

ADDENDUM NO. 2
TO THE SOUTHWEST DIXON
SPECIFIC PLAN EIR FOR THE SW DIXON
– HARVEST PROPERTY OPERABLE
UNIT 3-EAST (OU-3 EAST) REMOVAL
ACTION WORK PLAN
(STATE CLEARINGHOUSE NUMBER 2002040237)

Prepared for:

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1.0 Addendum to the Southwest Dixon Specific Plan EIR

1.1. INTRODUCTION/BACKGROUND

The Southwest Dixon Harvest Property, Operable Unit 3-East (OU-3 East or Site) is part of a 330-acre development known as the Southwest Dixon Specific Plan (SWDSP) or Homestead. The Site is approximately 45 acres and includes a portion of Solano County Assessor Parcel Number (APN) 0114-012-010 and all of APN 0114-012-050 and APN 0114-012-060. (Figure 1) The Site is proposed for residential development but was historically planted with agricultural row crops.

As a result of the previous land use, a Preliminary Endangerment Assessment Report (PEA) was prepared for the Site in 2022. The PEA identified and delineated elevated toxaphene levels to the upper 12 inches of soil, with approximately 56,000 cubic yards of total soil being impacted. The PEA report recommended the development of a Removal Action Workplan (RAW) to address the elevated toxaphene levels to the upper foot of soil within the Site.

The purpose of the RAW is to identify the preferred remedial alternative to describe the proposed procedures and protocols for remediation of toxaphene-impacted soil at the Site to allow for future residential development. This Addendum was prepared to identify and analyze any environmental impacts to human health and/or the environment with the excavation of approximately 56,000 cubic yards of contaminated soil.

1.2. SOUTHWEST DIXON SPECIFIC PLAN EIR

The Southwest Dixon Specific Plan Environmental Impact Report (SCH 2002040237) (SWDSP EIR) was certified by the City of Dixon (City) in March 2004 pursuant to Resolution No. 04-195, and the SWDSP project was approved by the City in 2005, pursuant to approval of Resolution 2005-217. In 2008, the City amended the SWDSP to add 40.9 acres of land east of Pitt School Road and south of Southeast Parkway to increase the low-density residential acreage from 185.53 to 226.43, but leaving the total number of dwelling units unchanged.

In 2016, the City amended the SWDSP to designate a portion of the specific plan to RM-4 (multi-family) to accommodate affordable housing within the specific plan area. In 2019, the City adopted the first addendum to the SWDSP EIR and approved an Amended and Restated Development Agreement for the SWDSP, as well as tentative maps for Phase 1, Villages 2 and 3. In support of the first addendum, the City commissioned a transportation phasing study, which was prepared by Fehr & Peers to determine whether the changes in traffic mitigation outlined in the phasing study would not result in any new or increased traffic impacts compared to those previously identified. (*Final Report for the Update to Southwest Dixon Specific Plan Mitigation Phasing Study, Fehr & Peers, 2019.*)

The SWDSP EIR generally contemplated the potential need for soil remediation. For instance, Impacts 3.8-B and 3.8-E of the SWDSP EIR identified five areas of the specific plan that could have contaminated soil, exposure to which could pose a safety hazard for workers and residents, and which could cause significant health risk to future residents if not remediated. Specifically, the SWDSP Draft EIR discussed that the plan area had been used for commercial agricultural production for many years, which use included the spraying of pesticides, herbicides, and other agricultural chemicals that could have left residues in the soil. This impact was considered potentially significant and triggered the adoption of mitigation measure requiring that a Phase I Environmental Site Assessment be conducted on all areas within the Specific Plan.

Other impact areas analyzed by the SWDSP EIR and relevant to the Modified Project (defined in Section 1.3) are detailed in Section 2.1.2, below.

1.3 MODIFIED PROJECT DESCRIPTION

The proposed remedy to remediate the Site is excavation and offsite disposal of the impacted soil. This approach includes the following elements:

- Excavation of an estimated 56,000 cubic yards of the top 12 inches of toxaphene-impacted soil;
- Stockpiling of the excavated soil on site for off haul;
- Transport of the soil to an appropriate permitted disposal facility; and
- Collection of confirmation soil samples across the excavation area and excavation sidewalls to verify the removal of toxaphene-impacted soil.

The remediation activities would be conducted between 7:00 a.m. and 6:00 p.m. Monday through Friday. Any work conducted on a Saturday or Sunday would be completed between 8:00 a.m. and 5:00 p.m., subject to the approval of the City. All remedial activities would be conducted by a California-licensed contractor under the supervision of a California-licensed professional geologist and/or civil engineer.

The excavated soil would be transported to Hay Road Landfill in Vacaville, approximately 11 miles south of the Site. The haul route would include the use of Pitt School Road, Midway Road, State Route 113, and Hay Road. A copy of the exact haul route to be used is attached as Appendix B, Transportation Plan, to the RAW, but is also shown in Figure 2, attached.

After all impacted soil has been removed from the Site, soil samples would be collected from across the excavation area in accordance with the Sampling and Analysis Plan contained in the RAW to verify the removal of all impacted soils has been completed. Sampling results would be returned within approximate five (5) working days. Clean soil would be imported from nearby land (within one-half mile) owned by the developer to restore grades at the Site to allow for the construction of homes.

The RAW requires the developer to apply to the City for a grading permit and hauling permit prior to the start of work, and to conduct the Project in accordance with all applicable local, state, and federal rules, including but not limited to, the Cal/OSHA regulations pertaining to worker protections, CEQA air quality guidelines, and the City's ordinances.

1.4 PURPOSE OF THE EIR ADDENDUM

According to CEQA Guidelines Section 15164(a), an addendum shall be prepared if changes or additions to a previously adopted EIR are necessary, but none of the conditions enumerated in CEQA Guidelines Sections 15162, subdivision (a)(1) through (3) calling for the preparation of a subsequent EIR have occurred. As stated in CEQA Guidelines Section 15162, subdivision (a):

When an EIR has been certified or negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or negative declaration was adopted, shows any of the following:
 - (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - (C) Mitigation Programs or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant

effects of the project, but the project proponents decline to adopt the mitigation Program or alternative; or

- (D) Mitigation Programs or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation Program or alternative.

1.5 Rationale for Preparing the EIR Addendum

As outlined in Section 2.0 below, the Modified Project will not result in any new significant impacts or increase in severity of impacts that would require an update to the SWDSP EIR. Further, as documented in the Fehr & Peers memo dated November 18, 2022, and updated on July 28, 2023, (see attached Exhibit A), the circumstances surrounding the Modified Project have not changed and would not result in the need to address any new significant environmental impacts related to traffic and transportation. Finally, the Modified Project would not result in the revelation of any new significant information which was not known or could not have been known at the time the EIR was prepared, which would require additional mitigation measures or alternatives be adopted.

As stated in CEQA Guidelines Section 15164 (Addendum to an EIR):

- (a) The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.
- (b) An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.
- (c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.
- (d) The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.
- (e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

A copy of this Addendum, the SWDSP EIR, and other supporting documentation, may be reviewed or obtained at the Department of Toxic Substances Control, 8800 Cal Center Drive, Sacramento, California 95826, or at the City of Dixon Community Development Department, 600 East A Street, Dixon, California, 95620 and the City's website at <https://www.cityofdixon.us/EnvironmentalReviewDocuments>.

2.0 CEQA Analysis

This Section analyzes and concludes that the modified project (implementation of the RAW) does not meet the criteria requiring preparation of a subsequent EIR as required under CEQA Guidelines Section 15164. This Section includes a summary of the environmental impact topics evaluated in the SWDSP Final EIR, and a determination as to whether the Modified Project would result in an increase in the severity of the impacts identified in the SWDSP EIR, or any new impacts not previously considered in the SWDSP EIR.

No substantial changes in circumstances have occurred and no new information of substantial importance has arisen since the SWDSP EIR and Addendum No. 1 were prepared.

Soil remediation of the Site was generally considered in the SWDSP EIR approved in 2005 and is fully consistent with the City's 2040 General Plan and General Plan EIR adopted in April 2022 (SCH 2018112035). The purpose of this Addendum is to provide details about and analysis of the proposed cleanup of the soil at the Site to ensure no new significant environmental impacts would result from the Modified Project.

Notably, this Modified Project is a component of the Southwest Dixon Specific Plan (Homestead Development), which remains unchanged and contains the same land uses, densities, unit counts, and commercial acreages as when originally approved. Additionally, there have been no major changes to the proposed land uses in the immediate vicinity of the SWDSP, as development within the City continues to occur consistent with the specific plans adopted in the early 2000's, and the City's 2040 General Plan. Thus, no new or changed impacts to aesthetics, agriculture and forestry, geology, land use and planning, mineral resources, population and housing, public services, parks and recreation, water, wastewater, or wildfire would result as part of the proposed soil excavation.

The environmental analysis below includes the potentially impacted resources and discusses how the existing SWDSP EIR or the Modified Project itself, mitigates any potentially significant impacts to a less than significant impact.

2.1. ENVIRONMENTAL SETTING

The Southwest Dixon Specific Plan area (Homestead) is bounded by West A Street to the north, Pitt School Road and South Lincoln Street to the east, agricultural land to the south and west. The specific plan area is approximately 35 percent built out, with all of the key infrastructure

improvements having been constructed throughout all phases, except Phase 4. Of the 1365 residential units proposed and entitled, approximately 450 single family homes have been constructed and are occupied as follows: Phase 1 (Villages 1-4) of the SWDSP has been completed and is fully occupied with single-family homes and various sized parks; Phase 2A (Villages 5-7) includes age-restricted single-family homes, a large detention pond, and a few small parks and is currently under construction; Phase 2B (Villages 9-10) have backbone infrastructure in, but no homes will be constructed until the end of 2024/beginning of 2025; Phase 3 (Villages 11) is nearing construction of single-family homes. The vacant parcels shown as Parcels B and C on the attached Phasing Boundaries Map in Figure 3 are proposed for two affordable housing apartment buildings – one for seniors and the other for families – with approximately 230 units in total. The commercial parcels (Parcels A, D, E and F) on the west of the specific plan area have not yet been developed. The proposed remediation activities would occur on unimproved land identified as Villages 12, 14 and 15 on the Phasing Boundaries Map in Figure 3.) The County areas to the south and west of the Site remain rural, while the areas to the north and east consist of existing single-family home neighborhoods.

2.2. ENVIRONMENTAL ANALYSIS

2.2.1. Air Quality

An air quality analysis under CEQA addresses concerns related to whether a project poses the risk of exceeding air quality limits for pollutants such as particulate matter (PM₁₀), nitrogen oxides (NO_x), reactive organic gases (ROGs), and other emissions like odors that might adversely affect a large number of individuals. Construction associated with the buildout of the SWDSP was analyzed in Impact 3.5-A of the SWDSP EIR and determined that such construction could potentially generate substantial emissions of ozone precursors (e.g., NO_x) as well as PM₁₀, which could contribute to local and regional air quality impacts. Mitigation Measure 3.5-A of the SWDSP EIR (Exhibit B) outlines measures to reduce construction impacts on air quality to a less than significant level and would apply to this Modified Project.

Air quality impacts of the soil excavation activities are not anticipated to exceed those associated with the buildout of the specific plan area and identified in the SWDSP EIR. This is because while the off haul of the soil would generate approximately 705 equivalent vehicle trips, this number is far below the 2,046 projected number of vehicle trips analyzed in the traffic analysis. (See Exhibit A.) Additionally, while the RAW identifies potential short-term risks to onsite workers, public health, and the environment due to exposure to dust or particulate matter generated during excavation and soil handling activities, as well as transport, the RAW includes mitigation measures in addition to those outlined in Mitigation Measure 3.5-A of the SWDSP EIR (Exhibit B) to reduce the impacts to less than significant. Specifically, the RAW contains two key documents to protect the public and workers. First, it includes a Community Air Monitoring Plan (CAMP) in Appendix A, which is focused on minimizing dust emissions and concentrations of constituents in fugitive dust during the removal activities at the Site. Second,

it includes a Health and Safety Plan (HSP) in Appendix E, which is focused on the occupational health and safety of the workers conducting the soil remediation. Each of these plans outlines the potential air quality impacts associated with the Modified Project and identifies various mitigation measures that must be implemented to reduce them. Each plan is discussed in detail below, and each is incorporated into this Addendum by this reference.

2.2.1.1. The Community Air Monitoring Plan (CAMP)

The CAMP can be found in Appendix A of the RAW. As previously noted, the CAMP is focused on minimizing dust emissions and concentrations of constituents in fugitive dust during the removal activities at the Site. Dust is most effectively controlled through watering the soil with a water truck, but various mitigation measures would be employed, including, but not limited to, track-out prevention and control, covering active storage piles, stabilizing inactive disturbed surfaces on Site, and limited onsite traffic speeds to 15 miles per hour or less.

The maximum potential exposure of toxaphene in the air is $1.85E^{-6}$ micrograms per cubic meter ($\mu\text{g}/\text{m}^3$). The cancer risk for toxaphene within the air concentration is $2.24E^{-10}$, which is below the acceptable risk level of $1E^{-6}$. As discussed in Appendix A, additional site-specific action limits have been established to protect onsite workers as well as offsite receptors from airborne particulate matter generated during the proposed removal activities.

2.2.1.2. The Health and Safety Plan (HSP)

The HSP can be found in Appendix E of the RAW. As previously noted, the HSP is focused on protecting the health of workers and protecting them from breathing in contaminated soils and toxic fumes during excavation and loading. For instance, all workers would be required to certify that they have undergone the requisite OSHA training. Additionally, if the Air Quality Index reaches above 151 (due to wildfires or otherwise), workers would be provided N95 masks for their protection or work would cease until conditions improve. Inhalation of dust above the Permissible Exposure Limit or PEL ($500 \mu/\text{m}^3$) are unlikely given the exposure concentrations of toxaphene would not exceed $1.85 \mu/\text{m}^3$ – well below the PEL. Similarly, fugitive dust emissions of PM_{10} at $0.050 \mu/\text{m}^3$ are below protective limits. As a result, respiratory protection is not required.

Pursuant to Section 6.0 of the HSP, dust monitors (i.e., TSI DustTrak II Aerosol Monitor, Thermo Scientific ADR 1500 Area Dust Monitor) would be used to measure real-time dust concentrations at one upwind and two downwind locations. The monitors would be mounted approximately five feet above the ground surface and would be equipped with data recorders and set to log dust concentrations at a one-minute logging interval. A portable meteorological station would be set upon site during air monitoring activities to measure wind speed and direction. This station would be used to determine the appropriate location of the air monitoring locations. Wind speed and direction would be measured hourly. Two days of baseline dust data would be

used to determine where the system would be located on site. All air quality instrumentation would be calibrated at the beginning of each workday, and weekly dust monitoring reports would be sent to the DTSC project manager for review.

Based on the detailed calculations provided in Section 7.0, and the combination of a conservative dust action level (50 µg/m³) and the use of the dust mitigation and control measures discussed above, the proposed removal action would not represent airborne risks to onsite workers or offsite receptors.

2.2.2. Biological Resources

Biological resources include wildlife and vegetation that inhabit the Site. These resources were studied in detail and mitigation applied to ensure full protection of them in the SWDSP EIR under Impact 3.3. In particular, the SWDSP EIR looked at how the development of the plan area could adversely impact sensitive wildlife species across the entire plan area, including the Site – mainly burrowing owl and Swainson’s hawk. As a result, Mitigation Measure 3.3-A 1 through 3 (Exhibit B) apply to the Modified Project. Measure 3.3-A.1 requires preconstruction surveys within one-quarter mile of any development of the Site where construction would occur between March 1 and August 15. If a Swainson’s hawk nest is located with one-quarter mile of the Site, seasonal construction restrictions may be necessary to eliminate the potential for noise disturbance to nesting hawks, as determined by a qualified biologist. Mitigation Measure 3.3-A.2 requires that for every acre developed, one acre of Swainson’s hawk habitat be placed into a conservation easement (or a fee paid), as outlined in Mitigation Measure 3.10-A (Exhibit B). The developer would pay the City’s agricultural mitigation fee for the 45-acre Site prior to commencement of the Modified Project. Currently, the fee is set at \$7,310.40 per acre. So, the total hawk mitigation fee paid by the developer would be \$328,968. Accordingly, this mitigation would be fully satisfied prior to commencement of construction and no impacts to wildlife resources would occur.

Because the Site has been actively farmed for decades, no sensitive plant species occur on site, and no mitigation for sensitive plant species is required.

2.2.3. Cultural Resources

Cultural resources include historic resources (i.e., old buildings, etc.) as well as archaeological resources such as human remains, pottery, etc. Any type of ground disturbance can affect cultural resources. Hence, if such resources are present at the Site, the Modified Project could have a potentially significant impact on them by damaging or destroying them. The SWDSP EIR contemplated such effects of development on such resources in Impact 3.19 (A-D) (Exhibit B) and proposed various mitigation measures. The proposed soil excavation would not have any additional impacts beyond those identified in the SWDSP EIR.

In this instance, there are no structures on the Site; therefore, there are no potentially historic structures to be protected. However, there could be archeological resources below ground, where

excavation would occur. The contractor would be required to comply with Mitigation Measure 3.19-B, which addresses artifacts encountered during project construction and provides that any work in the area must stop until a qualified archaeologist has evaluated the nature and significance of the find. It would also require that a qualified archeologist monitor subsequent excavations and spoils of any find for additional archaeological resources. If finds are made and deemed significant by the qualified archaeologist, s/he shall prepare a summary outlining the methods following, list and describe the resources recovered, map their exact locations and depths, and include any other pertinent information. Finally, the City must submit the report to the appropriate Information Center and the California state Historic Preservation Officer. As a result, any potentially significant impacts would be mitigated by compliance with Measure 3.19-B.

For impacts to Tribal Cultural Resources, see Section 2.2.10, below.

2.2.4. Geology/Soils

CEQA requires that a lead agency examine whether a project would directly or indirectly cause potential substantial adverse effects due to earthquakes, liquefaction, landslides or result in soil erosion. Soil erosion usually occurs during runoff from rainstorms, or where soils are left bare for extensive period of time.

Here, the Modified Project would not cause loss, injury, or death due to earthquakes, liquefaction, or landslides. The Health and Safety Plan attached as Appendix E to the RAW outlines safety procedures for workers if an earthquake were to occur. Finally, no landslides would occur because the Site is flat.

Additionally, the Modified Project would not result in substantial soil erosion or the loss of healthy topsoil because the Modified Project proposes to remove contaminated soil – for the benefit of the community and future residents - during the dry months. All stockpiled soil would be covered with one or more tarps until it can be transported offsite. All truckloads would be covered to prevent soil from leaving the dump trucks. Most importantly, new, non-contaminated topsoil would be imported to the Site from a neighboring property less than one-half mile away to bring the Site back up to grade.

Based on the foregoing facts and analysis, the Modified Project would not have a new or significant impact on geology or soils.

2.2.5. Greenhouse Gas Emissions

CEQA requires a lead agency to analyze whether a project would generate greenhouse gas emissions (directly or indirectly) that may have a significant impact on the environment, and whether a project would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Greenhouse gases (GHGs) are gases that trap heat in the atmosphere and affect the earth's temperature. Examples of GHGs include, but are not limited to, carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). (Cal. Code Regs., tit. 14, § 15364.5.) Carbon dioxide and nitrous oxide are byproducts of fossil fuel combustion; nitrous oxide is also associated with agricultural operations such as fertilization of crops. Transportation, however, accounts for 40 percent of the annual GHG emissions in California – approximately 170 metric tons of carbon dioxide equivalents (MTCO_{2e}). (GP EIR, p. 3.6-5.) In Dixon (as of 2018), energy usage was the largest GHG contributor at 44.5 percent or 96,203 MTCO_{2e}, and mobile sources (i.e., cars and trucks) contributed 33 percent of the GHG emissions or 71,383 MTCO_{2e}. (GP EIR, Table 3.6-3.)

The SWDSP EIR does not contain a GHG analysis, however, the City's 2040 General Plan EIR certified on May 20, 2021 (SCH No. 2018112035) (GP EIR) does. The City's General Plan EIR discusses GHGs impacts of construction for the General Plan buildout in Chapter 3.6. Impact 3.6-1 and found the impacts to be significant and unavoidable. Similarly, Impact 3.6-2 analyzes whether the buildout of the plan area would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions. Because the Homestead Project is consistent with and is included as a planning area in the General Plan, the Modified Project is specifically covered by the analysis therein. The Modified Project would fully comply with the Yolo Solano County Air District's requirements for construction equipment. Also, as shown in the traffic analysis, the Modified Project would not add any new vehicle trips above and beyond those already contemplated by the Homestead Project. Because the Project's GHG impacts would be limited to fuel emissions from construction and transport equipment, and because those emission would be below those already anticipated in the trip analysis, no new or increased significant GHG impacts need be analyzed.

2.2.6. Hazards and Hazardous Materials

The RAW's project activities raise new issues as to how to protect workers and the community from hazards such as equipment leaks and avoiding ingestion or inhalation of soil with elevated levels of toxaphene during the cleanup. The SWDSP EIR studied the impacts of hazards/hazardous materials related to the historic use of agricultural chemicals on the Site and the surrounding areas in Impact 3.8-B and 3.8-E (Exhibit B), finding that there were potentially significant impacts to soil and groundwater from the use of organochlorine pesticides. Mitigation Measure 3.8-B required that a Phase I Environmental Site Assessment (ESA) of the plan area be conducted and evaluated for remediation as recommended by the ESA.

A Phase I ESA was prepared by Wallace-Kuhl & Associates in December 2017. Based on the results of the Phase I ESA, Wallace-Kuhl & Associates collected 346 soil samples from the Site and surrounding area in December 2017. Samples from within the agricultural areas of the Site and surrounding area were composited, 18 of which were retrieved from OU-3 East and analyzed for arsenic and organochlorine pesticides. Seven of the 18 composite samples taken

from OU-3 East exceeded the DTSC residential screening level for toxaphene in soil. Concentrations of toxaphene ranged from 460 micrograms per kilogram ($\mu\text{g}/\text{kg}$) to 580 $\mu\text{g}/\text{kg}$. Fourteen discrete samples taken from within OU-3 East had reported arsenic concentrations that exceeded the DTSC screening level for arsenic in residential soil. Arsenic concentrations ranged from 4.2 milligrams per a kilogram (mg/kg) to 7.6 mg/kg .

In a Report of Findings (ROF) finalized in June 2019, Tetra Tech concluded that although arsenic concentrations exceeded the DTSC screening level for residential soil, they are generally consistent with the expected background concentrations found within Solano County. The ROF also concluded that toxaphene in soil did not warrant remedial excavation based on results of a statistical evaluation which included both the Site (OU-3 East) and surrounding area. However, in November 2019 DTSC commented on Tetra Tech's findings that the statistical evaluation across the larger Site and surrounding area was not appropriate and should be conducted using smaller exposure units appropriate for the size of the lots in the planned residential development. DTSC also commented that multiple composite samples consisted of soil from different parcels with potentially different cultivation practices, creating the potential for composite results that is biased low for toxaphene.

ENGEO prepared a Preliminary Endangerment Assessment Equivalent report (PEA) dated March 2019 that evaluated OU-3 East and the surrounding areas. Based on identified data gaps, ENGEO prepared a Supplemental Site Investigation Work Plan for OU-3 East in January 2021, and investigation was performed on January 21, 2021. Because samples recovered exhibited elevated toxaphene concentrations, an additional 20 soil borings between 0 to 36 inches below the ground surface were advanced at the Site on February 26, 2021, and samples were collected and analyzed to ascertain the vertical extent of elevated toxaphene levels in soil. In July of 2021, ENGEO conducted step-out sampling in OU-3 East to further delineate the horizontal extent of elevated toxaphene levels in soil. ENGEO prepared a PEA specific to OU-3 East dated January 2022. ENGEO concluded and DTSC agreed that arsenic levels are within background concentration levels for the Solano County region (and thus do not require remediation), and that toxaphene levels exceed DTSC's residential screening level for soil. As a result, ENGEO recommended the development of the Removal Action Workplan for the Site.

As noted above, the RAW includes a Health and Safety Plan (HSP) which would mitigate any hazard/hazardous materials impacts of the soil remediation. For instance, Section 13.0 of the Plan outlines "Safety Procedures, Engineering Controls, and Work Practices." The HSP outlines general site rules, including engineering controls and work practices to minimize spills. The HSP details procedures for ensuring the Site is safely secured from public access, as well as communicating and resolving potential spills. Section 16.0 of the HSP identifies emergency response and contingency procedures, including but not limited to, procedures for site evacuation, as well as emergency alerting procedures for the surrounding community.

In addition to the HSP, the CAMP details dust control measures to minimize dust emissions and concentrations of toxaphene in fugitive dust during removal activities at the Site. The CAMP

identifies sources of emissions, sets specific action limits for dust, lists dust mitigation measures, addresses traffic control measures, and outlines contingency mitigation measures.

The proposed Modified Project – the RAW– would ensure soil containing levels of toxaphene exceeding DTSC’s residential screening level are excavated and removed from the Site. Thus, as discussed here and throughout this Addendum, no new significant impacts from hazards or hazardous materials would result from the Modified Project.

2.2.7. Hydrology/Water Quality

Toxaphene is not water or air soluble. Thus, impacts to groundwater and soil vapor are not likely. Furthermore, shallow groundwater has not been identified on the Site, and toxaphene does not affect subsurface soil gas. Additionally, there are no creeks, waterways, lakes, or suitable habitat on or near the Site; so, no exposure waterways are present for ecological receptors. Also, the soil excavation would occur on the Site during the dry, summer months to avoid any potential stormwater runoff. Finally, the Site would be brought back up to its current elevation with dirt imported from an adjacent parcel. Based on the foregoing, the Modified Project would not result in any new significant impacts to hydrology or water quality.

2.2.8. Noise

The SWDSP EIR analyzed noise impacts on surrounding sensitive receptors due construction, including construction traffic, in Impact 3.6-C (Exhibit B). The potentially significant noise impacts from construction were reduced to less than significant with various mitigation measures, which the Modified Project would implement. Such measures include limiting hours and days of operation, buffering operations from existing residential uses, installing mufflers on equipment, limiting idling time to less than five minutes, designating a noise disturbance coordinator, and routing construction traffic along major arterials, among others. (*Ibid.*) The RAW imposes these mitigation measures as well.

Specifically, remediation activities would occur Mondays through Fridays between 7:00 a.m. and 6:00 p.m. with rare exceptions. Any work conducted on a weekend day or a holiday would be required to be at least 500 feet away from any existing residences. While the excavation equipment would create noise and vibrations, such impacts are identical to those of standard construction and were previously contemplated by the SWDSP EIR. In addition, the Modified Project will occur over a limited period of time. Similarly, no new noise impacts due to truck trips would occur given the trip numbers are well below those anticipated for buildout of the plan area. Therefore, no additional noise impacts from construction operations, including construction traffic noise, on sensitive receptors would occur.

Additionally, noise emanating from heavy equipment such as excavators, backhoes, scrapers, loaders, and dump trucks used during the soil remediation may impact workers. To mitigate the noise impacts to workers, the equipment operators and any observers would be required to use hearing protection if decibels are expected to exceed 85 decibels.

Based on the foregoing analysis, no new noise impacts would occur due to the Modified Project. In addition, Mitigation Measure 3.6-C (Exhibit B) in the SWDSP EIR for the original project would be implemented for the soil excavation activities proposed.

2.2.9. Transportation/Circulation

The Modified Project's hauling activities are scheduled to last between 20 and 30 days and generate between 4,500 and 4,700 truck trips along the designated haul route. These truck trips are equivalent to around 705 vehicle trips. Additionally, all of the onsite roadway improvements required for the Homestead buildout, have been completed, including the expansion (and repaving) of Pitt School road to four lanes with a center median, the construction of West A Street to four lanes with a center median between Evans Road and Gateway Drive, the construction of two minor collector roads – Sunflower Way (formerly South Parkway) and South Lincoln Street), and the construction of Evans Road (a major collector road with between two and four lanes with a center median).

Offsite roadway improvements (and mitigation measures) including signalized intersections at West A Street and Pitt School Road and West A Street and Evans Road have been installed and are operative. New intersection improvements at West A Street and Gateway Drive include a three-way stop. Prior to issuance of the 900th residential building permit, traffic signals would be installed at the intersection. The intersections at West A Street and I-80 eastbound ramps also have stop signs; traffic signals would be installed prior to the issuance of the 900th residential building permit.

Fehr & Peers analyzed the required remediation truck trips and submitted a Memorandum (Exhibit A), concluding the number of trips generated by the Modified Project falls below the overall trip budget of 2,046 vehicles on the proposed haul route estimated for the buildout of the specific plan area. DTSC and engineer David Robinson of Fehr and Peers had meeting on September 7, 2023, to review the methodology and conclusions. DTSC concluded the proposed remedial activities would not trigger any new significant transportation or circulation impacts beyond those identified and analyzed in the EIR or the first addendum to the SWDSP EIR.

2.2.10. Tribal Cultural Resources

The Department of Toxic Substances Control's Office of Environmental Equity -Tribal Affairs requested a Sacred Lands File (SLF) and a Tribal contact listing for the SW Dixon Harvest Property Modified Project to the Native American Heritage Commission (NAHC) in April 2022. The contact

listing identified three Tribal governments traditionally and culturally affiliated with the Site and area of the Modified Project. Tribal engagement letters were extended to these Tribal governments making them aware of the Remedial Action Workplan for the Modified Project, allowing for an opportunity to express an interest in the Modified Project or ask any project related questions. The SLF search returned negative results. Upon follow up with the Tribal governments, no interest was expressed, nor did DTSC receive a request for government-to-government consultation.

The Yocha DeHe Wintun Nation (Tribe) and its ancestors traditionally occupied the Southwest Dixon Specific Plan area. Tribal cultural resources have been identified within Villages 1 and 3, and future unknown discoveries are distinctly possible. As a result, the Developer entered into a monitoring agreement with the Tribe in April 2020 to ensure the Developer could proceed with its development without unnecessary delay, as well as to ensure that any unanticipated cultural resource discoveries are addressed in an appropriate and respectful manner. The monitoring agreement would remain in place, and Developer would fund a tribal monitor for all ground-disturbing activities through completion of all ground-disturbing activities by Developer, including this soil excavation project. Accordingly, all tribal cultural resources have been addressed and the monitoring activities by the Tribe serve to mitigate any impacts to resources. The monitoring agreement is incorporated to this Addendum by reference and is available (excepting any confidential exhibits) at the City's offices.

2.2.11. Mandatory Findings of Significance

Based on the foregoing analyses, with the implementation of the mitigation measures identified throughout this Addendum and in the SWDSP EIR, the Modified Project would not substantially degrade the quality of the environment, substantially reduce the habitat of 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 a rare or endangered plant or animal, or eliminate important examples of the major period of California history or prehistory.

Furthermore, the cumulative impacts associated with the Modified Project would be less than significant in all environmental impact topic areas since the foregoing analysis in each of the subject areas in this Addendum indicates that none of these impacts would be substantially increased due to the Modified Project.

As a result, the Modified Project would not result in any additional significant adverse impacts specified in the Mandatory Findings of Significance or a substantial increase in the severity of the impacts identified in the SWDSP EIR.

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2.3 ADDENDUM CONCLUSION

Based on the forgoing analysis, DTSC has determined that the potential environmental impacts associated with the implementation of the Southwest Dixon Harvest Property, Operable Unit 3-East Removal Action Workplan have been analyzed and addressed in the Southwest Dixon Specific Plan EIR, the Fehr and Peers Homestead at Dixon – Truck Trip Analysis, and this Addendum and would not result in conditions outlined in State CEQA Guidelines Section 15162 that would require the preparation of a subsequent Environmental Impact Report.

3.0 Exhibits and Figures

Exhibit A – Fehr & Peers Truck Traffic Memorandum

Exhibit B – Southwest Dixon Specific Plan Final EIR Impact and Mitigation Summary

Figure 1 – Site Plan

Figure 2 – Haul Route

Figure 3 – Phasing Boundaries



MEMORANDUM

Date: November 18, 2022 (Updated July 28, 2023)
To: Anton Garcia, Taylor Builders, LLC
From: David B. Robinson, Fehr & Peers
Subject: Homestead at Dixon – Truck Trip Analysis

RS18-3633

INTRODUCTION

Fehr & Peers completed the review of truck generation associated with project site cleanup activities. The purpose of the analysis was to determine if the proposed cleanup activities would result in operations deficiencies beyond those identified in the transportation analysis conducted for the project. The following outlines the transportation analysis completed for Dixon Homestead, outlined roadway improvements completed to date, summarizes the proposed cleanup activities, and analyzes the potential impacts of the cleanup.

DIXON HOMESTEAD TRANSPORTATION ANALYSIS

The City of Dixon certified the Environmental Impact Report (EIR) for the Southwest Dixon Specific Plan in 2004 by Resolution 04-195 certifying the EIR. The City approved the 477-acre Southwest Dixon Specific Plan by Resolution 2005-217 in 2005.

In 2008, the City amended the Specific Plan to add 40.9 acres of land east of Pitt School Road and south of Southeast parkway, increasing the low-density residential acreages but leaving the total number of dwelling units unchanged.

In 2016, the City amended the Specific plan to designate a portion of the Specific Plan to RM-4 (multi-family residential).

In 2019, the City adopted an Addendum to the Southwest Dixon Specific Plan EIR that was necessary to address changed circumstances since certification of the EIR in 2004, including reduced traffic volume near the project compared to those measured in 2008. To support the addendum, a transportation phasing study (*Final Report For the Update to the Southwest Dixon Specific Pan Mitigation Phasing Study*, Fehr & Peers, 2019) was conducted to determine if the traffic volume changes would change the findings of the transportation analysis for the previous CEQA analysis. The Addendum determined that the changes in traffic mitigation documented in the phasing study would not result in any environmental impacts significant environmental effects or increase in the severity of previously identified significant impacts.

The phasing study identified the phasing/timing of roadway infrastructure improvements needed based on phased development of the Southwest Dixon Specific Plan, which is required by Mitigation Measure 3.4-A in the *Southwest Dixon Specific Plan EIR* (Leonard Charles & Associates, March 2003).

ROADWAY IMPROVEMENTS

Figure 1 summarizes the results of the phasing analysis, including the roadway improvement and dwelling unit trigger. **Table 1** summarizes the status of roadway improvements to accommodate project development, consistent with the phasing study. As summarized, all the required mitigation from the phasing study is either complete or ongoing. As identified on **Figure 1**, the completed intersection traffic signal improvements on West A Street were required prior to occupancy of 450 dwelling units.

Table 1 – Roadway Improvements		
Roadway Facility	Description	Status
Off-Site Mitigation		
West A Street/Pitt School Road	Traffic Signal	Complete
West A Street/Evans Road	Traffic Signal	Complete
West A Street/Gateway Drive	Traffic Signal (Coordinated System)	Ongoing
West A Street/I-80 EB Ramps	Traffic Signal (Coordinated System)	Ongoing
On-Site Improvements		
Pitt School Road	4 lanes with center median in Plan Area	Complete
West A Street (Evans Road to Gateway Drive)	4 lanes arterial with center median	Complete
Sunflower Way (formerly south parkway)	2-lane minor collector in Plan Area	Complete
South Lincoln Street	2-lane minor collector	Complete
Evans Road	Major Collector: 4 lanes with center median (West A to North Parkway) and 2 lanes with center median (North Parkway to Sunflower Way)	Complete

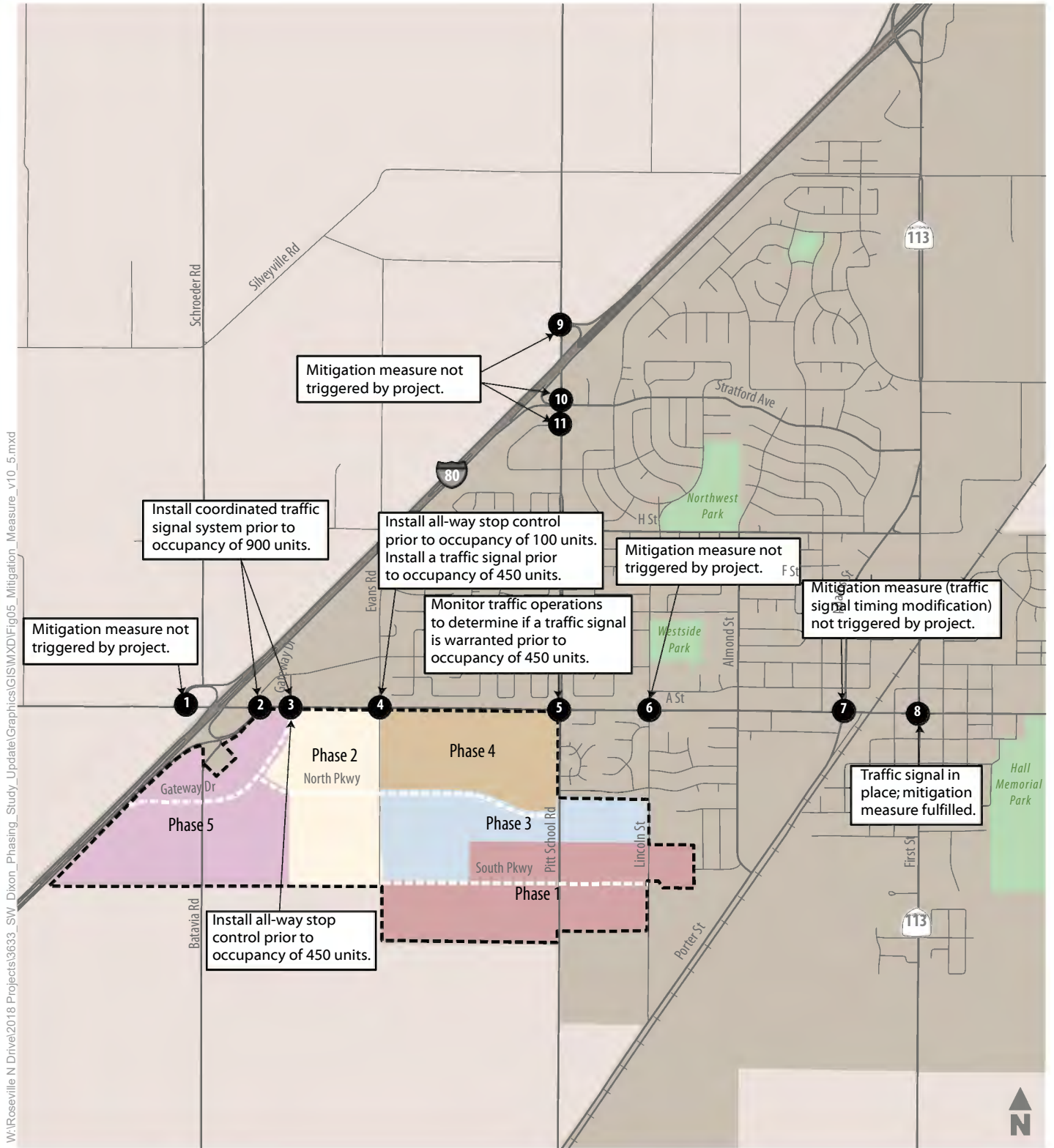


Figure 1
Mitigation Measure Phasing

PROPOSED CLEAN-UP ACTIVITIES

Cleanup activities are proposed to include removal of soil by truck and transporting for disposal between the project site (i.e., at the corner of West A Street and Pitt School Road) and the Hay Road Landfill in Vacaville. The landfill is located about 11.2 miles south of the project site. As proposed, the haul route would include use of Pitt School Road, Midway Road, SR 113, and Hay Road. Cleanup activities are scheduled to last between 20 and 30 days and generate about 4,500 to 4,700 trips.

ANALYSIS

We used the following seven steps to analyze the potential impacts associated with cleanup activities relative to the findings of the phasing analysis:

- 1 – Daily Cleanup Truck Trips – Estimated daily trip generation for proposed cleanup activities based on most conservative (i.e., on the high side) assumptions, including 4,700 trips and 20-day duration. Based on these inputs, cleanup activities would generate about 235 truck trips per day.
- 2 – Passenger Car Equivalent (PCE) – Converted truck trips to vehicle trips using a passenger car equivalent adjustment of 3.0 to account for the size of trucks relative to cars and light trucks.
- 3 – Project Haul Route Trip Distribution – Calculated the distribution of project traffic using the proposed haul route based on trip distributions from the phasing analysis for residential and non-residential land uses. Based on the phasing analysis, about 8% of project trips were assigned to Pitt School Road south of the project.
- 4 – Occupied Dwelling Unit Trips – Estimated the number of trips from occupied dwelling units in the project using the proposed haul route. There are about 450 occupied dwelling units. Based on the trip generation rates and trip distribution from the phasing analysis, occupied dwelling units account for about 191 trips per day on the proposed haul route.
- 5 – Phasing Analysis Trip Budget for Haul Route – Estimated the daily trip budget for the proposed haul route based on the phasing analysis after accounting for trips from occupied dwelling units. Calculation based on the total number of trips from the phasing analysis, the distribution from Step 3, and the trips from occupied dwelling units from Step 4. The trip budget for the haul route is estimated at 2,046.
- 6 – Cleanup Trips using Haul Route – Calculated haul route trips from cleanup activities by multiplying the daily cleanup trips from Step 1 by the PCE from Step 2. Applying a PCE of 3.0 would result in about 705 equivalent vehicle trips per day using the proposed haul route.
- 7 – Trip Comparison – Compared the haul route trips from Step 6 to the phasing analysis trip budget for the haul route from Step 5 to determine if the proposed cleanup activities would exceed the phasing analysis trip budget.

As outlined in Table 1, all the required mitigation from the phasing study is either complete or ongoing, including the installation of traffic signal control at the West A Street/Pitt School Road intersection that will be the primary intersection along the haul route used to access the project site. Therefore, we applied a trip budget based on project buildout to analyze the impact of the proposed cleanup activities.

The proposed cleanup activities would generate about 705 equivalent vehicle trips, which is lower than the trip budget of 2,046 for the proposed haul route that was used for the phasing analysis prepared to support the Addendum to the Southwest Dixon Specific Plan EIR. Therefore, the proposed cleanup activities would not change the findings of the phasing analysis or the Addendum to the Southwest Dixon Specific Plan EIR.

**FIGURE 2: HAY ROAD LANDFILL, VACAVILLE
HAUL ROUTE**

