Village Farms Davis Project

SCH# 2023110006

Partially Recirculated Draft Environmental Impact Report

Prepared for
City of Davis

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1. INTRODUCTION TO THE PARTIALLY RECIRCULATED DRAFT EIR

1.1 INTRODUCTION

This Partially Recirculated Draft Environmental Impact Report (EIR) is prepared in accordance with the California Environmental Quality Act of 1970 (CEQA), as amended. CEQA Guidelines §15088.5 requires the recirculation of some or all portions of a draft EIR when significant new information is added to the EIR after public notice is given. The City of Davis (City) is the lead agency for the environmental review of the proposed Village Farms Davis Project (the project) evaluated herein and has the principal responsibility for approving the project. At the time it is called upon to consider approving the project, the City Council of Davis, as the lead agency's decision-making body, shall consider the information in the EIR along with other information that may be presented to the City during the environmental review process and public hearing(s) on the project.

As explained in Section 1.2 below, the City determined that recirculation of portions of the Village Farms Davis EIR was necessary to comply with CEQA Guidelines Section 15088.5.

1.2 BACKGROUND

The EIR process began with the decision by the lead agency to release a Notice of Preparation (NOP) on October 24, 2023 for a 30-day review. In addition, a public scoping meeting was held on November 29, 2023 to receive verbal comments.

The City prepared and released the Draft EIR on January 7, 2025 for a 45-day public review period. In addition, the Draft EIR and a Notice of Availability (NOA) for the Draft EIR were published on the City of Davis website. The Draft EIR was made available for review online at https://www.cityofdavis.org/city-hall/community-development/development-projects/village-farms-davis and printed copies were made available for public review at the City of Davis Department of Community Development (23 Russell Boulevard, Suite 2, Davis). A public meeting was held before the Planning Commission on February 12, 2025 to solicit public comments regarding the Draft EIR.

The following environmental analysis chapters are contained in the Draft EIR:

- Aesthetics;
- Agricultural Resources;
- Air Quality, Greenhouse Gas Emissions, and Energy;
- Biological Resources;
- Cultural and Tribal Cultural Resources;
- Geology and Soils;
- Hazards and Hazardous Materials;

- Hydrology and Water Quality;
- Land Use and Planning;
- Noise;
- Population and Housing;
- Public Services and Recreation;
- Transportation;
- Utilities and Service Systems;
- Wildfire;
- Effects Not Found to be Significant;
- Statutorily Required Sections; and
- Alternatives Analysis.

The City received written and verbal comments on the Draft EIR during the public review period and is preparing written responses to all public comments in the form of a Final EIR.

Since release of the Draft EIR, Brown & Caldwell has completed preliminary assessment of the City of Davis' wastewater treatment plant (WWTP) capacity and tentatively confirmed that the WWTP may be at or nearing capacity for secondary treatment. This is contrary to the information provided in Chapter 4.14, Utilities and Service Systems, of the Draft EIR, which was based on the best available then-current information when the Draft EIR was being prepared by the City. As will be demonstrated in Chapter 2 of this Partially Recirculated Draft EIR, the discussion and analysis for Impacts 4.14-3 and 4.14-5 will need to be revised to reflect this information and change the significance conclusion concerning wastewater treatment capacity from less-than-significant to significant and unavoidable even after implementation of mitigation. Thus, a new significant impact has been identified in relation to the Proposed Project and Biological Resources Preservation Alternative (BRPA).

CEQA Guidelines Section 15088.5 provides four examples of disclosure which constitute "significant new information" for purposes of requiring recirculation of a revised EIR:

> (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented;
>
> (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance;
>
> (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it; or
>
> (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

Under subpart (1), the changes to the Draft EIR presented in this Partially Recirculated Draft EIR constitute "significant new information" pursuant to CEQA Guidelines Section 15088.5(a)(1).

1.3 PURPOSE OF THIS PARTIALLY RECIRCULATED DRAFT EIR

CEQA requires a lead agency to issue new notice and "recirculate" a revised EIR, or portions thereof, for additional commentary and consultation if, subsequent to the commencement of public review and interagency consultation but prior to final EIR certification, the lead agency adds "significant new information" to an EIR. (Pub. Resources Code, section 21092.1; CEQA Guidelines, section 15088.5; *Laurel Heights Improvement Association of San Francisco, Inc. v. Regents of the University of California* (1993) 6 Cal.4th 1112 (*Laurel Heights II*).)

The revised environmental document must be subjected to the same "critical evaluation that occurs in the draft stage," so that the public is not denied "an opportunity to test, assess, and evaluate the data and make an informed judgment as to the validity of the conclusions to be drawn therefrom." (*Sutter Sensible Planning, Inc. v. Board of Supervisors* (1981) 122 Cal.App.3d 813, 822; see also *Save Our Peninsula Committee v. Monterey County Bd. of Supervisors* (2001) 87 Cal.App.4th 99, 131.)

According to CEQA Guidelines Section 15088.5(c), if the revision to the EIR is limited to a few chapters or portions of the EIR, the lead agency need only recirculate the chapters or portions that have been modified. The City of Davis has identified the need to revise limited portions of the EIR to reflect the significant new information related to the City's wastewater treatment plant capacity.

This chapter presents revisions in ~~strike-through~~ and <u>double underline</u> format to portions of the following EIR chapters:

- Chapter 2 Executive Summary
- Chapter 4.14 Utilities and Service Systems
- Chapter 6 Statutorily Required Sections
- Chapter 7 Alternatives Analysis

This Partially Recirculated Draft EIR is being circulated for a 45-day review period, consistent with the time periods set forth in the CEQA Guidelines. The Draft EIR and Partially Recirculated Draft EIR and other project materials are now available for public review and download on the City of Davis website at: https://www.cityofdavis.org/city-hall/community-development/development-projects/village-farms-davis.

1.4 SUBMITTAL OF PUBLIC COMMENTS

Recirculation of an EIR requires notice pursuant to CEQA Guidelines section 15087, and consultation pursuant to section 15086. (CEQA Guidelines, section 15088.5, subd. (d).) Where an agency determines that recirculation is required, the agency can satisfy its obligation by reissuing only the revised part or parts of the EIR, rather than a whole new document. "If the revision is limited to a few chapters or portions of the EIR, the lead agency need only recirculate the chapters or portions that have been modified." (CEQA Guidelines, section 15088.5, subd. (c).)

Notably, the recirculation of only "portions" of a draft EIR does not permit commenters to comment anew on topics or text not subject to a partial recirculation. CEQA Guidelines Section 15088.5, subdivision (f)(2), provides:

> When the EIR is revised only in part and the lead agency is recirculating only the revised chapters or portions of the EIR, the lead agency may request that reviewers limit their comments to the revised chapters or portions of the recirculated EIR. The lead agency need only respond to (i) comments received during the initial circulation period[s] that relate to chapters or portions of the document that were not revised and recirculated, and (ii) comments received during the recirculation period that relate to the chapters or portions of the earlier EIR that were revised and recirculated. The lead agency's request that reviewers limit the scope of their comments shall be included either within the text of the revised EIR or by an attachment to the revised EIR.

Pursuant to this provision, the City of Davis directs that public comments must be restricted to the newly circulated information contained in this document related to wastewater treatment capacity.

The City is not obligated to respond to any new comments that are directed to the portions of the Draft EIR that were not revised and are not being recirculated in this document. The Final EIR for the project will contain detailed responses to comments made on the original Draft EIR and it will also include responses to comments on the Partially Recirculated Draft EIR that are properly limited to the subject of wastewater treatment capacity.

1.5 ORGANIZATION OF THE PARTIALLY RECIRCULATED DRAFT EIR

This Partially Recirculated Draft EIR is organized as follows:

Chapter 1 – Introduction to the Partially Recirculated Draft EIR

Provides an introduction, background, and describes the layout and intended use of the Partially Recirculated Draft EIR and the review process.

Chapter 2 – Recirculated Portions of Village Farms Draft EIR

Contains a revised project-level and cumulative analysis of wastewater treatment capacity in the Utilities and Service Systems chapter (4.14) of the Draft EIR. Other chapters of the Draft EIR requiring changes to reflect the updated and revised wastewater treatment capacity analysis include Chapter 2, Executive Summary; Chapter 6, Statutorily Required Sections; and Chapter 7, Alternatives Analysis. Revisions are presented as new text double underlined and deleted text as ~~struck through~~.

2. Recirculated Portions of the Draft EIR

2. RECIRCULATED PORTIONS OF DRAFT EIR

2.1 INTRODUCTION

This chapter presents revisions in ~~strike-through~~ and <u>double underline</u> format to portions of the following EIR chapters:

- Chapter 2 Executive Summary
- Chapter 4.14 Utilities and Service Systems
- Chapter 6 Statutorily Required Sections
- Chapter 7 Alternatives Analysis

Given that only limited sections of each chapter require revisions, the City has elected to recirculate only those revised portions of each chapter rather than each chapter in its entirety. Therefore, this chapter presents all of the revised and recirculated portions of the Village Farms Davis Draft EIR.

2.2 RECIRCULATED PORTIONS OF DRAFT EIR

The following section presents those portions of four chapters of the Village Farms Davis Project Draft EIR that need to be revised to reflect the significant new information related to the City's wastewater treatment plant capacity.

<u>Chapter 2, Executive Summary</u>

Section 2.4, Summary of Project Alternatives, is hereby revised to reflect the changes needed to the summary of project alternatives as a result of the revised wastewater treatment capacity analysis:

<u>Lower Number of Units – Same Footprint Alternative</u>

The Lower Number of Units – Same Footprint Alternative, would consist of the development of 1,395 dwelling units, including 210 affordable housing units, on the same development footprint as the Proposed Project and BRPA, consistent with the applicant's original application for the Proposed Project. This represents 405 fewer units than currently proposed. In response to early feedback from the Davis City Council, the number of units was increased to a total of 1,800, which now represents the Proposed Project evaluated throughout the Draft EIR. Similar to the Proposed Project, the Lower Number of Units – Same Footprint Alternative would include the development of neighborhood services; public, semi-public, and educational uses; associated on-site roadway improvements; utility improvements; parks, open space, and greenbelts; and off-site improvements. Because the Lower Number of Units – Same Footprint Alternative would include development of the project site/BRPA site with the same proposed uses, all of the project objectives would be met. However, because the Alternative would result in the

development of fewer residential units, fewer affordable housing units would be provided, vehicle miles traveled (VMT) per capita would be increased, and a reduced amount of property tax revenue would be generated project Objectives 1, 2, and 7 would be met to a lesser degree than under the Proposed Project. The significant impacts that would be reduced under the Alternative are as follows:

- Be located on a geological unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse, or be located on expansive soil, as defined in Table 18-1B of the Uniform Building Code, creating substantial risks to life or property;
- Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (e.g., through projects in an undeveloped area or extension of major infrastructure) (remains significant and unavoidable);
- Cumulative unplanned population growth (remains significant and unavoidable);
- Conflict with a program, plan, ordinance, or policy addressing the circulation system, including pedestrian and bicycle facilities;
- Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit facilities and services (remains significant and unavoidable);
- Conflict with a program, plan, ordinance, or policy addressing the circulation system, including pedestrian and bicycle facilities, associated with cumulative development of the Proposed Project or the BRPA in combination with future buildout of the City of Davis; and
- Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit facilities and services, associated with cumulative development of the Proposed Project or the BRPA in combination with future buildout of the City of Davis (remains significant and unavoidable).
- Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments (remains significant and unavoidable); and
- Increase in demand for utilities and service systems associated with the proposed project, in combination with future buildout of the City of Davis General Plan (remains significant and unavoidable).

Though the abovementioned significant and unavoidable impacts would be reduced under the Lower Number of Units – Same Footprint Alternative, the impacts would remain significant and unavoidable. Overall, all other impacts would be similar under the Lower Number of Units – Same Footprint Alternative as compared to the Proposed Project, including the other identified significant and unavoidable impacts. Because residential density would decrease under the Lower Number of Units – Same Footprint Alternative, the significant and unavoidable impacts related to VMT would increase in severity.

Agricultural Resource Preservation Alternative

Similar to the buildout of the Proposed Project, under the Agricultural Resource Preservation Alternative, the same land uses would occur, but on a reduced development footprint that would avoid, to the extent feasible, conversion of on-site high-quality agricultural land with non-agricultural uses. Unlike the Proposed Project, the Agricultural Resource Preservation Alternative would not include buildout of the approximately 20.3-acre Heritage Oak Park and Educational Farm and would not include the development of the 470 RMD units within the Central Village and Parkside Village East. As such, the Agricultural Resource Preservation Alternative would include the development of a total of 1,330 residential units, 470 fewer than the Proposed Project and the BRPA, for a residential density of 8.53 dwelling units per acre (du/ac) (net). Pursuant to the California Department of Conservation Important Farmland Finder, the project site/BRPA site contains approximately 319.7 acres of Prime Farmland, 9.2 acres of Farmland of Statewide Importance, and 117.7 acres of Unique Farmland. The Agricultural Resource Preservation Alternative would alter the site plan to avoid approximately 102 acres on-site agricultural land designated Prime Farmland. The Alternative would satisfy Objective 6 to a greater extent than the Proposed Project. However, because the Agricultural Resource Preservation Alternative would include the development of fewer residential uses than the Proposed Project, the Alternative would not satisfy Objectives 1, 3, and 7 to the same extent as the Proposed Project. The significant impacts that would be reduced under the Alternative are as follows:

- Have a substantial adverse effect on a scenic vista (remains significant and unavoidable);
- Have a substantial adverse effect on a scenic vista or conflict with applicable zoning and other regulations governing scenic quality associated with development of the Proposed Project or Biological Resources Preservation Alternative in combination with future buildout of the City of Davis (remains significant and unavoidable);
- Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use or agricultural land as defined in the CKH Act (Government Code Section 56064) (remains significant and unavoidable);
- Involve changes in the existing environment which, due to their location or nature, could cumulatively result in loss of Farmland to non-agricultural use (remains significant and unavoidable);
- Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, or conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs during construction;
- Have a substantial adverse effect, either directly or through habitat modifications, on special-status plant species;
- Have a substantial adverse effect, either directly or through habitat modifications, on Crotch's bumble bee;
- Have a substantial adverse effect, either directly or through habitat modifications, on burrowing owl;
- Have a substantial adverse effect, either directly or through habitat modifications, on Swainson's hawk or white-tailed kite;

- Have a substantial adverse effect, either directly or through habitat modifications, on other nesting birds and raptors protected under the MBTA and CFGC;
- Have a substantial adverse effect, either directly or through habitat modifications, on special-status roosting bats;
- Have a substantial adverse effect, either directly or through habitat modifications, on American badger;
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, or have a substantial adverse effect on the environment by converting oak woodlands or impacting individual trees;
- Cause a substantial adverse change in the significance of a unique archaeological resource pursuant to CEQA Guidelines, Section 15064.5;
- Disturb any human remains, including those interred outside of dedicated cemeteries;
- Cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074;
- Be located on a geological unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse, or be located on expansive soil, as defined in Table 18-1B of the Uniform Building Code, creating substantial risks to life or property;
- Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment;
- Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality during construction;
- Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality during operations;
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; or create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows, or in flood hazard, tsunami, or seiche zone, risk release of pollutants due to project inundation;
- Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (e.g., through projects in an undeveloped area or extension of major infrastructure) (remains significant and unavoidable);
- Cumulative unplanned population growth (remains significant and unavoidable);
- Conflict with a program, plan, ordinance, or policy addressing the circulation system, including pedestrian and bicycle facilities;
- Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit facilities and services (remains significant and unavoidable);

- Conflict with a program, plan, ordinance, or policy addressing the circulation system, including pedestrian and bicycle facilities, associated with cumulative development of the Proposed Project or the BRPA in combination with future buildout of the City of Davis; and
- Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit facilities and services, associated with cumulative development of the Proposed Project or the BRPA in combination with future buildout of the City of Davis (remains significant and unavoidable).
- Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments (remains significant and unavoidable); and
- Increase in demand for utilities and service systems associated with the proposed project, in combination with future buildout of the City of Davis General Plan (remains significant and unavoidable).

Though the abovementioned significant and unavoidable impacts would be reduced under the Agricultural Resource Preservation Alternative, the associated mitigation measures would still be required, and the impacts would remain significant and unavoidable. Overall, the majority of other impacts would remain similar to the Proposed Project under the Agricultural Resource Preservation Alternative, including the identified other significant and unavoidable impacts. The significant and unavoidable impacts related to VMT would increase in severity under the Agricultural Resource Preservation Alternative due to reduced residential density.

Higher Number of Units – Same Footprint Alternative

Under the Higher Number of Units - Same Footprint Alternative, the same non-residential uses as the Proposed Project would be included. However, the Alternative would also include the additional development of 900 residences, for a total of 2,700 residential units. The 2,700-unit count was selected for the Alternative in order to reduce per capita VMT below both City and regional average VMT thresholds. As such, the residential density under the Alternative would increase to 13.78 du/ac, correlating to decreased impacts to Air Quality, GHG Emissions, and Transportation.

Because the Higher Number of Units – Same Footprint Alternative would include development of the project site/BRPA site with the same uses included in the Proposed Project, all project objectives would be met. Furthermore, because the Alternative would be developed at a higher density than the Proposed Project, the Higher Number of Units – Same Footprint Alternative would result in a greater reduction in VMT and would generate more property tax revenue for the City; thus, satisfying Project Objectives 1, 2, and 7 to a greater extent than the Proposed Project. The significant impacts that would be reduced under this alternative are as follows:

- Conflict with or obstruct implementation of the applicable air quality plan during project operation (remains significant and unavoidable);
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors) (remains significant and unavoidable);

- Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, or conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs during construction;
- Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, or conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs during operation (remains significant and unavoidable);
- Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) (significant and unavoidable eliminated); and
- Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) associated with cumulative development of the Proposed Project or the BRPA in combination with future buildout of the City of Davis (significant and unavoidable eliminated).

Though the majority of abovementioned impacts would be reduced under the Higher Number of Units – Same Footprint Alternative, the associated mitigation measures would still be required, and the impacts would remain significant and unavoidable. However, significant and unavoidable impacts related to VMT would be reduced to less than significant under the Alternative. Overall, the majority of other impacts would remain similar to the Proposed Project under the Higher Number of Units – Same Footprint Alternative, including the other identified significant and unavoidable impacts. Significant and unavoidable impacts related to population growth and utilities and service systems would be greater under the Alternative due to an increased number of residential units.

Environmentally Superior Alternative

An EIR is required to identify the Environmentally Superior Alternative from among the range of reasonable alternatives that are evaluated. Section 15126(e)(2) of the CEQA Guidelines requires that an Environmentally Superior Alternative be designated and states, “If the Environmentally Superior Alternative is the ‘no project’ Alternative, the EIR shall also identify an Environmentally Superior Alternative among the other alternatives.” The No Project (No Build) Alternative would be considered the Environmentally Superior Alternative, because the project site is assumed to remain in its current condition under the Alternative. Consequently, none of the impacts resulting from the Proposed Project would occur under the Alternative. However, The No Project (No Build) Alternative would not meet any of the project objectives.

As discussed in detail in the Alternatives Analysis chapter of this EIR and presented in Table 7-1 therein, the Higher Number of Units – Same Footprint Alternative would meet all project objectives, and would satisfy Project Objectives 1, 2, and 7 to a greater extent than the Proposed Project. In addition, the Higher Number of Units – Same Footprint Alternative would result in fewer impacts than the Proposed Project related to transportation; specifically, the significant and unavoidable project impact related to conflicting or being inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) would not occur under the Alternative. The Alternative would result in similar impacts as the Proposed Project related to Aesthetics, Agricultural Resources, Biological Resources, Cultural and Tribal Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, and Hydrology and Water Quality, whereas greater impacts could occur related to Population and Housing and Utilities and Service Systems, and fewer impacts could occur related to Air Quality, GHG Emissions, and Energy. Overall, the Higher Number of

Units – Same Footprint Alternative is the only alternative that eliminates the Proposed Project's significant and unavoidable VMT impact. Thus, Higher Number of Units – Same Footprint Alternative is considered the environmentally superior alternative.

Table 2-1, Summary of Impacts and Mitigation Measures, is hereby revised to change the significance conclusions of Impacts 4.14-3 and 4.14-5 in the Utilities and Service Systems chapter.

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
4.14 Utilities and Service Systems			
4.14-1 Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.	LS	*None required.*	N/A
4.14-2 Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, single dry, and multiple dry years.	LS	*None required.*	N/A
4.14-3 Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.	~~LS~~	~~*None required.*~~ *Proposed Project, Biological Resources Preservation Alternative* *4.14-3 Prior to issuance of any building permits, the project applicant shall pay the City's Wastewater Capacity Charges in effect at time of issuance.*	~~N/A~~SU
4.14-4 Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the	LS	*None required.*	N/A

Table 2-1
Summary of Impacts and Mitigation Measures

	Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
	attainment of solid waste reduction goals, or conflict with federal, State, and local management and reduction statutes and regulations related to solid waste.			
4.14-5	**Increase in demand for utilities and service systems associated with the Proposed Project, in combination with future buildout of the City of Davis General Plan.**	~~LS~~CC	~~*None required.*~~ *Proposed Project, Biological Resources Preservation Alternative* *4.14-5 Implement Mitigation Measure 4.14-3.*	~~N/A~~SU

Chapter 4.14, Utilities and Service Systems

Impacts 4.14-3 and 4.14-5 concerning wastewater treatment plant capacity are hereby revised as follows:

4.14-3 Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments. Based on the analysis below, even with implementation of mitigation, the impact is ~~less than~~ considered significant and unavoidable.

The following discussions evaluate the potential for the wastewater treatment provider to have adequate capacity to serve the Proposed Project or BRPA in addition to the provider's existing commitments. Because the Proposed Project and BRPA would both include development of 1,800 dwelling units, as well as neighborhood services and public, semi-public, and educational uses, the following evaluation applies to both development scenarios.

Proposed Project, Biological Resources Preservation Alternative

The WWTP Capacity Memorandum concluded that the City of Davis WWTP had an influent ADWF design target at or above 5.3 mgd available capacity, with the exception of the anaerobic digesters. The WWTP's anaerobic digesters were determined to have a slightly lower ADWF of 5.1 mgd. According to the WWTP Capacity Memorandum, City WWTP operations staff had raised concerns that the existing influent WWTP flows and loads may be approaching the capacity of the secondary treatment system. In July 2024, staff engaged consultants Brown & Caldwell to study the City's WWTP, evaluate the operational challenges experienced by the team, assess the overall constituent loads and capacity at the plant, and provide options for the City to consider to address these findings. Brown & Caldwell has recently completed preliminary assessment of the WWTP capacity and tentatively confirmed that the WWTP may be at or nearing capacity for secondary treatment (see Appendix A to this Partially Recirculated Draft EIR). As shown in Table 4.14-4, the maximum influent ADWF from the proposed project is estimated to be approximately 0.264 mgd. Based on these preliminary results, it appears probable that adequate capacity may not exist to accommodate the proposed project's wastewater.

~~As shown in Table 4.14-4, the maximum influent ADWF for Existing Plus Village Farms Davis Project is estimated to be 4.4 mgd, of which 0.264 mgd would be associated with the development of the Proposed Project or BRPA. Because the maximum influent ADWF of 4.4 mgd would not exceed the established ADWF capacity of 5.1 mgd, the WWTP Capacity Memorandum concluded that the City's WWTP would have sufficient capacity to accommodate flows generated by the Proposed Project or BRPA, as well as the City's existing commitments.~~

Based on the above, the Proposed Project and BRPA ~~w~~could ~~not~~ result in a determination by the wastewater treatment provider that adequate capacity to serve the project's projected demand in addition to the provider's existing commitments does not exist. Thus, a ***~~less-than-~~significant*** impact ~~w~~could occur.

Mitigation Measure(s)

~~*None required.*~~ The City is currently working with Brown & Caldwell to identify the range of engineering options available to provide additional treatment capacity at the WWTP. The costs for the necessary upgrades to the WWTP will also need to be identified, and likely, included in the City's Capital Improvement Program. Implementation of the following mitigation measure would require the applicant to pay its fair share towards future expansion of the WWTP, but because the costs for the necessary upgrades are not yet included in the City's CIP, the remaining funds necessary to guarantee completion of the upgrades are uncertain. As a result, the project's impact is considered *significant and unavoidable*.

4.14-3 Prior to issuance of any building permits, the project applicant shall pay the City's Wastewater Capacity Charges in effect at time of issuance.

4.14-5 Increase in demand for utilities and service systems associated with the Proposed Project or BRPA, in combination with future buildout of the City of Davis General Plan. Based on the analysis below, the cumulative impact, specifically related to WWTP capacity, is ~~*less than*~~ *significant*, and the project's incremental contribution could be cumulatively considerable.

The cumulative analysis in this EIR is based upon development of either the Proposed Project or the BRPA, in conjunction with buildout of the Davis General Plan planning area, as well as a list of present and probable future projects. In addition to the Proposed Project/BRPA, Shriners Property, a 234-acre residential subdivision project located north of the East Covell Boulevard/Alhambra Drive intersection, is currently under review by the City. Just west of Shriners Property, north of the East Covell Boulevard/Monarch Lane intersection, is the Palomino Place Project, which is proposed on a 25-acre site and would include single- and multi-family housing, as well as health and training facilities open to the public. Other development projects undergoing planning review are located in the southern portion of the City, including two new multi-family residential apartment buildings, a new commercial hotel building, and a 700-unit residential neighborhood located on the 46.9-acre site formerly known as the Nishi Housing Site. The Bretton Woods University Retirement Community project, located northwest of the West Covell Boulevard/Risling Place intersection, is currently under review by the City of Davis. Finally, the City of Davis previously approved the Davis

Innovation and Sustainability Campus (DiSC) 2022 Project, which was proposed for a 102-acre site (plus the 16.5-acre Mace Triangle property) located immediately to the east of Mace Boulevard and to the north of CR 32A, northeast of the City limits.

Because the Proposed Project and BRPA would both include development of 1,800 dwelling units, as well as neighborhood services and public, semi-public, and educational uses, the following evaluation applies to both development scenarios.

Proposed Project, Biological Resources Preservation Alternative

The following discussions provide an analysis of the contribution of the Proposed Project and BRPA to cumulative impacts associated with water supply, wastewater treatment, dry utilities, and solid waste within the City of Davis under cumulative conditions.

Water Supply

Cumulative development, in conjunction with the Proposed Project or BRPA, would result in increased demand for water supplies provided by the City. According to the Citywide WSA, the total projected water supply in a normal year would be 23,320 AFY and would be 15,260 AFY in single and multiple dry years from 2025 through 2045. Based on the demand in AFY presented in Table 4.14-4, the City is anticipated to have a surplus of water supplies in all water year types to accommodate buildout of the City's General Plan planning area and present and future probable projects, including the Proposed Project or BRPA.

In addition, new water infrastructure required as part of cumulative development within the City would be required to be designed and constructed in compliance with the applicable standards set forth in the City of Davis Public Works Design Standards. Compliance with the foregoing standards would ensure new water lines installed as part of buildout of the City of Davis are constructed in conformance with proper materials and sizing.

Based on the above, adequate water supply would be available to serve cumulative development within the City, in conjunction with the Proposed Project and BRPA, and a less-than-significant impact would occur.

Wastewater Treatment

With respect to wastewater, according to the WWTP Capacity Memorandum, cumulative development would result in increased demand for wastewater treatment services, with the ADWF flows under cumulative buildout conditions projected to be 4.9 mgd. The WWTP Capacity Memorandum also concluded that based on a 2022 capacity analysis prepared by West Yost, the City's WWTP facilities have available capacity at or above a 5.3 mgd influent ADWF design target, with the exception of the facility's anaerobic digesters, which have a firm capacity at a slightly lower ADWF of 5.1 mgd. While ~~T~~the WWTP Capacity Memorandum concluded that the City's WWTP facilities would have sufficient capacity to support flows and loads associated with cumulative

buildout of the City, more recent testing by Brown & Caldwell has provided preliminary evidence that the WWTP is likely at or nearing capacity for secondary treatment. As a result, the proposed project in combination with reasonably foreseeable development could result in a significant impact related to WWTP capacity, and the project's incremental contribution could be cumulatively considerable.

In addition, based on the results of the Wastewater Collection Memorandum for cumulative buildout conditions, the City identified four gravity sewer main segments where flows would exceed the applicable d/D ratio (see Table 4.14-8). However, the Wastewater Collection Memorandum concluded that the impacts to the gravity mains under the cumulative development scenario would be very slight and improvements to the City's wastewater conveyance system are not currently recommended, as sewer flows could be accommodated by the existing conveyance system.

Based on the above, adequate wastewater treatment services would not be available to serve cumulative development within the City of Davis, in conjunction with the Proposed Project or BRPA, and a less-than-significant impact would occur.

Electricity and Telecommunications Facilities

Environmental effects associated with the construction of new or expanded electricity and telecommunications facilities would primarily be project-specific, rather than cumulative. As noted under Impact 4.14-1, while development of the Proposed Project or BRPA would include new connections to existing infrastructure located in the project site/BRPA site vicinity, substantial extension of existing off-site electrical or telecommunications infrastructure would not be required. Therefore, the Proposed Project and BRPA would result in a less-than-significant cumulative impact related to construction of new or expanded electricity and telecommunications facilities.

Solid Waste

As previously discussed, according to CalRecycle, the Yolo County Central Landfill is anticipated to cease operations by 2124. Construction waste generated by development facilitated by buildout of the General Plan planning area would be required to comply with the applicable provisions of the CALGreen Code, which requires at least 65 percent diversion of construction waste for projects permitted after January 1, 2017. In addition, the Yolo County Central Landfill has a remaining capacity of 33,140,373 CY, or 68 percent of the total capacity. Considering the remaining capacity at the landfill to serve future development, adequate capacity would be available to serve cumulative development within the City, in conjunction with the Proposed Project or BRPA, and a less-than-significant cumulative impact would occur.

Conclusion

Based on the above, adequate water supply, wastewater collection capacity, electricity, telecommunication facilities, and landfill capacity would be available to serve cumulative development in conjunction with development of the

Proposed Project or BRPA. However, the Proposed Project or BRPA in combination with reasonably foreseeable development could have a significant cumulative impact to the City's WWTP capacity, and the Proposed Project's or BRPA's incremental contribution could be cumulatively considerable. ~~Therefore, a ***less-than-significant*** cumulative impact would occur.~~

Mitigation Measure(s)

~~*None required*.~~ As previously discussed, the City is currently working with Brown & Caldwell to identify the range of engineering options available to provide additional treatment capacity at the WWTP. The costs for the necessary upgrades to the WWTP will also need to be identified, and likely, included in the City's Capital Improvement Program. Implementation of the following mitigation measure would require the applicant to pay its fair share towards future expansion of the WWTP, and other reasonably foreseeable cumulative projects would be required to pay Wastewater Capacity Charges. However, the costs for the necessary upgrades are not yet included in the City's CIP, and thus, the remaining funds necessary to guarantee completion of the upgrades are uncertain. As a result, the project's incremental contribution is considered *significant and unavoidable*.

4.14-5 Implement Mitigation Measure 4.14-3.

Chapter 6, Statutorily Required Sections

The following portions of Section 6.2, Growth-Inducing Impacts, are hereby revised as follows:

Eliminate Obstacles to Population Growth

The elimination of either physical or regulatory obstacles to growth is considered to be a growth-inducing effect. A physical obstacle to growth typically involves the lack of public service infrastructure. The extension of public service infrastructure, including roadways, water mains, and sewer lines, into areas that are not currently provided with these services, would be expected to support new development. Similarly, the elimination or change to a regulatory obstacle, including existing growth and development policies, could result in new growth.

As discussed in Chapter 4.14, Utilities and Service Systems, of this EIR, the existing City of Davis water system would be utilized to connect new water lines to the Proposed Project/BRPA. In the immediate project vicinity, existing water lines would connect to new water lines that extend into the project site/BRPA site within the new on-site internal streets. From the new water lines, water service would be provided to each structure through new water laterals. Similarly, sanitary sewer service would be provided by the City of Davis through new connections to the existing sewer system in the site vicinity. However, as the City's WWTP may be at or nearing its available capacity, and the project would pay its fair share toward future expansion of the WWTP, the project could contribute toward eliminating obstacles to population growth.

The improved on-site water system would be sized to serve only the Proposed Project/BRPA, and would be financed by the project applicant. Consequently, the construction of on-site utilities infrastructure would not be anticipated to result in elimination of obstacles to population growth in the area.

The Proposed Project/BRPA would require approval from the Yolo Local Agency Formation Commission (LAFCo) of a combined Municipal Service Review, City of Davis SOI Amendment to incorporate the Urban Agricultural Transition Area (UATA) into the City's SOI, and annexation of the project site/BRPA site into the City of Davis service area to operate the on-site water and wastewater treatment systems. The site is bounded by the City of Davis boundary to the west, south, and east. Therefore, City of Davis would not need to extend existing water and sewer infrastructure through intervening unincorporated County lands where services are not currently provided. Upon annexation of the project site into the City limits, water service would be provided to the Proposed Project/BRPA by the City of Davis as described above. Doing so would have a negligible effect on growth, as new utility infrastructure would not be installed in any unincorporated lands surrounding the site or the City of Davis.

Because implementation of the aforementioned improvements would be developed to serve only the Proposed Project/BRPA, such improvements would not be considered to eliminate obstacles to growth in a manner that would encourage previously unplanned growth, with the possible exception of wastewater treatment capacity.

Affect Service Levels, Facility Capacity, or Infrastructure Demand

Increases in population that would occur as a result of a Proposed Project/BRPA may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental impacts. As discussed in Chapter 4.12, Public Services and Recreation, of this EIR, increased demands for public services, including fire and police protection services, attributable to the Proposed Project/BRPA would necessitate the construction of new or expanded facilities that could cause significant environmental impacts, including the dedication of a new fire station. However, both the Proposed Project and the BRPA include construction of a new fire station along the East Covell Boulevard. In addition, as discussed in Chapter 4.14, Utilities and Service Systems, of this EIR, although the Proposed Project/BRPA would include connection to the existing wastewater treatment and water supply facilities provided by the City of Davis, through compliance with all applicable federal, State, and City regulations, significant environmental impacts would not occur, with the exception of wastewater treatment capacity.

The landfill that would serve the Proposed Project/BRPA has adequate capacity to manage the solid waste generated as a result of the project, as described in Chapter 4.14, Utilities and Service Systems, of this EIR. Furthermore, mitigation measures set forth in Chapter 4.8, Hydrology and Water Quality, of this EIR would ensure that the Proposed Project/BRPA would not create or contribute runoff water that would exceed the capacity of the City's stormwater drainage systems. Therefore, the Proposed Project/BRPA would not increase population such that service levels, facility capacity, or infrastructure demand would require construction of new facilities that could cause significant environmental impacts, with the exception of wastewater treatment capacity.

Section 6.5, Significant and Unavoidable Impacts, is hereby revised to list two new significant and unavoidable impacts related to wastewater treatment plant capacity:

Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments. (Impact 4.14-3)

As discussed in Impact 4.14-3, Brown & Caldwell, under contract with the City of Davis, has recently completed preliminary assessment of the City's WWTP capacity and tentatively confirmed that the WWTP may be at or nearing capacity. As shown in Table 4.14-4, the maximum influent ADWF from the Proposed Project or BRPA is estimated to be approximately 0.264 mgd. As a result, adequate capacity may not exist to accommodate the Proposed Project's or BRPA's wastewater.

The City is currently working with Brown & Caldwell to identify the range of engineering options available to provide additional treatment capacity at the WWTP. The costs for the necessary upgrades to the WWTP will also need to be identified, and likely, included in the City's Capital Improvement Program. Implementation of Mitigation Measure 4.14-3 would require the applicant to pay its fair share towards future expansion of the WWTP, but because the costs for the necessary upgrades are not yet included in the City's CIP, the remaining funds necessary to guarantee completion of the upgrades are uncertain. As a result, the Proposed Project's and BRPA's impact is considered significant and unavoidable.

Increase in demand for utilities and service systems associated with the Proposed Project or BRPA, in combination with future buildout of the City of Davis General Plan. (Impact 4.14-5)

Cumulative development would result in increased demand for wastewater treatment services, with the ADWF flows under cumulative buildout conditions projected to be 4.9 mgd. Brown & Caldwell, under contract with the City of Davis, has recently completed preliminary assessment of the City's WWTP capacity and tentatively confirmed that the WWTP is likely at or nearing capacity. As a result, the Proposed Project or BRPA in combination with reasonably foreseeable development could result in a significant impact related to WWTP capacity, and the Proposed Project's and BRPA's incremental contribution could be cumulatively considerable. Implementation of Mitigation Measure 4.14-5 would require the applicant to pay its fair share towards future expansion of the WWTP capacity, and other reasonably foreseeable cumulative projects would be required to pay Wastewater Capacity Charges. However, the costs for the necessary upgrades are not yet included in the City's CIP, and thus, the remaining funds necessary to guarantee completion of the upgrades are uncertain. As a result, the Proposed Project's and BRPA's incremental contribution is considered significant and unavoidable.

Chapter 7, Alternatives Analysis

Section 7.2, Purpose of Alternatives, is hereby revised to list two new significant and unavoidable impacts related to wastewater treatment capacity.

Impacts Identified in the EIR

In addition to attaining the majority of project objectives, reasonable alternatives to the Proposed Project must be capable of reducing the magnitude of, or avoiding, identified significant environmental impacts of the Proposed Project. The significant but mitigable

and significant and unavoidable impacts identified in the EIR are presented in Table 7-1; the significant and unavoidable impacts identified in the EIR are also presented below.

- ***Aesthetics.*** The EIR determined that the Proposed Project would result in significant and unavoidable impacts related to having a substantial adverse effect on a scenic vista. The panoramic open space/agricultural views available on the project site, while not officially designated by the City as a scenic vista, can nevertheless be considered as such for purposes of CEQA analysis and in recognition of the General Plan EIR's treatment of the issue. Views of the existing scenic vista of the site, as well as the surrounding agricultural area to the northwest, would be substantially affected by the Proposed Project. In addition, the EIR determined that the Proposed Project would result in a cumulatively considerable and significant and unavoidable impact related to having a substantial adverse effect on a scenic vista associated with development of the Proposed Project in combination with future buildout of the City of Davis.

- ***Agricultural Resources.*** The EIR determined that the Proposed Project would result in significant and unavoidable impacts related to the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use or agricultural land as defined in the Cortese-Knox-Hertzberg Act (Government Code Section 56064), even with implementation of mitigation measures. In addition, even with implementation of mitigation, the EIR determined that the Proposed Project would result in a cumulatively considerable and significant and unavoidable impact related to involving changes in the existing environment which, due to their location or nature, could cumulatively result in loss of Farmland to non-agricultural use.

- ***Air Quality, GHG Emissions, and Energy.*** The EIR determined that the Proposed Project would result in significant and unavoidable impacts related to conflicting with or obstructing implementation of the applicable air quality plan during operation of the Proposed Project because the reactive organic gases (ROG) and respirable particulate matter (PM_{10}) emissions would be above the applicable Yolo-Solano Air Quality Management District (YSAQMD) thresholds of significance. Additionally, the EIR determined that, even with implementation of mitigation, the amount of ROG and PM_{10} emissions generated by the Proposed Project would result in a cumulatively considerable and significant and unavoidable net increase of a criteria pollutant for which the project region is in non-attainment under an applicable federal or State ambient air quality standard (AAQS). The EIR also determined that the Proposed Project would result in a cumulatively considerable and significant and unavoidable impact related to the generation of GHG emissions, either directly or indirectly, that may have a significant impact on the environment, or conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs during operation.

- ***Biological Resources.*** The EIR determined that, even with implementation of Mitigation Measures 4.4-15(a) through 4.4-15(c), the Proposed Project would result in a significant and unavoidable impact related to having a substantial adverse effect on State- or federally protected wetlands (including, but not limited

to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. In addition, the EIR concluded that a cumulatively considerable and significant and unavoidable impact would occur related to the cumulative loss of habitat for special-status species associated with the Proposed Project.

- ***Noise.*** The EIR determined that, even with the implementation of Mitigation Measure 4.10-1, the Proposed Project would result in a significant and unavoidable impact related to the generation of a substantial temporary increase in ambient noise levels during construction in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

- ***Population and Housing.*** The EIR determined that the Proposed Project would result in a significant and unavoidable impact related to inducing substantial unplanned population growth in an area, either directly or indirectly, because the increase in population resulting from the Proposed Project would not be within the range of growth projections assumed for the City of Davis. The EIR also concluded that impacts related to cumulative unplanned population growth would be cumulatively considerable and significant and unavoidable.

- ***Transportation.*** The EIR determined that the Proposed Project would result in a significant and unavoidable impact related to conflicting with a program, plan, ordinance, or policy addressing the circulation system, including transit facilities and services, even with the implementation of mitigation, because improvements that are necessary to improve transit service and facilities would require additional actions and implementation by Unitrans and Yolobus, and the specific improvements identified in the transit service and facilities plan and their efficacy are not known at this time. In addition, the EIR determined that the Proposed Project would result in a significant and unavoidable impact related to conflicting or being inconsistent with CEQA Guidelines Section 15064.3, subdivision (b), which is related to VMT. The EIR also determined that the foregoing impacts would also be cumulatively considerable and significant and unavoidable. Finally, the EIR determined that the Proposed Project would result in a cumulatively considerable and significant and unavoidable impact related to substantially increasing hazards due to geometric design features or incompatible uses (i.e., SR 113 and I-80 freeway off-ramp queueing).

- ***Utilities and Service Systems.*** The EIR determined that the City's WWTP may not have sufficient capacity to treat the proposed project's wastewater. Even with implementation of mitigation, which consists of the project's payment of fair share fees toward future expansion of the WWTP, the remaining funds necessary to guarantee completion of the upgrades are uncertain, and therefore, the project's impact is considered significant and unavoidable. The EIR also determined that the project in combination with reasonably foreseeable development could result in a significant cumulative impact to the City's WWTP, and the project's incremental contribution would be cumulative considerable and significant and unavoidable.

Section 7.3, Selection of Alternatives, is hereby revised to reflect the two new significant and unavoidable impacts related to wastewater treatment capacity and the comparison of these impacts with the Proposed Project.

No Project (No Build) Alternative

Utilities and Service Systems

The No Project (No Build) Alternative would not generate wastewater and, thus, would not result in the determination by the wastewater treatment provider (i.e., City of Davis) that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments. As such, Mitigation Measure 4.14-3 would not be required and the project's significant and unavoidable impact would not occur. Similarly, this Alternative would not result in a cumulatively considerable incremental contribution toward a significant cumulative WWTP capacity impact.

Lower Number of Units – Same Footprint Alternative

Utilities and Service Systems

The Alternative would consist of the development of 1,395 dwelling units, resulting in an overall reduction of 405 residential units as compared to the proposed project. Using the metrics in the WWTP Capacity Memorandum, this would equate to a reduction in wastewater flow by approximately 59,000 gallons per day, as compared to the proposed project. As a result, this Alternative could have a reduced impact on the City's WWTP capacity, though the impact could still be significant and unavoidable given the recent capacity analysis, suggesting that the WWTP may be at or nearing its capacity. Similarly, this Alternative's incremental contribution to the significant cumulative impact on the City's WWTP capacity could be reduced.

Overall, potential impacts related to Utilities and Service Systems could be fewer under the Lower Number of Units – Same Footprint Alternative as compared to the proposed project.

Agricultural Resource Preservation Alternative

Utilities and Service Systems

The Alternative would consist of the development of 1,330 dwelling units, resulting in an overall reduction of 470 residential units as compared to the proposed project. Using the metrics in the WWTP Capacity Memorandum, this would equate to a reduction in wastewater flow by approximately 69,000 gallons per day, as compared to the proposed project. As a result, this Alternative could have a reduced impact on the City's WWTP capacity, though the impact could still be significant and unavoidable given the recent capacity analysis, suggesting that the WWTP may be at or nearing its capacity. Similarly, this Alternative's incremental contribution to the significant cumulative impact on the City's WWTP capacity could be reduced.

Overall, potential impacts related to Utilities and Service Systems could be fewer under the Lower Number of Units – Same Footprint Alternative as compared to the proposed project.

Higher Number of Units – Same Footprint Alternative

Utilities and Service Systems

The Alternative would consist of the development of 2,700 dwelling units, resulting in an overall increase of 900 residential units as compared to the proposed project. Using the metrics in the WWTP Capacity Memorandum, this would equate to an increase in wastewater flow by approximately 132,000 gallons per day, as compared to the proposed project. As a result, this Alternative could have a greater impact on the City's WWTP capacity, and the impact could still be significant and unavoidable given the recent capacity analysis, suggesting that the WWTP may be at or nearing its capacity. Similarly, this Alternative's incremental contribution to the significant cumulative impact on the City's WWTP capacity could be greater.

Overall, potential impacts related to Utilities and Service Systems could be greater under the Lower Number of Units – Same Footprint Alternative as compared to the proposed project.

Off-Site Project Alternative

Utilities and Service Systems

The Alternative would consist of the development of same number of dwelling units and other uses as the Proposed Project, but at a different project site. As a result, this Alternative would generate an equivalent amount of wastewater as the Proposed Project. Given the recent capacity analysis, suggesting that the WWTP may be at or nearing its capacity, this Alternative, similar to the Proposed Project, could have a significant and unavoidable impact to the City's WWTP capacity. Similarly, this Alternative's incremental contribution to the significant cumulative impact on the City's WWTP capacity would be the same.

Overall, potential impacts related to Utilities and Service Systems could be similar under the Off-Site Project Alternative as compared to the Proposed Project.

Section 7.4, Environmentally Superior Alternative, is hereby revised to reflect the new significant impact for wastewater treatment capacity, and correspondingly update Table 7-1 of Chapter 7, Comparison of Significant Environmental Impacts for Project Alternatives.

An EIR is required to identify the environmentally superior alternative from among the range of reasonable alternatives that are evaluated. The environmentally superior alternative is generally the alternative that would be expected to generate the least number of significant impacts. However, the lead agency may consider certain issue areas as a higher priority than others. For the purposes of this EIR, reduction of impacts related to VMT are considered a high priority due to the potential consequences of climate change for the City of Davis. As discussed in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of this EIR, according to the Climate Change Vulnerability Assessment conducted as part of the City's CAAP, like much of California, the City is already experiencing impacts from extreme heat events, flooding and extreme precipitation, drought and poor air quality caused by wildfire smoke. The Climate Change Vulnerability Assessment identified how such impacts are likely to change through mid-century and end-of-century timeframes. Specifically, projected changes include an increase in the

number of extreme heat days, increased wildfire frequency and intensity, more intense precipitation events, and more frequent and/or prolonged droughts. Consequently, on March 5, 2019, the Davis City Council adopted a resolution declaring a climate emergency, which proposed a regional mobilization effort to reduce the effects of climate change. As part of the regional mobilization effort, the resolution accelerated the City's previously stated goal of achieving carbon neutrality by the year 2050 to a new carbon neutrality target date of 2040.

Identification of the environmentally superior alternative is an informational procedure and the alternative selected may not be the alternative that best meets the goals or needs of the City. Section 15126(e)(2) of the CEQA Guidelines requires that an environmentally superior alternative be designated and states, "If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." In this case, the No Project (No Build) Alternative would be considered the environmentally superior alternative, because the project site is assumed to remain in its current condition under the alternative. Consequently, as shown in Table 7-1 below, the No Project (No Build) Alternative would result in no impacts related to the majority of the resources areas where potentially significant and/or significant and unavoidable impacts were identified for the Proposed Project, and fewer impacts than the Proposed Project related to the ~~three~~ other resources areas where potentially significant and/or significant and unavoidable impacts were identified for the Proposed Project. However, the No Project (No Build) Alternative would not meet any of the project objectives, and thus, an environmentally superior alternative among the other alternatives must be identified pursuant to CEQA.

Apart from the No Project (No Build) Alternative, the Higher Number of Units – Same Footprint Alternative would meet all project objectives, and would satisfy Project Objectives 1, 2, and 7 to a greater extent than the Proposed Project. In addition, as discussed above and shown in Table 7-1, the Higher Number of Units – Same Footprint Alternative would result in fewer impacts than the Proposed Project related to Transportation; specifically, the significant and unavoidable VMT impact (project-level and cumulative) related to conflicting or being inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) would not occur under the Alternative. The Alternative would result in similar impacts as the Proposed Project related to Agricultural Resources, Biological Resources, Cultural and Tribal Cultural Resources, Hazards and Hazardous Materials, Hydrology and Water Quality, and Noise, whereas greater impacts could occur related to Aesthetics, Geology and Soils, ~~and~~ Population and Housing<u>, and Utilities and Service Systems</u>. It is noted that the temporary significant and unavoidable construction impact related to Noise and the significant and unavoidable ~~wetland~~ impacts related to Biological Resources <u>and Utilities and Service Systems</u> identified for the Proposed Project would still occur under the Alternative. In addition, as previously discussed, due to the reduction in VMT associated with the Alternative, a reduction would occur in emissions of criteria pollutants and GHGs, and fewer impacts could occur related to Air Quality, Greenhouse Gas Emissions, and Energy. Overall, the Higher Number of Units – Same Footprint Alternative is the only alternative that eliminates the Proposed Project's significant and unavoidable VMT impacts. Thus, Higher Number of Units – Same Footprint Alternative is considered the environmentally superior alternative.

Table 7-1
Comparison of Significant Environmental Impacts for Project Alternatives

Impact	Proposed Project	Biological Resources Preservation Alternative	No Project (No Build) Alternative	Lower Number of Units – Same Footprint Alternative	Agricultural Resource Preservation Alternative	Higher Number of Units – Same Footprint Alternative	Off-Site Project Alternative
4.14 Utilities and Service Systems							
4.14-3 Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.	Significant and Unavoidable	Similar*	None	Fewer*	Fewer*	Greater*	Similar*
4.14-5 Increase in demand for utilities and service systems associated with the proposed project, in combination with future buildout of the City of Davis General Plan.	Cumulatively Considerable and Significant and Unavoidable	Similar*	None	Fewer*	Fewer*	Greater*	Similar*

Appendix A

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November 7, 2025

Letter Report

Stan Gryczko
Assistant City Manager
City of Davis
1717 5th Street
Davis, CA 95616

203659

Subject: Capacity Analysis Evaluation Interim Findings

Dear Mr. Gryczko:

As part of our Capacity Analysis evaluation, Brown and Caldwell (BC) has reviewed previous reports by others, including:

- 2018 As-built drawings (AECOM and W.M. Lyles Co.)
- 2022 Davis Wastewater Treatment Plant (WWTP) Capacity Analysis Report (West Yost)
- 2025 Impacts of Landfill Leachate to WWTP Influent Flows and Loads Technical Memorandum (West Yost)

At your request, this letter summarizes differences in key assumptions compared to previous capacity studies and provides preliminary information on the capacity implications. BC's full capacity evaluation results will be documented in a future report.

Changes to Influent Flow and Loadings

Plant capacity is rated in terms of average dry weather flow (ADWF), but capacity limitations typically occur:

- During peak flow events for preliminary treatment, primary treatment, secondary clarifiers, and filtration
- During peak loading events (over 2 to 4 weeks) for aeration basins and solids handling processes including anaerobic digestion

Flow and loading projections are used to translate the peak flow or loading capacity into an ADWF. For the City of Davis (City), the capacity limitations are related to peak loading.

Water conservation reduces the flow per person but does not significantly impact the amount of organic loading produced per person. As a result, many California plants have seen changes in the relation between ADWF and peak loading, resulting in reduced ADWF capacity. The Davis WWTP was designed for an ADWF of 6 million gallons per day (mgd). The rated capacity was reduced to 5.3 mgd in the 2022 Capacity Analysis Report for most processes and 5.1 mgd for anaerobic digestion. The reduced flow capacity was due to water conservation (same population, similar loading, but lower flow).

Table 1 compares the rated capacity to the current flow and loading projections. Plant influent biochemical oxygen demand (BOD) loadings exceeded design loading capacity in the spring of 2023; according to City staff this period had high groundwater intrusion and impacts of leachate. Assuming peak loadings similar to this would occur in the future, West Yost noted in the 2025 flow and loading projections that there may be no organic loading capacity available at the WWTP to accommodate any future population growth.

Table-1. Influent Flow and Loading Changes

Parameter	2022 Capacity Analysis Report Revised Design Target	2025 Flow and Load Projections, Current	BC Estimate of Current Loading (Preliminary)[a]
Population	85,700	65,100	65,100
ADWF, mgd	5.3	4.1	4.1
Maximum Month BOD, lb/day[b]	13,300	15,800	12,000
Max Month BOD Loading During Maintenance Period, lb/day[c]	12,200	11,000	10,200

a. *Plant experienced extreme loadings between 12/1/2023 and 5/13/2023, likely due to high ground water intrusion and impacts of leachate. City staff assume this event will be prevented from occurring again, so the BC estimate excludes this time period.*
b. *BOD is shown as a parameter representative of organic loading. The full evaluation will include other influent parameters (TSS, ammonia).*
c. *Maintenance period is used to confirm capacity with process units out of service. Maintenance is assumed to take place during the non-student period (June 15 to September 15).*

lb/d = pound(s) per day

For comparison, BC estimated loadings excluding the spring of 2023, assuming leachate return is controlled to prevent future extreme peaks. Assuming leachate return is controlled so extreme peak loadings do not occur, the current influent loadings are less than the design loadings.

Plant Operational Assumptions

Several operational assumptions have changed since the original design, resulting in reduced plant capacity:

- **Reduction in Aeration Basin Aerated Volume.** The design capacity assumed the swing zone and final aerobic zone were aerated, but plant staff have reported operational issues when these zones are aerated. This reduces the aerobic volume by about 25 percent, reducing aeration basin capacity by providing less volume to transfer oxygen needed for treatment.
- **Changes in Aeration Basin Dissolved Oxygen (DO).** The plant staff have found that optimal DO setpoints use higher DO in the early zones and lower DO in later zones compared to the original design. Diffusers in the early zones do not have sufficient capacity, further reducing basin capacity.

- **Effluent Ammonia Target.** The plant was designed to have spikes of ammonia up to 3.6 milligrams per liter (mg/L) during peak loading conditions each day. This is allowable based on the discharge permit ammonia limit, but the varying ammonia concentrations cause issues for chlorination. To maintain consistent chlorination, the plant targets 1 mg/L of ammonia. The modified DO setpoints are needed to meet this ammonia target.
- **Anaerobic Digester Operations.** The original design had capacity to take a digester out of service at average loadings, assuming a primary sludge thickness of 4 percent. Actual primary sludge thicknesses are lower, reducing digester capacity. In addition, the maximum month loadings during the maintenance period exceed average loadings. The plant has capacity with both digesters in service, but capacity is limited for the maintenance condition.

The first three items reduce the aeration basin capacity to below current loadings. Preliminary capacity results are consistent with plant performance during a stressed period in October 2024 when one aeration basin was out of service, during which the plant struggled to maintain DO concentrations due to diffuser limitations. The preliminary capacity evaluations indicate that the plant will need additional aeration basin capacity and additional digester capacity to accommodate increased loadings.

Temporary Options to Address Capacity Limitations

BC is evaluating several temporary options to accommodate additional capacity while long-term improvements are constructed:

- **Reduce Leachate.** Leachate return was high during the spring of 2023. Controlling the return of leachate can help address capacity limitations.
- **Chemically enhanced primary treatment (CEPT).** By adding ferric chloride and polymer during high loading periods, primary treatment performance can be improved, allowing the plant to treat a higher influent loading without overloading the aeration basins. Jar testing and full-scale testing of CEPT performance can confirm the capacity increase. Because of the cost and challenges of relying on chemicals, this is not recommended as a long-term option.
- **Aerate swing zone.** Although aerating the swing zone presents challenges to operations, the plant aerated the swing zone during the peak loading in the spring of 2023. Aerating the swing zone temporarily to reduce ammonia during high loading periods helps the plant accommodate additional capacity. This may not be a solution long-term, especially if the plant receives nitrate limits in a future discharge permit.
- **CEPT and aerate swing zone.** These can be combined to further increase capacity.
- **Operate both digesters.** Capacity is sufficient with both digesters in service, but in five to seven years the digesters will need to be taken out of service for maintenance.
- **Thicken primary sludge.** If a digester needs to be out of service, thickening primary sludge will reduce the flow to the digester and increase digester capacity.

Permanent Options to Address Capacity Limitations

There are a variety of options to address aeration basin capacity limitations, including construction of additional basins. Once new basins are constructed, addition of baffles and mixers to the existing basins will help maximize capacity of the existing basins, diffusers, and blowers.

Intensification of the existing basins could also be considered, although the limited time each summer available for basin maintenance may make it impossible to modify the existing basins. Blower capacity limitations likely necessitate another blower if the process is intensified.

Addition of primary effluent equalization would reduce the diurnal peaks in loading and increase aeration basin capacity.

Summary of Findings

Based on the current flows and loadings and the plant operational configuration for optimized operations, the City plant has limited or no capacity for additional loading. Temporary options are available to address capacity limitations while permanent options are being implemented.

BC looks forward to the opportunity to complete the Capacity Evaluation Report. Should you have any questions, please do not hesitate to call me at 925-210-2551.

Very truly yours,

Brown and Caldwell

Fran Burlingham

Fran Burlingham, Project Manager
Walnut Creek

Limitations:

This document was prepared solely for the City of Davis in accordance with professional standards at the time the services were performed and in accordance with the contract between the City of Davis and Brown and Caldwell dated August 8, 2024. This document is governed by the specific scope of work authorized by City of Davis; it is not intended to be relied upon by any other party except for regulatory authorities contemplated by the scope of work. We have relied on information or instructions provided by the City of Davis and other parties and, unless otherwise expressly indicated, have made no independent investigation as to the validity, completeness, or accuracy of such information.