DEIR. Without the provision of this area, and accompanying toilet facilities, this will result in biking/hiking enthusiasts parking on the neighborhood streets. Toilet facilities should be provided to preclude trail users from going in the bushes and woods. Since this trail starting point may be the most popular entry point for the use of the trails through the western foothills, this may constitute a significant impact to the local residents of this neighborhood. The Nightingale area trailhead should be added to the applicable EIR maps (such as DEIR Figure 2.9) and be listed appropriately in the MGV Specific Plan and shown on the applicable maps in that document too.

12.38

33. DEIR Mitigation 16-11. "As a condition of each Tentative Subdivision Map in the Specific Plan area, the County shall require written verification that the Bay Area Ridge Trail Council has reviewed and approved final trail design and construction to ensure that trails within the Specific Plan area comply with Bay Area Ridge Trail standards, as appropriate."

Q: This statement implies that the Bay Area Ridge Trail Council will have a part in selecting the location of the trails in the western area. Thus this may provide outside entity review of my recommendation that the trails not be located along the residential access roads, as I mention in my comment for DEIR Figure 2.11.

12.39

34. DEIR Section 16.6.2 Pertinent Plans and Policies "The County's residential diversion rate was estimated to be about 3 percent in the year 2000. A greater percentage of diversion is expected to occur as implementation of SRRE-identified programs is continued and expanded."

Q: Why weren't more recent results obtained from the County Department of Resource Management? The County and the cities have been achieving waste diversion rates far above the 3 percent level and have been in compliance with the State mandated rates.

12.40

35. DEIR Section 16.6.4 Relevant Project Characteristics

Q: After reviewing the MGV Specific Plan I commented on the facilities for solid waste storage and the collection service. I note that the DEIR describes the landfill use and proposes good recycling programs. But the following seem to be lacking in the DEIR. Contact should be maintained with the Solano Garbage Co., the local service provider for solid waste and recyclables collection, to coordinate the design of the residences and commercial establishments and the school to assure sufficient storage space is available for the multiple toters and bins associated with the garbage, green materials, and recyclables storage. Such design should include providing sufficient access, including providing sufficient truck turning space and avoiding low overhead tree branches, to allow efficient truck access. The automated pickup trucks operate most efficiently when only one pass through the travel corridor is required. In the alleys this may necessitate the residents on one

12.41

side of the alley to locate their toters on the opposite side of the alley to allow truck service to the storage containers.

36. **DEIR Section 17.3.3 Project Characteristics** – “As shown on Figure 2.9, Proposed Specific Plan Circulation System, in chapter 2 (Project Description), two plan area vehicular access points are proposed along Green Valley Road, and both are proposed to be controlled by roundabouts. The project-generated vehicular traffic has been distributed to these two access points in this EIR analysis based on the Specific Plan proposed land use layout and internal circulation system.”

Q: In the MGV Specific Plan the roundabouts are indicated to be a 16-foot travel lane with an inside radius of 45 feet. How does this compare with the Rockville Road/Abernathy Road roundabout? That traffic-circle was squeezed into the available space which was cramped, resulting in a tight travel-way. The Middle Green Valley roundabouts should have more generous dimensions.

12.42

37. **DEIR Section 17.3.11 Roadway Segment Impacts (Pg 17-34)** “Previous analyses have indicated that traffic from approved projects in the area would trigger the need to widen the roadway shoulders on this segment of Green Valley Road by an additional four feet to meet County Roadway Standards. However, numerous constraints and other factors were identified that ultimately resulted in a County decision not to widen the roadway. This EIR section indicates no significant impact has been identified, and hence no mitigation is required.”

Q: I support the no mitigation road widening conclusion. The project approval should not include widening Green Valley Road. The existing 2 foot width gravel/dirt shoulder along the road edges could be paved to remove the drop-off condition that now extends along the road pavement edges. Adding wider widths similar to the wide paved shoulders along Rockville Road will lead to more speeding. Note that on the wider Rockville Road cars and motorcycles routinely drive recklessly down the straight sections at more than 80 mph. An article on this safety hazard was published in the Fairfield Daily Republic on February 23, 2010 expressing the local residents' concerns about the current speeding traffic. Since the bike/walking trail is already in place along Green Valley Road, an extensively widened road is not needed.

12.43

38. **DEIR Table 21.1 Mitigation Monitoring Checklist**

Q: In addition to listing the County and other public agencies with the general responsibility for the mitigation activity, wouldn't it be appropriate to have the responsibilities of the Conservancy, Design Review Board and the Community Services Agency also listed in the MMRP for the applicable activities?

12.44

12. Larry Burch, P.E., 6 Spring Lane, Green Valley, CA 94534; January 25, 2010

- 12.01 General EIR comment--development agreement--Development Agreement will define and assign the roles and responsibilities of the County, landowner and proposed Green Valley Conservancy in implementing the Specific Plan policies and EIR mitigations; it would have been good to have it available when reviewing the Draft EIR.

Response: Please see Master Response F.

- 12.02 General EIR comment--Specific Plan implementation--The Planning Commission and Board of Supervisors should retain control over planning within the area, plus oversight of the proposed Conservancy, and step in if necessary.

Response: Please see Master Response H.

- 12.03 General EIR comment--The Draft EIR gives the impression that mitigations will be implemented after the Conservancy is formed, which would occur after the first site plan application is filed. The Conservancy and the Design Review Committee should be established soon after plan adoption to work with developers early in the process.

Response: Please see Master Response H.

- 12.04 Executive Summary--required approvals--This section should indicate that the Specific Plan must incorporate the mitigation measures recommended in the EIR.

Response: DEIR section 21.1 on DEIR p. 21-1 adequately explains that "Most of the environmental mitigation needs that have been identified in this EIR would either be incorporated into the Specific Plan itself or subject to effective monitoring through the County's normal development review and approval process for subdivisions and other discretionary improvement activity in the plan area, and if necessary, during associated plan check and field inspection procedures."

- 12.05 Executive Summary--Where the County is listed in the Mitigation Responsibility column in Table ES-1, the EIR should more specifically indicate whether it would be the Conservancy, Design Review Committee or CSA that would be responsible for implementing the measure, and where the measure would involve the Development Agreement.

Response: The DEIR does specifically indicate under each specific mitigation measure who would be responsible for implementing the measure, including indications as appropriate when the Conservancy Design Review Committee (advisory to the County) or CSA would have responsibility, and where a particular measure may be implemented all or in part through the Master Development Agreement.

- 12.06 General EIR comment--The Draft EIR mitigations rely heavily on the Conservancy and the Design Review Committee. The Design Review Committee should be immediately identified, bylaws established, and guidelines prepared for submitting, reviewing and processing site plans. The Draft EIR should explain the implementation schedule, manner for establishing the committee, number and qualifications of members, and service terms.

Response: Please see Master Response H.

- 12.07 Aesthetics--spill light, glare and sky glow--How would Mitigation 3-2 be monitored and enforced, for example, if improper lighting in violation of this measure were installed by an unaware homeowner?

Response: Implementation of Mitigation 3-2, like all other DEIR mitigation measures and other County development policies and standards, would be carried out through incorporation into the Specific Plan as County policy and/or incorporation into the Mitigation Monitoring and Reporting Plan required as part of the EIR findings, and ultimately as specific conditions of individual subdivision approvals in the plan area. Failure to implement and maintain compliance with such requirements would represent violations subject to standard County zoning enforcement procedures (see County Code sec. 28-65).

- 12.08 Biological Resources--riparian habitat--What entities will be responsible for preparing, reviewing and approving the Hennessey Creek Restoration Plan? This should be explained in the mitigation monitoring and reporting program (MMRP).

Response: The DEIR explains on p. 6-62 that the Hennessey Creek Restoration Plan would be subject to approval by the CDFG and Water Board.

- 12.09 Executive Summary--Should Mitigation 6-7 in Table ES-1 instead be Mitigation 6-6?

Response: Yes; comment acknowledged. See corresponding correction to DEIR Mitigation 6-7 in section 3, Revisions to the Draft EIR, herein.

- 12.10 Climate Change--Mitigation 7-1 is unclear whether the standard of LEED Silver or better applies to private commercial and residential buildings. Why wouldn't the LEED Silver standard be required for all buildings? Don't County energy conservation policies and regulations apply to more than just public buildings?

Response: In response to this comment, the word "public" has been replaced with "residential and commercial." See this revision to DEIR p. 7-16 in section 3, Revisions to the Draft EIR, herein.

- 12.11 Climate Change--Mitigation 7-1, planting shade trees near buildings to reduce energy use could conflict with the Specific Plan design standard for rooftop solar systems. This mitigation measure should be revised to indicate how and by which entity this potential conflict would be monitored and resolved.

Response: This issue can be readily resolved on a routine, building-specific design review basis.

- 12.12 Hydrology and Water Quality--riparian setbacks--The wording of Mitigation 11-2 is confusing. Which entity would make determinations regarding exceptions to setbacks? What is the purpose of the setback if it doesn't exclude development where protection is needed? Exceptions should be limited to encroachments of less than 10 percent of the buffer width. Exceptions should require Department of Resource Management concurrence. Differences of opinion between the Department of

Resource Management and the Conservancy should be resolved by the Planning Commission.

Response: Riparian setback requirements and associated jurisdictional agency approval requirements are now specifically described in DEIR chapter 6 (Biological Resources) under Impact 6-4: Impacts on Riparian Communities, and Mitigation 6-4, on DEIR pp. 6-61 through 6-63, and under Impact 6-5: impacts on Wetlands, Streams and Ponds; and Mitigation 6-5, on DEIR pp. 6-63 through 6-66.

- 12.13 Hydrology and Water Quality--Potential water quality impacts from wastewater treatment facility overflows during power outages, equipment malfunction or operator error should be discussed.

Response: Please see response to similar comments 7.36 and 12.17.

- 12.14 Public Services and Utilities--Water--The EIR should clearly indicate that the cost of verifying and mitigating groundwater drawdown affecting nearby existing wells would be borne by the County Service Area (CSA) and not by the owners of those existing wells, to avoid protracted conflicts over responsibility and ensure adverse effects are promptly remedied.

The Draft EIR does not address the Specific Plan proposal to use rainwater for toilet flushing, including maintenance requirements and how to ensure these systems will continue to be maintained and used by individual homeowners over time.

Response: It is the proposed Specific Plan intent that the cost of verifying and mitigating any groundwater drawdown effects on nearby existing wells would be borne on a fair share basis by all properties within the CSA boundary, and not by the individual owners of existing wells, including wells outside the CSA boundary.

Regarding the proposed use of rainwater for toilet flushing and the need for associated long-term operation and maintenance assurances, these infrastructure details would be forthcoming when specific second-tier projects are under consideration. The development of such detailed, site-specific information will occur during the required subsequent subdivision approval process, where under standard County subdivision review and approval procedures, such project details as ongoing implementation and maintenance requirements are considered and ultimately established with adoption of the Final Subdivision Map and County Service Area infrastructure specifications.

- 12.15 Public Services and Utilities--Water--Mitigation 16-5 would be implemented for any "substantive" development application. The Draft EIR should explain what constitutes a substantive development application.

Response: The word "substantive" has been removed from DEIR Mitigation 16-5 in response to this comment; see the revised version of DEIR p. 16-37 in section 3, Revisions to the Draft EIR, herein.

- 12.16 Public Services and Utilities--Water--Mitigation 16-6 states that, "...Formulation of this Wastewater Master Plan component to SID satisfaction would reduce this impact to a less than significant level." Does "formulation" mean planning? Shouldn't this be formulation and implementation?

Response: The Mitigation 16-6 verbiage provides sufficient mitigation assurance; the phrase “formulation of this Wastewater Plan component to SIP satisfaction” provides a sufficient performance standard.

- 12.17 Public Services and Utilities--Wastewater--What emergency power supply or wastewater storage would be available for an on-site wastewater treatment plant under Option B during a power outage or extensive plant maintenance period?

Response: The wastewater Option B system design would be required to incorporate standard State and County emergency provisions for power outage and standard interim backup provisions for plant maintenance.

- 12.18 Public Services and Utilities--Fire Protection and Emergency Services--The EIR should consider a fair share contribution to upgrading the existing fire station near Falls School instead of building two costly new fire stations, since the Rockville Trails Estates fire station may never be built and, if a new emergency vehicle access road were built connecting Green Valley Estates, the existing fire station would provide quicker response times to the project than the proposed new stations.

Response: Before the first subdivision map is approved, fire station needs will be met. Please also see response to comment 9.01.

- 12.19 Public Services and Utilities--Fire Protection and Emergency Services--Mitigation 16-8 is confusing regarding necessary project changes. Why weren't emergency vehicle access roads designed at the 18 foot width to ensure that they will meet Cordelia Fire Protection District standards?

Response: The verbiage on DEIR p. 16-47 has been revised to correctly read, “...the emergency access roads (fire roads) proposed by the Specific Plan would have 16-foot-wide pervious travel ways plus one-foot shoulders on each side, thereby meeting the 18-foot minimum width requirement of the CFPD.” See this revision to DEIR p. 16-47 in section 3, Revisions to the Draft EIR, herein. All Specific Plan area road improvements would require review and approval by the County and CFPD.

- 12.20 Executive Summary--mitigation implementation--The Draft EIR (p. ES-74) states that, “Implementation of most of the mitigation measures recommended in this Draft EIR could be effectively implemented through incorporation into the Specific Plan itself...” Shouldn't this be “will be?” Will the mitigation measures be incorporated into the Specific Plan?

Response: Yes. Comment acknowledged. See corresponding correction to DEIR p. ES-74 in section 3, Revisions to the Draft EIR, herein. Also, see related response 12.04.

- 12.21 Project Description--phasing--Draft EIR Figure 2.14 does not show the phasing of trails development. The trails development schedule should be included in the EIR. What are the implementation dates for the various trails? Would the trail through the Nightingale Hills, a key mitigation for development, be delayed until Phase 3A? Also, what is the schedule for the various main access roads? Road development should be coordinated with emergency access roads for fire.

Response: Please see Master Response E.

- 12.22 Project Description--vegetation screens and creek restoration--The two rows of trees planted to screen homes in the Biggs Subdivision from views from Green Valley Road, and the restoration of vegetation along the unnamed drainage through the Biggs Subdivision, should be done early to allow time to grow. Were the planned rows of vegetation already included in the approval of the Biggs Subdivision?

Response: The Biggs Subdivision is part of the DEIR “existing setting” baseline and not part of the proposed project (Specific Plan). The DEIR therefore does not analyze the potential effectiveness of Biggs Subdivision landscaping improvements.

- 12.23 Project Description--trail system--The legend for Figure 2.11 should contain a description for the trailhead “star.” A trailhead should be shown in the Nightingale neighborhood. A preferred alignment for the trails westward into the foothills from the Elkhorn and Three Creeks trailheads would be through the open space areas rather than paralleling the roads to the rural houses, as shown. This would be more consistent with General Plan Policy RSP-42 and would provide better fire fighting access. How will the trail alignments be selected and what public involvement will there be? The roads needed for access to the water tanks should be shown in Figures 2.11 and 2.12.

Response: Please see Master Response E. There is no trailhead proposed in the Specific Plan for the Nightingale Neighborhood.

Public involvement has been adequately provided for throughout the preparation of the Specific Plan and EIR.

The suggested depiction of service access to the designated water tanks is duly noted and will be included in the final Specific Plan.

- 12.24 Project Description--circulation--Why is the emergency access road linking foothill portions of the Three Creeks and Elkhorn neighborhoods not shown in Figure 2.11?

Response: There is no emergency access road proposed by the Specific Plan at this location.

- 12.25 Project Description--emergency access--An emergency access road should be provided west and north through the Nightingale Hills area and shown in Figure 2.11. It could also serve as the trail route.

Response: This comment regarding the project will be considered by County decision-makers in their future deliberations on the Specific Plan. No specific need for this emergency connection in particular has been identified in the DEIR.

- 12.26 Project Description--drainage--Page 2-35 describes proposed rainwater harvesting and refers the reader to Chapter 11 Hydrology and Water Quality for details. However, Chapter 11 does not mention rainwater harvesting. The EIR should reference the Specific Plan description of proposed rainwater harvesting and discuss details, such as what treatment is necessary, and reference other successful examples elsewhere.

Response: The reference on DEIR p. 2-35 to Chapter 11 “for details” is a general reference regarding all project hydrology and water quality aspects that pertain to an identified environmental impact or mitigation concern. The reference does not specifically apply to rainwater harvesting. The DEIR has identified no significant environmental impact associated with potential project rainwater harvesting provisions.

- 12.27 Hydrology and Water Quality--Why does the outline of the groundwater basin in Figure 11.1 differ from that in Figure 16.1?

Response: An improved version of Figure 16.1 is included in section 3 of this Final EIR document which more clearly indicates the Suisun-Fairfield Groundwater Basin and is more clearly consistent with Figure 11.1.

- 12.28 Hydrology and Water Quality--ongoing impacts on water quality--Why doesn't Impact 11-2 include pollutants from spills of sewage or treatment chemicals from the wastewater treatment plant?

Response: The potential for hazardous materials spills or mishandling impacts associated with operation of the onsite wastewater treatment plan under wastewater Options B and C is addressed in DEIR chapter 15, Public Health and Safety, under Impact and Mitigation 15-2.

- 12.29 Hydrology and Water Quality--groundwater--To justify the conclusion of a less than significant impact on groundwater, the EIR should include more information of local groundwater, including: a cross-section of the valley and the groundwater basin; how groundwater conditions where the proposed wells would be located are different than conditions in the proposed Rockville Trails Estates development; any differences in groundwater levels from west to east across the valley due to the Green Valley fault; any identified effects of the new large well at the country club golf course; estimated drawdown due to the new wells; and the depths and locations of good and poor groundwater.

Response: Please see Master Response I.

- 12.30 Public Services and Utilities--Water--what are the white areas in Figures 16.1 and 16.2, and the corresponding figures in Chapter 2; not part of the groundwater basin? What does the Phase I label in the Biggs subdivision area represent?

Response: The white areas on Figures 16.1 and 16.2 and the corresponding figures in Chapter 2 are Specific Plan-designated development areas. The “Phase 1” label in the Bigg’s subdivision on Figures 16.1 and 16.2 and other EIR figures was derived from an incorrect reference in the draft Specific Plan; the label is erroneous and has been eliminated from the final version of the Specific Plan to be brought forward for County approval.

- 12.31 Public Services and Utilities--Water--The information about groundwater presented in the Draft EIR is inadequate and insufficient to support the conclusion of a less than significant impact. The Draft EIR groundwater analysis does not satisfy General Plan policy PF.P-14 or Implementation measure PG.I-11.

Response: Please see Master Response I.

- 12.32 Public Services and Utilities--Water--The Draft EIR conclusion of a less than significant impact related to water supply is premature because it is based not on evidence but on future County and State verification and approval.

Response: Please see Master Response C and Master Response I regarding alleged speculative assertions and deferred studies pertaining to water supply.

- 12.33 Public Services and Utilities--Water--(repeats comment 12.14) The EIR should clearly indicate that the cost of verifying and mitigating groundwater drawdown affecting nearby existing wells would be borne by the County Service Area (CSA) and not by the owners of those existing wells, to avoid protracted conflicts over responsibility and ensure adverse effects are promptly remedied.

Response: Please see response to comment 12.14.

- 12.34 Public Services and Utilities--Water--The groundwater situation has not been conclusively investigated. The Draft EIR analysis is speculative; there is no proof to claim less than significant. The mitigation defers to future studies a fundamental issue that needs to be resolved now.

Response: Please see Master Responses B, C and I.

- 12.35 Public Services and Utilities--Wastewater--The Draft EIR (p. 16-32 and corresponding descriptions in Chapter 2) states that Option B would involve 5.7 miles of pipeline. However, Option B has the same layout as Option A, which would involve 9 miles of pipeline. In addition, Option B would also have recycled water pipelines to the irrigation mixing station and each home. Would this constitute a total of 14.7 miles of pipeline for Option B?

Response: DEIR p. 16-30 indicates that wastewater service Option B would include "approximately 9 miles of onsite pipeline (see Figure 16.2)." DEIR p. 16-32 indicates that "In addition, approximately 5.7 miles of pipeline would be installed under roads in the Specific Plan area (see Figure 16.2)." The two sentences are correct as worded and indicate a total of 14.7 miles of pipeline for Option B. The DEIR impact and mitigation findings regarding the wastewater system option include consideration of this pipeline total.

- 12.36 Public Services and Utilities--Parks and Recreation--The description of project characteristics in Section 16.4.4 should include a trailhead, similar to the descriptions for the Elkhorn and Three Creeks neighborhoods. More than 8 or 10 parking spaces would be needed since this would be the most popular and accessible trailhead, and would connect to the Bay Ridge Trail system. Input should be sought from trail planning organizations on trailhead facilities and routes. Specific Plan Figure S-77 should be revised to match the revised EIR designations regarding trail alignments, trailheads and parking.

Response: This comment does not pertain to a CEQA-identified environmental topic or mitigation requirement. As a note, there is no trailhead proposed in the Nightingale Neighborhood. Please see Master Responses A and E.

- 12.37 Public Services and Utilities--Parks and Recreation--When will the trails into the western foothills along the west side of Green Valley Road through the Nightingale, Elkhorn and Three Creeks neighborhoods be developed? They should be implemented in Phase I, with temporary facilities if needed. Early development of these trails would also provide fire fighting access to the western areas.

Response: Please see responses to related comments 7.12, 7.42, 12.23 and 12.21. Please also see Master Response E.

- 12.38 Public Services and Utilities--Parks and Recreation--The trailhead within the Nightingale neighborhood is not shown in the Draft EIR or the Specific Plan. Without trailhead parking and toilet facilities for what may be the most popular entry point, this may be a significant impact on the neighborhood.

Response: No trailhead is proposed within the Nightingale Neighborhood in the current version of the Specific Plan. See Master Response A.

- 12.39 Public Services and Utilities--Parks and Recreation--Bay Area Ridge Trail Council approval of trail facilities may address comment 12.23 regarding a preferred trail route through open space areas rather than paralleling roads.

Response: Please see Master Response E.

- 12.40 Public Services and Utilities--Solid Waste Management--Why weren't diversion rates more recent than 2000 presented?

Response: The state diversion rate requirement cited on DEIR p. 16-62 reflects State-adopted AB 939, which was enacted in 2000.

- 12.41 Public Services and Utilities--Solid Waste Management--The design of project homes, and commercial and school facilities should be coordinated with the Solano Garbage Company to ensure adequate storage, and efficient access and collection of trash and recycling.

Response: Comment acknowledged. Such solid waste management detail would be the proper subject of second-tier site-specific project planning and review (see Master Responses B and C).

- 12.42 Transportation and Circulation--roundabout design--The Rockville Road/Abernathy Road roundabout is too tight; Middle Green Valley roundabouts should have more generous dimensions.

Response: The Specific Plan illustrated roundabout design configuration remains conceptual. The final roundabout design will be formulated by the County Department of Public Works to reflect current practice.

- 12.43 Transportation and Circulation--Green Valley Road should not be widened. The existing two-foot dirt shoulder could be paved. Widening Green Valley Road would lead to more speeding, like on Rockville Road.

Response: Widening of Green Valley Road is not proposed. The Solano County Department of Public Works is requiring stabilization of the roadway shoulders along the route (e.g., compressed gravel). In addition, the DSP proposes that the speed limit be reduced to 35 mph and has included two roundabouts (one at Mason Road and one at the Eastridge entrance) as traffic calming measures. Please also see Master Response A.

- 12.44 Mitigation Monitoring Checklist--The responsibilities of the Conservancy, Design Review Board and Community Services Agency should also be listed in the checklist.

Response: The responsibilities of these entities are adequately described in the Specific Plan. Please also see Master Responses G and H. The mitigation responsibilities of these entities are indicated where applicable in the MMRP checklist included in section 4 of this Final EIR document.