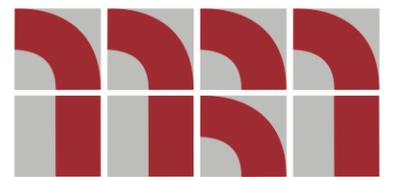


Final Environmental Impact Report Solano360 Specific Plan State Clearinghouse No: 2011092067



Michael Brandman Associates
2000 "O" Street, Suite 200
Sacramento, CA 95811

FINAL
Environmental Impact Report
Solano360 Specific Plan
County of Solano, California

State Clearinghouse No. 2011092067

Prepared for:



County of Solano

Solano County Government Center
675 Texas Street, Fairfield, CA 94533
707.784.3002

Contact: Michelle Heppner, Legislative, Intergovernmental and Public Affairs Officer

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Michael Brandman Associates

February 15, 2013

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SECTION 1: INTRODUCTION

In accordance with the California Environmental Quality Act (CEQA) Guidelines Section 15088, the County of Solano, as the lead agency, has evaluated the comments received on the Solano360 Specific Plan Project. The responses to the comments and other documents, which are included in this document, together with the Mitigation Monitoring and Reporting Program, comprise the Final Environmental Impact Report (Final EIR) for use by the County of Solano in its review.

This document is organized into these sections:

- **Section 1 - Introduction.**
- **Section 2 - Responses to Written Comments on the Draft EIR:** Provides a list of the agencies, organizations, businesses, and individuals that commented on the Draft EIR. Copies of all of the letters received regarding the Draft EIR and responses thereto are included in this section.
- **Section 3 - Errata:** Includes an addendum listing refinements and clarifications on the Draft EIR, which have been incorporated.

Because of its length, the text of the Draft EIR is not included with these written responses; however, it is included by reference in this Final EIR. None of the corrections or clarifications to the Draft EIR identified in this document constitutes “significant new information” pursuant to CEQA Guidelines Section 15088.5. As a result, a recirculation of the Draft EIR is not required.

The Final EIR includes the following contents.

- Draft EIR (provided under a separate cover).
- Draft EIR appendices (provided under a separate cover).
- Responses to Written Comments on the Draft EIR and Errata (Sections 2 and 3 of this document).
- Mitigation Monitoring and Reporting Program (provided under a separate cover).

SECTION 2: RESPONSES TO WRITTEN COMMENTS

A list of public agencies, organizations, and individuals who provided comments on the Draft EIR is presented below. Each comment has been assigned a code. Individual comments within each communication have been numbered so comments can be cross-referenced with responses. Following this list, the text of the communication is reprinted and followed by the corresponding response.

Author	Author Code
State Agencies	
California Department of Transportation	CALTRANS
California Department of Fish and Game	DFG ¹
Local Agencies	
Vallejo Sanitation and Flood Control District.....	VSFCD
Organizations	
Knudson Engineers & Constructors, Inc.	KEC
Western “Parkview”	WPN
Individuals	
Amanda Cundiff	CUN
Julie Charles	CHA
Doug Darling	DOUG
Kim Geddes	GED
Shirley Larsen.....	LAR
Dan Levin	LEV
Ima Roscoe	ROS
Mónica Hutchens Tipton	TIP

2.1 - Responses to Comments

2.1.1 - Introduction

In accordance with the California Environmental Quality Act (CEQA) Guidelines Section 15088, the County of Solano, as the lead agency, evaluated the comments received on the Draft EIR (State Clearinghouse No. 2011092067) for the Solano360 Specific Plan, and has prepared the following responses to the comments received. This Response to Comments document becomes part of the Final EIR for the project in accordance with CEQA Guidelines Section 15132.

¹ The California Department of Fish and Game has been renamed as the California Department of Fish and Wildlife, effective January 1, 2013.

2.1.2 - Comment Letters and Responses

The comment letters reproduced in the following pages follow the same organization as used in the List of Authors.

DEPARTMENT OF TRANSPORTATION

111 GRAND AVENUE
P. O. BOX 23660
OAKLAND, CA 94623-0660
PHONE (510) 286-6053
FAX (510) 286-6559
TTY 711



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December 21, 2012

SOLVAR012
SOL-37/80-VAR
SCH#2011092067

CALTRANS
Page 1 of 5

Ms. Michelle Heppner
Planning Department
County of Solano
675 Texas Street, Suite 6500
Fairfield, CA 94533

Dear Ms. Heppner:

Solano360 Specific Plan - Draft Environmental Impact Report (DEIR)

Thank you for continuing to include the California Department of Transportation (Caltrans) in the environmental review process for the project referenced above. As stated in our letter to Mr. Ron Grassi, dated October 20, 2011, Caltrans remains particularly concerned with the potential for traffic added by the project to result in congestion conditions on State Route (SR) 37 and Interstate (I)-80, resulting in potentially significant impacts onto the operation of these facilities. With this continuing concern in mind, Caltrans has reviewed the DEIR and we have the following comments to offer.

Vehicle Trip Generation

Vehicle trip generation is underestimated for Saturday peak-hour trips for Entertainment Mixed Use. Specifically, Tables 3.11-8, 3.11-9, and 3.11-10 Trip Generation Estimate Solano Fairground Draft Specific Plan Program Phase 1, Phases 1+2, and Phases 1+2+3, respectively, provide Saturday peak-hour trip generation rates by adopting land use (LU) #820 Shopping Center trip rates under the Institute of Transportation Engineer *Trip Generation, 8th Edition* (ITE Trip Generation) for Entertainment Mixed Use. Tables 3.11-8, 3.11-9, and 3.11-10 indicate the County of Solano (County) adopted $Ln(T) = 0.65 * Ln(X) + 3.76 \times 0.85$ for Saturday peak generated trips; however, the ITE Trip Generation instead adopts $Ln(T) = 0.65 * Ln(X) + 3.76$, an underestimation by the County of 15 percent. Therefore, the County's Entertainment Mixed Use significantly underestimates Saturday peak-hour generated trips of Entertainment Mixed Use, when compared to ITE Trip Generation.

Furthermore, Tables 3.11-8, 3.11-9, and 3.11-10 indicate that in addition to the 15 percent underestimation, the County would further apply an additional 35 percent trip reduction to Saturday peak-hour generated trips. For these reasons, Caltrans recommends the County adopt for this project the ITE Trip Generation's $Ln(T) = 0.65 * Ln(X) + 3.76$ and revise Saturday peak-hour generated trips of Entertainment Mixed Use in Tables 3.11-8, 3.11-9, and 3.11-10, revising the TIS and DEIR accordingly.

Ms. Michelle Heppner/County of Solano
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Highway Operations

Caltrans anticipates a significant traffic impact to State facilities, since the project site is located immediately adjacent to the intersection of SR 37 and I-80. Significant traffic impacts are expected to occur at: (1) the SR 37 eastbound connector to I-80 westbound; (2) the I-80 eastbound connector to SR 37 westbound; (3) the I-80 westbound connector to SR 37 westbound; and (4) the SR 37 eastbound connector to I-80 eastbound. Please analyze in detail and discuss completely the traffic generated impacts to these connectors.

4

Intersection #2 performance causes significant backups along the connectors from I-80 (both eastbound and westbound). Under existing conditions, the queue backs up well into the mainline of I-80 during peak hours. This problem will be exasperated by the Solano360 project. The proposed modifications to Intersection #2 do not increase the left-hand-turn movement capacity of the intersection. While 100 percent of project generated traffic using the SR 37 westbound off-ramp must make a left turn onto Fairgrounds Drive to access the project, no left turn improvement is proposed.

5

In Table 3.11-4, please include the EOS for I-80 eastbound off-ramp at Redwood Street. On page 3.11-84, we recommend replacing the word "Ramps" with "Interchange" for Fairgrounds Drive/SR 37 ramps and for Redwood Street/I-80 ramps. Also, there is a discrepancy between "Mitigation Measures for Impact TRANS-3" (see page 3.11-73) and Table ES-1 (see page ES-42). The stated mitigation measure for Impact TRANS-3 references the mitigation measures for Impact TRANS-1. However, Table ES-1 states, "No mitigation is necessary" for Impact TRANS-3. Please correct the discrepancy between ES-1 stating no mitigation is necessary with the stated mitigation measure on page 3.11-73 for Impact TRANS-1.

6

Lead Agency

As the lead agency, the County is responsible for all project mitigation, including any needed improvements to State highways. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

This information should also be presented in a Mitigation Monitoring and Reporting Plan as part of the environmental document. Required roadway improvements should be completed prior to issuance of the Certificate of Occupancy. Since an encroachment permit is required for work in the State ROW, and Caltrans will not issue a permit until our concerns are adequately addressed, we strongly recommend that the County ensure that our concerns are resolved during the environmental process, and in any case prior to submittal of an encroachment permit application. Further comments will be provided during the encroachment permit process.

7

The California Environmental Quality Act requires the adoption of reporting or monitoring programs when public agencies include environmental impact mitigation as a condition of project approval. Reporting or monitoring takes place after project approval to ensure implementation of the project in accordance with mitigation adopted during the CEQA review process.

8

Some of the information requirements detailed in the attached Guidelines for Submitting Transportation Information from a Reporting Program include the following:

Ms. Michelle Heppner/County of Solano
December 21, 2012
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- Name, address, and telephone number of the CEQA lead agency contact responsible for mitigation reporting;
- Type of mitigation, specific location, and implementation schedule for each transportation impact mitigation measure; and
- Certification section to be signed and dated by the lead agency certifying that the mitigation measures agreed upon and identified in the checklist have been implemented, and all other reporting requirements have been adhered to, in accordance with Public Resources Code Sections 21081.6 and 21081.7.

8
CONT

Further information is available on the following website:
http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa.html.

Cultural Resources

Caltrans requires that the project's environmental documents include documentation of a current archaeological record search from the Northwest Information Center of the California Historical Resources Information System if construction activities are proposed within State ROW. Current record searches must be no more than five years old. Caltrans requires the records search, and if warranted, a cultural resource study by a qualified professional archaeologist, and evidence of Native American consultation to ensure compliance with the California Environmental Quality Act (CEQA), Section 5024.5 and 5097 of the California Public Resources Code, and Volume 2 of Caltrans' Standard Environmental Reference (<http://ser.dot.ca.gov>).

9

These requirements, including applicable mitigation, must be fulfilled before an encroachment permit can be issued for project-related work in State ROW. These requirements also apply to National Environmental Policy Act documents, when there is a federal action on a project. Work subject to these requirements includes, but is not limited to: lane widening, channelization, auxiliary lanes, and/or modification of existing features such as slopes, drainage features, curbs, sidewalks and driveways within or adjacent to State ROW.

Traffic Impact Fees

Please identify all traffic impact fees to be used for project mitigation. Development plans should require traffic impact fees based on projected traffic and/or based on associated cost estimates for public transportation facilities necessitated by development. Please refer to the California Office of Planning and Research OPR 2003 *General Plan Guidelines*, page 163, which can be accessed on-line at the following website: <http://www.opr.ca.gov/index.php?a=planning/gpg.html>. Scheduling and costs associated with planned improvements on State ROW should be listed, in addition to identifying viable funding sources correlated to the pace of improvements for roadway improvements, if any.

10

We appreciate that the DEIR states that the project will contribute funding toward the I-80 Express Lanes project for the segment south of Redwood Parkway in Vallejo. The DEIR also states, "Because the funding and construction of the express lanes cannot be assured, this impact remains significant and unavoidable after mitigation." Although it may be difficult to fully and directly mitigate traffic impacts to State facilities, identifying impacts, mitigation measures or the equivalent cost of mitigation, please work with Caltrans and the Solano Transportation Authority

Ms. Michelle Heppner/County of Solano
December 21, 2012
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to estimate an appropriate traffic impact fee. It is important to account for traffic impact fees, as a way to accurately determine fair share funding of individual projects by either directly or indirectly addressing cumulative impacts.

10
CONT

Regional Impact Fees

Interstate 80 and SR 37 are critical to regional and interregional traffic in the San Francisco Bay region. It is vital to commuting, freight, and recreational traffic and is one of the most congested regional freeway facilities. Given the massive scale of the proposed project, the traffic generated will have significant regional impact to the already congested state highway system. Caltrans encourages the County to develop a regional transportation fee program to mitigate and plan for the impact of future growth on the regional transportation system. The fees would be used to help fund regional transportation programs that add capacity-increasing improvements to the transportation system to lessen future traffic congestion.

11

Reducing delays on State facilities will not only benefit the region, but also reduce any queuing on local roadways caused by highway congestion. The purpose of regional impact fee program would improve mobility by reducing time delays and maintaining reliability on major roadways throughout the San Francisco Bay Area.

Habitat Restoration and Management

Project level activities related to habitat restoration and management should be done in coordination with local and regional Habitat Conservation Plans, and with Caltrans where our programs share stewardship responsibilities for habitats, species and/or migration routes.

12

Freeway Monument Signage

Sign plans for any proposed freeway monument signage should be provided to Caltrans for review and, depending on proposed sign location, approval. The plans should depict the layout, roadway setback, orientation, glare intensity, and sign size. Caltrans is required by law to enforce the Outdoor Advertising Act and Regulations regarding the placement of advertising along the highways. That document is available on the internet at:
http://www.dot.ca.gov/hq/oda/download/ODA_Act_&_Regulations.pdf.

13

Encroachment Permit

Please be advised that any work or traffic control that encroaches onto the State ROW requires an encroachment permit that is issued by Caltrans. To apply, a completed encroachment permit application, environmental documentation, and five (5) sets of plans clearly indicating State ROW must be submitted to the address below. David Salladay, District Office Chief, Office of Permits, California Department of Transportation, District 4, P.O. Box 23660, Oakland, CA 94623-0660. Traffic-related mitigation measures should be incorporated into the construction plans prior to the encroachment permit process. See the website linked below for more information:
<http://www.dot.ca.gov/hq/traffops/developserv/permits>.

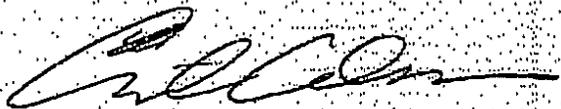
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Ms. Michelle Heppner/County of Solano
December 21, 2012
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CALTRANS
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Should you have any questions regarding this letter, please call Brian Brandert of my staff at (510) 286-5505.

Sincerely,



ERIK ALM, AICP
District Branch Chief
Local Development - Intergovernmental Review

c: Scott Morgan (State Clearinghouse)

State Agencies

California Department of Transportation (CALTRANS)

Response to CALTRANS-1

The agency provided introductory remarks to preface its comments. No response is necessary.

Response to CALTRANS-2

The agency stated that the vehicle trip generation for Saturday peak-hour trips for the proposed Entertainment Mixed Use is underestimated, due to application of a factor of 0.85. The factor of 0.85 was applied to the trip generation equation to factor down the trip generation from the “Saturday peak hour of generator” to the actual Saturday morning and afternoon peak hours in the project vicinity. Trip Generation, 8th Edition lists the Saturday peak hour of generator for Land Use #820 as 2:00–3:00 p.m., whereas the Saturday morning peak hour in the study area, based on the traffic counts collected, is 10:00–11:00 a.m. and the afternoon peak hour is 5:00–6:00 p.m.. Trip Generation, 8th Edition contains data describing the hourly variation in traffic for weekdays and Saturdays; the Saturday data were used to develop the 0.85 factor to describe the trip generation for the hours of 10:00–11:00 a.m. and 5:00–6:00 p.m. Therefore, the appropriate trip rate is used for the project’s traffic generation and impact analysis.

Response to CALTRANS-3

The agency indicated that the application of a 35-percent trip reduction to Saturday peak-hour-generated trips was not appropriate for the project analysis. The 35-percent trip reduction was taken on the Entertainment Mixed Use development to reflect linked trips that would be made to more than one use onsite, as described on Draft EIR page 3.11-36. As stated on page 3.11-36 of the Draft EIR, the reduction is taken as a percentage of the Entertainment Mixed Use trip generation, but the “credit” for the reduced trips is considered to be shared proportionally—based on gross trip generation—among the three uses onsite. Linked trips include trips made to an Entertainment Mixed Use site and the Fair site, to an Entertainment Mixed Use site and the Entertainment Commercial site, or to two Entertainment Mixed Use sites. This reduction is consistent with the allowable linked trip reductions for shopping center uses on a Saturday in the Trip Generation Handbook (2004) and is appropriate given the intended “destination” branding of the site.

Response to CALTRANS-4

The agency discussed anticipated impacts to State Route 37 (SR-37) and Interstate 80 (I-80). The agency requested a detailed analysis and discussion of project traffic-generated impacts to these connectors.

The freeway analysis is limited to the mainline segments in the project vicinity; Saturday data for the connector ramps was not available, and typically, freeway impact assessments do not cover connector ramps. (It is noted that the Fairgrounds Drive/Redwood Parkway Interchange Project Traffic Operations Analysis also did not assess the connector ramps directly.)

The mainline segment analysis, which is based on the limited Saturday volumes available from the Caltrans volume database at the time the analysis was prepared, indicates that the mainline segments downstream from the I-80/SR-37 connector ramps currently operate below capacity, and the forecasts indicate that the segments would continue to operate below capacity with the project. This indicates that back-ups onto the ramps do not typically occur and would not typically occur in the future with the project. However, it is acknowledged that on certain peak days with particularly high attendance at Six Flags Discovery Kingdom, the Fairgrounds, or both, more congestion occurs on the adjacent freeways, which may extend back onto the connector ramps for a period of time. The Fairgrounds Drive/Redwood Parkway Interchange Improvements Project, to which the project will contribute its fair share of funding, will add capacity to the Fairgrounds Drive/SR-37 interchange, which will reduce the instances of vehicle queues backing up onto the freeway mainline and connector ramps. The mitigation will lessen the frequency and severity of the impact; however, the mitigation would not reduce the project's impact to less than significant. The scenario of certain peak days with particularly high attendance at Six Flags Discovery Kingdom, the Fairgrounds, or both is not a scenario the Fairgrounds Drive/Redwood Parkway Interchange Improvements Project is designed to resolve.

Response to CALTRANS-5

The agency commented on potential impacts from intersection number 2 to the connectors from I-80. While the back-ups to the freeway system from the SR-37/Fairgrounds Drive ramp intersections noted in the comment do occasionally occur, the Draft EIR Saturday peak-hour analysis is not designed to capture the “peak of the peak” summer days when attendance at Six Flags Discovery Kingdom and the Fairgrounds are highest, but rather the regularly recurring peak for summer weekends from May to October. The standard practice for analysis under CEQA is to capture the regularly recurring peak traffic time for the study area, not the absolute or “peak of peak” scenario. This is why it is typical to study the weekday commute peak hours; however, for this project and study area, the regularly recurring peak times occur on summer weekends from May to October.

The analysis does identify a deficient LOS at intersection number 2 for the Cumulative Plus Project Phases 1 and 2 scenario and the Cumulative Plus Project Phases 1, 2 and 3 scenario. The proposed mitigation is consistent with the planned improvements in the Fairgrounds Drive/Redwood Parkway Interchange Improvements Project, which improve capacity at this intersection through provision of an additional southbound through lane and an additional westbound right-turn lane. While the comment is correct that neither of those improvements directly serves project traffic, the additional capacity it will provide allows the projected LOS to improve to acceptable service levels.

Response to CALTRANS-6

The agency recommended modifications to Table 3.11-4 and text on page 3.11-84. The agency also identified a discrepancy between the Executive Summary table and the mitigation measure on page 3.11-73.

Concerning the first recommendation, the LOS for the I-80 Eastbound Off-ramp at Redwood Street is included in Table 3.11-4 as intersection number 16, Redwood Street/Admiral Callaghan Lane (Admiral Callaghan Lane forms the north leg of the intersection). The intersection name will be changed to refer to Redwood Street/Admiral Callaghan Lane/I-80 Eastbound Off-ramp. Regarding the request to replace “Ramps” with “Interchange” on page 3.11-84, the location of the reference is not clear, and it is preferred to keep the specific “ramps” references to ensure that the appropriate intersection is referenced, since “interchange” typically refers to multiple intersections and ramps as a unit.

The change to the name of intersection number 16 and Executive Summary discrepancy have been corrected and is noted in Section 3, Errata.

Response to CALTRANS-7

The agency provided standard language about the lead agency’s responsibility for project mitigation and information on the process for obtaining encroachment permits for work within the state right-of-way. No response is necessary

Response to CALTRANS-8

The agency provided standard language about reporting and monitoring programs, and information requirements from the Guidelines for Submitting Transportation Information from a Reporting Program. No response is necessary

Response to CALTRANS-9

The agency provided standard language about documentation of a current archaeological record search. As described in the Draft EIR, a record search was conducted at the Northwest Information Center in Rohnert Park for the project area and a 0.25-mile radius beyond the project boundaries on April 22, 2011. Additional records searches will be conducted when the existing search nears the end of its effective lifespan of 5 years.

Response to CALTRANS-10

The agency requested that all traffic impact fee amounts be identified, and that the County work with Caltrans and the Solano Transportation Authority to estimate an appropriate traffic impact fee. Mitigation Measures TRANS-1 and TRANS-9 require the project to contribute its fair share of both the I-80 Express Land project and Fairgrounds Drive/Redwood Parkway Interchange Improvements, which will be paid in the form of traffic impact fees. As provided in the Draft EIR starting on page 3.11-83, Mitigation Measure TRANS-9 describes the methodology for traffic impact fee assessment for the project. As recommended by the agency, the traffic impact fees are based on projected traffic, specifically, the project’s proportional share of total 2035 traffic, as modeled in the analysis. It is currently not feasible to estimate an accurate dollar amount for the project’s traffic impact fees. At such time that specific development is proposed, the project proponent will work with Caltrans and

Responses to Written Comments

the Solano Transportation Authority to estimate the project's fair share to be paid as an appropriate traffic impact fee.

Response to CALTRANS-11

The agency recommended that the County develop a regional transportation fee program. The development of a regional transportation fee program is not a proposed component or alternative to the project. In addition, development of a regional transportation fee program is outside the scope of the Draft EIR. No further response is necessary.

Response to CALTRANS-12

The agency provided standard language about the habitat restoration and management coordination. No response is necessary.

Response to CALTRANS-13

The agency provided standard language about freeway monument signage review. No response is necessary.

Response to CALTRANS-14

The agency provided standard language about the encroachment permit process. No response is necessary.



State of California – The Natural Resources Agency
 DEPARTMENT OF FISH AND GAME
 Bay Delta Region
 7329 Silverado Trail
 Napa, CA 94558
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EDMUND G. BROWN JR., Governor
 CHARLTON H. BONHAM, Director



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Solano Cty. CAO

December 20, 2012

Ms. Michelle Heppner
 County of Solano
 Solano County Government Center
 675 Texas Street, Suite 6500
 Fairfield, CA 94533
Solano360@SolanoCounty.com

DFG
 Page 1 of 5

Dear Ms. Heppner:

Subject: Solano 360 Specific Plan, Draft Environmental Impact Report, SCH #2011092067, Solano County

The Department of Fish and Game (DFG) has reviewed the draft Environmental Impact Report (EIR) for the Solano 360 Specific Plan (Plan). DFG is identified as a Trustee Agency pursuant to the California Environmental Quality Act (CEQA) Section 15386, and is responsible for the conservation, protection, and management of the State's biological resources. DFG is submitting comments on the draft EIR as a means to inform the County of Solano (County) as the Lead Agency of our concerns regarding sensitive resources which could potentially be affected by the proposed Plan. DFG submitted comments on the Notice of Preparation (NOP) of the draft EIR for the proposed Plan in a letter dated October 18, 2011. DFG is providing additional comments on some of the mitigation measures that are included in the draft EIR.

1

Project Location and Description

The proposed 149.1-acre Plan area is located immediately southwest of the Interstate-80 (I-80) and State Route 37 interchange within the City of Vallejo. Six Flags Discovery Kingdom theme park and Lake Chabot are located west of the Plan area across from Fairgrounds Drive.

The proposed Plan involves the redevelopment and expansion of the existing Solano County Fairgrounds which is owned by the County. The proposed Plan area is used for public events by the Solano County Fair Association and as overflow parking for the adjacent theme park. Existing facilities located within the Plan area include administration and exposition buildings and parking areas. The components of the proposed Plan include both public development, such as the Fairgrounds (35 acres), Creek Park (6 acres), Fairgrounds Channel (18 acres), parking (27 acres), roads and pedestrian/bike paths (14 acres), and private development such as Entertainment-Mixed Use (19 acres) and Entertainment-Commercial (30 acres).

2

Habitat Assessment

The draft EIR states that the proposed Plan area has a relatively low biotic resource value due to past and current commercial use and development within the Plan area and surrounding areas. The four streams that are located within the Plan area (North, Center, and South Rindler creeks and Blue Rock Springs) have been diverted into a combination of underground pipes

3

and open channels. The draft EIR states that stream reaches located within the Plan area support hydrophytic vegetation such as watercress (*Nasturtium* spp.), bulrush (*Scirpus* spp.) and cattail (*Typha* spp.), and the streambanks support riparian species such as willows (*Salix* spp.). Other habitat types present within the Plan area include approximately 0.51 acres of wetlands and several small areas of non-native grassland. Ornamental trees located within the Plan area could serve as potential nesting habitat for raptors and other bird species. The draft EIR states that no special-status plant species are expected to occur within the proposed Plan area due to the lack of suitable habitat. Reconnaissance surveys conducted within the Plan area in 2011 did not document presence of any special-status wildlife species.

3
CONT

Under Impact BIO-1 (Page 3.3-10) of the draft EIR, it states that the proposed Plan area supports suitable, albeit low-quality, aquatic and upland habitat for the California red-legged frog (*Rana draytonii*). The Plan area also supports suitable aquatic and basking habitat for the Pacific pond turtle (*Actinemys marmorata*). California red-legged frog is federally listed as threatened under the Endangered Species Act (ESA), and both the frog and turtle are designated as state Species of Special Concern. As indicated in DFG's comment letter on the NOP, known occurrences of California red-legged frog are present within reaches of Rindler Creek located east of I-80 and within 0.5 miles of the proposed Plan area. Blue Rock Springs, located southeast of the Plan area, also supports known frog breeding habitat. Although I-80 is a significant barrier to frog movements, individuals could potentially use Rindler Creek as a dispersal route to access the Plan area or be transported during high waterflow events.

Mitigation Measure BIO-1a

Mitigation Measure (MM) BIO-1a in the draft EIR states that protocol-level surveys for California red-legged frog and Pacific pond turtle will be conducted in suitable habitat within the proposed Plan area. For clarity, DFG recommends that the EIR specify that frog surveys will follow the *Revised Guidance on Site Assessments and Field Surveys for the California Red-legged Frog (August 2005)* issued by the U.S. Fish and Wildlife Service (USFWS). The proposed Plan is expected to be implemented in phases and each phase involving a water feature may take five or more years to complete. Therefore, please be advised that California red-legged frog surveys are typically considered valid by USFWS and DFG for a period of two years only. DFG should be notified in the event that California red-legged frogs are documented within the Plan area during surveys.

4

MM BIO-1a states that prior to disturbing any California red-legged frog habitat, the County will consult with USFWS and obtain take authorization through ESA. DFG recommends that the County also consult with DFG as early as possible prior to submitting the notification for a Lake and Streambed Alteration Agreement (LSAA; see below) for projects associated with the proposed Plan. Issuance of agreements under the Lake and Streambed Alteration Program requires that the CEQA document fully describe all potential impacts of the project on biological resources. However, the draft EIR for the proposed Plan does not fully describe and analyze the potential temporary and/or permanent impacts of the proposed Plan on California red-legged frog and Pacific pond turtle and their habitats in the event that these species are documented on-site. The EIR should address the potential long-term impacts on aquatic species resulting from the creation of permanent water features within the Plan area such as the Creek Park and Fairgrounds Channel. If these permanent water features will provide suitable breeding habitat for the frog, turtle and other aquatic species, then the County should prepare a

5

detailed management and monitoring plan to maintain populations of special-status species with measures to prevent aquatic predators such as fish and bullfrogs from colonizing California red-legged frog habitat.

DFG recommends that the EIR identify appropriate, effective and potentially feasible compensatory mitigation for impacts on suitable aquatic, dispersal and upland habitat for California red-legged frog and Pacific pond turtle. Although the County is not a plan participant of the Solano County Water Agency's draft Habitat Conservation Plan (HCP), DFG recommends incorporating the draft HCP's avoidance, minimization and mitigation measures for special-status species that could occur within the Plan area. Although the Plan area is located outside of the California red-legged frog conservation area, the draft HCP outlines applicable replacement ratios for loss of habitat in these areas (refer to Section 6 of the draft HCP).

5
CONT

Mitigation Measure BIO-1b

MM BIO-1b in the draft EIR states that a qualified biologist will conduct a pre-construction survey for nesting migratory birds and tree-nesting raptors in all trees occurring within 500 feet of Plan-related construction areas. The draft EIR includes avoidance and minimization measures such as conducting construction, tree trimming and removal during the non-nesting season (September 1 to January 31) and establishing protective nest buffers surrounding active nests for work conducted during the nesting season. Please be advised that relatively large raptors such as the red-tailed hawk (*Buteo jamaicensis*) may require up to 1,000 feet of protective buffer surrounding an active nest in order to prevent disturbance during construction. DFG recommends that the County or a DFG-approved qualified biologist notify DFG if any nesting activity is documented within or near the Plan area so that, through consultation, effective avoidance measures can be developed.

6

During the initial surveys, suitable habitat for the burrowing owl (*Athene cunicularia*), including artificially managed areas such as the golf course, was not observed within the propose Plan area. Although no suitable burrows or signs of burrowing owl occupancy were observed, fossorial mammals may occupy the area in the future and subsequently provide burrows used as nesting and/or wintering habitat by owls. Burrowing owls are known to occupy both natural burrows in annual grassland, roadside berms and golf courses, as well as artificial structures such as pipes and culverts. Given that the Plan area is proposed to be developed over a long-term timeframe, DFG recommends that the EIR specify that pre-construction burrowing owl surveys will be conducted no less than 14 days prior to the start of construction activities with a final survey conducted within 24 hours prior to ground disturbance. Surveys should be conducted in suitable burrowing owl habitat (for example, short or sparse vegetation, natural burrows or burrow surrogates) within a minimum of 500 feet of the proposed work area. Since burrowing owls may overwinter at a site, surveys should be conducted prior to any construction planned during either the nesting (typically February 1 until August 30) or non-breeding season. The methodology for conducting owl surveys is described in *Appendix D: Breeding and Non-breeding Season Surveys* of the DFG Staff Report on Burrowing Owl Mitigation, which is available at <http://dfg.ca.gov/wildlife/nongame/docs/BUOWStaffReport.pdf>. DFG should be notified in the event that owls occupy the Plan area or adjacent lands in order to develop take avoidance, minimization and mitigation measures.

7

The proposed design guidelines mentioned in Section 2 (Project Description) of the draft EIR include landscaping. In order to add habitat value to the designated landscaping areas, DFG recommends that the County use native plant species only for landscaping. Native species should be appropriate to the local soil and climate conditions. To help control the spread of invasive species, planting or seeding of non-native, DFG also recommends that invasive plant species that are identified in the California Invasive Plant Council's inventory database (<http://www.cal-ipc.org/ip/inventory/weedlist.php>) be avoided.

8

Lake and Streambed Alteration Agreement

The draft EIR states that proposed Plan-related activities include widening and deepening the existing fairgrounds channel, installing culverts or bridges, and possibly filling-in portions of channels. The draft EIR states that the realignment and redesign of the channel and installation of stormwater detention basins within the Plan area should reduce flooding conditions for nearby properties and improve water quality of runoff that eventually discharges into Lake Chabot.

DFG will require an LSAA, pursuant to Fish and Game Code Section 1600 *et seq.*, with the County for the proposed Plan-related activities within 1600-jurisdictional features, including riparian habitat located within the Project area. Notification is required for any activity that will substantially divert or obstruct the natural flow of, or substantially change or use any material from the bed, channel, or bank of, any river or stream, or adversely affect fish and wildlife resources. Issuance of an LSAA is subject to CEQA. DFG, as a Responsible Agency under CEQA, will consider the EIR for the proposed Plan. DFG may not execute the final LSAA until it has complied with CEQA (Public Resources Code section 21000 *et seq.*) as the Responsible Agency. To obtain information about the LSAA Notification process, please access our website at <http://www.dfg.ca.gov/habcon/1600/>; or to request a notification package, contact the Lake and Streambed Alteration Program at (707) 944-5520.

9

The draft EIR states that approximately six acres of riparian habitat will be temporarily affected, and implementation of the Plan will result in riparian habitat with a greater structural diversity and higher biotic value. DFG considers any removal of riparian trees and shrubs and wetland vegetation as a permanent impact. The EIR should describe and quantify all temporary and/or permanent impacts to the physical characteristics of channel reaches (bed and bank), their hydrologic functions as well as associated riparian and wetland habitat. Under Impact BIO-2 (Page 3.3-17), riparian habitat affected by construction is proposed to be replaced, restored and/or enhanced at a 1:1 mitigation ratio. Please be advised that DFG does not consider a 1:1 replacement ratio sufficient compensation for the temporal loss of habitat. A detailed mitigation and monitoring plan (MMP) for impacts to stream channels and riparian habitats should be submitted to DFG as part of the LSAA notification process. The MMP should include the specific locations of the revegetation sites, timing of revegetation, plant palette, performance criteria to be met to ensure successful revegetation, and adaptive management and monitoring actions. The riparian channel edge and buffer areas shown in Exhibit 2-10 (Page 2-35 of the draft EIR) should be clearly described in the MMP in order for DFG to evaluate the effectiveness of the revegetation efforts.

10

Mitigation Measure BIO-2

MM BIO-2 specifies measures to minimize impacts to streams and riparian habitat resulting from Plan-related construction such as erosion control and bank stabilization methods. Please be advised that DFG does not recommend using fiber rolls wrapped in plastic netting as specified in MM BIO-2(4)(D). Erosion control materials containing plastic monofilament netting or similar material containing netting are known to entangle or trap amphibians and reptiles. Acceptable substitutes include coconut coir matting or tackified hydroseeding compounds.

11

Water Rights

As indicated in our NOP comment letter, water diversion and water storage (for a period of 30 days or more) may also require a water rights permit from the State Water Resources Control Board, Division of Water Rights. DFG recommends that the County consult with the appropriate permitting agencies on the proposed Plan design in order to develop appropriate and effective mitigation and avoidance measures.

12

DFG appreciates the opportunity to comment on the Solano 360 Specific Plan. DFG staff is available to meet with you to further clarify our comments and provide technical assistance on any changes necessary to protect resources. If you have any questions, please contact Ms. Brenda Blinn, Environmental Scientist, at (707) 944-5541 or bblinn@dfg.ca.gov; or Ms. Karen Weiss, Senior Environmental Scientist, at (707) 944-5525.

13

Sincerely,



Scott Wilson
Acting Regional Manager
Bay Delta Region

cc: State Clearinghouse

Mr. Ryan Olah, U.S. Fish and Wildlife Service
ryan_olah@fws.gov

California Department of Fish and Game (DFG)

Response to DFG-1

The agency provided introductory remarks to preface its comments. No response is necessary.

Response to DFG-2

The agency provided a description of the proposed project. No response is necessary.

Response to DFG-3

The agency provided a description of the habitat assessment as provided in the Draft EIR and reiterated the agency's Notice of Preparation comment concerning known occurrences of California red-legged frog. Comment noted. No response to this comment is required.

Response to DFG-4

The agency discussed Mitigation Measure BIO-1a, as provided in the Draft EIR. Mitigation Measure BIO-1a in the Draft EIR states that protocol-level surveys for California red-legged frog and Pacific pond turtle will be conducted in suitable habitat within the proposed Plan Area. Red-legged frog protocol surveys will follow the Revised Guidance on Site Assessments and Field Surveys for the California Red-Legged Frog (August 2005) issued by the United State Fish and Wildlife Service (USFWS). Since the proposed plan will be implemented in phases, red-legged frog surveys will be conducted in suitable habitat within 2 years prior to any construction activities to determine presence/absence. In the event that construction activities are scheduled within a portion of the project site that has not had protocol surveys within 2 years, additional protocol surveys will be required. No edits or modifications to the Draft EIR analysis, findings, or mitigation are required.

Response to DFG-5

The agency further discussed Mitigation Measure BIO-1a and the agency consultation requirement. The agency recommended the County conduct consultation as early as possible prior to submitting the notification for a Lake and Streambed Alteration Agreement for projects associated with the proposed Plan. The agency further discussed Lake and Streambed Alteration Agreements and CEQA documentation.

The Planning Area will be developed over an extended period of time; thus, conducting protocol surveys prior to approval of the CEQA document is not feasible, since much of the development will be conducted more than 2 years after the CEQA document is approved. Mitigation Measure BIO-1a requires species-specific surveys, following established protocol, to be conducted to identify whether California red-legged frogs (CRLF) or Pacific pond turtles (PPT) are present within the reaches of the creeks associated with the site the year prior to work occurring within the bed or banks of the creeks. In the event that red-legged frogs are present within the project site, an incidental take permit under Section 7 of the Endangered Species Act will be required. As part of the Section 7 consultation, a Mitigation and Management Plan will be prepared, which will describe and analyze the potential temporary and/or permanent impacts of the proposed Plan on California red-legged frog. The Mitigation and Management Plan must also include a discussion of appropriate compensatory

mitigation measures. Because of the low-quality habitat within the Planning Area, compensation for the loss of habitat will be mitigated at a 1:1 ratio for temporary impacts and a 2:1 for permanent impacts. In addition, the Planning Area will incorporate the Solano County Water Agency's draft HCP's avoidance, minimization, and mitigation measures for special-status species that could occur within the Plan Area. Therefore, no edits or modifications to the Draft EIR analysis, findings, or mitigation are required.

Response to DFG-6

The agency discussed Mitigation Measure BIO-1b and requirements for a preconstruction survey for nesting migratory birds and tree-nesting raptors. DFG recommends that a County or a DFG-approved qualified biologist notify DFG if any activity is documented within or near the Plan Area so that, through consultation, effective avoidance measures can be developed. The biological monitor will conduct a pre-construction survey as stated in the Draft EIR. The DFG advises that large raptors may warrant up to 1,000-foot buffers. If large raptors are observed within the vicinity of the project site and outside of the 500-foot buffer area, the biological monitor will evaluate the need to expand construction avoidance buffers surrounding the nest. In the event that an active nest may potentially be impacted by project construction activities, the DFG will be consulted to determine the appropriate buffer area. Construction activities may proceed within the buffer area at the discretion of the biological monitor. Therefore, no edits or modifications to the Draft EIR analysis, findings, or mitigation are required.

Response to DFG-7

The agency discussed burrowing owl habitat and mitigation and recommends a modification of Mitigation Measure BIO-1b. Surveys will be conducted in suitable burrowing owl habitat, including a 500-foot buffer of the proposed work area. Because the Planning Area will be developed over an extended length of time and because of the low-quality burrowing owl habitat onsite, pre-construction burrowing owl surveys will be conducted within 14 days prior to the start of any new construction phase, regardless of the time of year. Since burrowing owls may overwinter at a site, surveys should be conducted prior to any construction planned during either the nesting season (typically February 1 until August 30) or the non-breeding season. DFG will be notified in the event that owls occupy the Plan Area or adjacent lands. In the event that burrowing owl are observed onsite, an assessment of project related impacts and long-term conservation requirements will be conducted to determine the appropriate mitigation measures based on the current site conditions. Mitigation measures may vary from passive relocation to offsite habitat compensation, depending on a number of environmental and biological factors. The requested addition to Mitigation Measure Bio-1b has been made and is noted in Section 3, Errata.

Response to DFG-8

The agency recommended that the County use only native plant species for landscaping. The County will use native plant species for landscaping to the extent feasible. Native species should be appropriate to the local soil and climate conditions. The County will avoid using invasive plant

species that are identified in the California Invasive Plant Council's inventory database (<http://cal-ipc.org/ip/inventory/weeklist.php>).

Response to DFG-9

The agency provided additional information to the County about requirements for a Lake and Streambed Alteration Agreement (LSAA), pursuant to Fish and Game Code Sections 1600, et seq., for the proposed Plan-related activities within 1600-jurisdictional features, including riparian habitat located within the project area. Commented noted. The County will follow the appropriate process in obtaining an LSAA with the agency.

Response to DFG-10

The agency recommended that the Draft EIR describe and quantify all temporary and/or permanent impacts to the physical characteristics of channel reaches (bed and bank), their hydrologic functions, and associated riparian and wetland habitat, and advises consideration of the replacement ratio for temporal loss of habitat. In the Draft EIR, a 1:1 replacement ratio was recommended as compensatory mitigation for impacts to streambeds under DFG Code 1600. Sufficient compensation for the temporal loss of habitat will be negotiated during the LSAA process. Typically, mitigation ratios required for impacts to streambeds include a 1:1 ratio for temporary impacts and a 2:1 for permanent impacts. Also considered in the negotiated mitigation ratio is the habitat function and value. A detailed mitigation and monitoring plan (MMP) for impacts to stream channels and riparian habitats will be submitted to DFG as part of the LSAA notification process. The MMP will include the specific locations of the revegetation sites, timing of revegetation, plant palette, performance criteria to be met to ensure successful revegetation, and adaptive management and monitoring actions. The riparian channel edge and buffer areas shown in Exhibit 2-10 (page 2-35 of the Draft EIR) will be clearly described in the MMP in order for DFG to evaluate the effectiveness of the revegetation efforts.

Response to DFG-11

The agency discussed Mitigation Measure BIO-2, which minimizes impacts to streams and riparian habitat resulting from Plan-related construction such as erosion control and bank stabilization methods. The agency does not recommend using fiber rolls wrapped in plastic netting as specified in MM BIO-2(4)(D). Erosion control materials containing plastic monofilament netting or similar material containing netting will not be used for erosion control measures. An acceptable substitute such as coconut coir matting or tackified hydroseeding compounds will be used. The requested change has been made and is noted in Section 3, Errata.

Response to DFG-12

The agency states that water diversion and storage may require water rights permits from the State Water Resources Control Board, Division of Water Rights. The agency recommends that the County consult with appropriate permitting agencies in order to develop appropriate and effective mitigation

Responses to Written Comments

and avoidance measures. Comment noted. The County will follow the appropriate process to consult with the State Water Resources Control Board for applicable permitting requirements.

Response to DFG-13

The agency provided concluding remarks to close its letter. No response is necessary.



January 8, 2013

Solano County Government Center
675 Texas Street, Suite 6500
Fairfield, CA 94533

Received
JAN 08 2013

Solano Cty. CAO

VALLEJO SANITATION &
FLOOD CONTROL DISTRICT

Attn: Michelle Heppner, Legislative, Intergovernmental and Public
Affairs Officer

COMMENTS ON SOLANO 360 EIR

*Protecting public health
and the San Francisco Bay
since 1952.*

The Vallejo Sanitation and Flood Control District (VSFCD) appreciates the opportunity to comment on the Draft EIR for the Solano 360 Project. VSFCD's comments will concentrate on flooding and water quality issues.

1

450 Ryder Street
Vallejo, California 94590
phone 707-644-8949
www.VSFCD.com

To properly understand flooding and drainage issues of the Solano Fairgrounds site, it is helpful to look at the historical context.

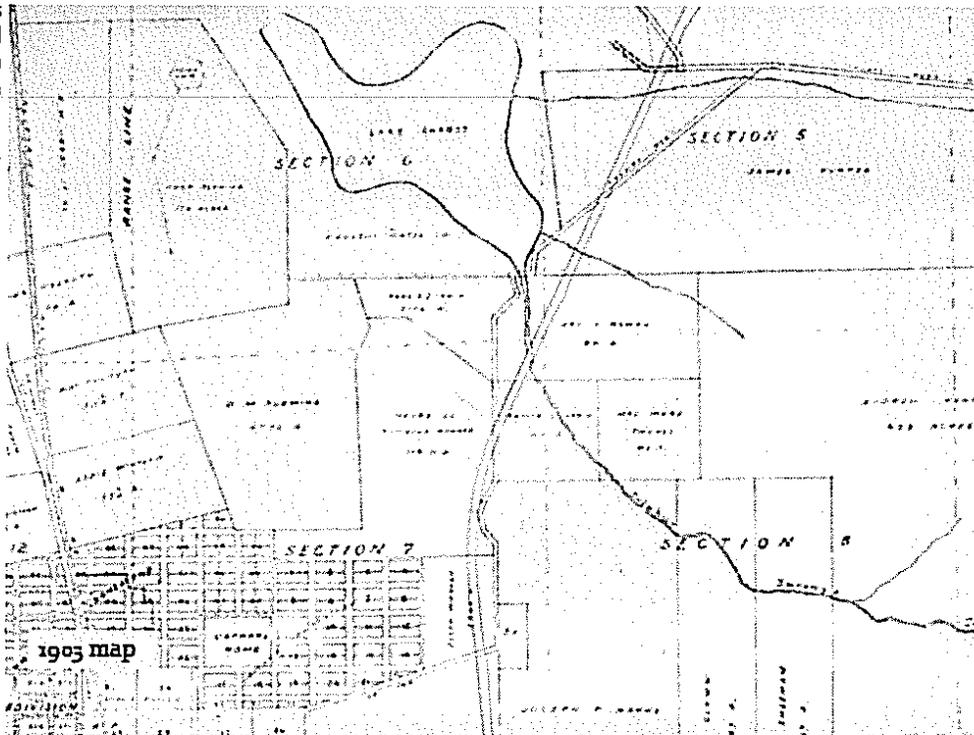
An early cadastral map (1903) shows property lines and drainage features. Lake Chabot, the main branch of Rindler Creek, the southern branch of Rindler Creek, and Blue Rock Springs Creek (at that time named Sulphur Springs Creek) are clearly visible. Note that the main branch of Rindler Creek is entering Lake Chabot in a fairly straight alignment through the center of the Solano 360 site.

BOARD OF TRUSTEES

- Osby Davis
- Erin Hannigan
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- Robert H. McConnell
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DISTRICT MANAGER

Ronald J. Matheson



2

One of the first aerial photos (1937) of the area confirms the alignment of the main branch of Rindler Creek. Lake Chabot is barely visible on the left margin of the photo. The future Interstate 80 and its intersection with the future State Route 37 is clearly shown. A line of trees along the future Columbus Parkway shows the approximate location of the main branch of Rindler Creek. The culvert under the future Interstate 80 appears to be in the same location as it is today. A darker colored area crossing the Solano 360 site indicates vegetation and relatively wetter conditions leading down to Lake Chabot.

Also clearly visible on this photo is the north branch of Rindler Creek, which appears to be channelized between the future State Route 37 crossing and Lake Chabot.



In an oblique aerial from 1945, the sweeping connector between SR37 and I-80 is clearly visible. With magnification, all four tributaries to Lake Chabot are visible. The area bounded by Lake Chabot, SR37, and I-80 roughly corresponds to the Solano 360 project area and shows hardly any development.



2
CONT

The aerial on the following page is dated 1965 and shows several changes. The Solano County Fairgrounds have been constructed and the site drainage has been modified dramatically. The main branch of Rindler Creek has been diverted along the western edge of I-80, where a new channel collects the southern branch of Rindler Creek and Blue Rock Springs Creek before following the eastern edge of Fairgrounds Drive and then crossing Fairgrounds Drive to join Lake Chabot.

Also visible are the Newell Mobile Home Park and Coach Lane. Blue Rock Springs Creek traverses the mobile home park and joins Rindler Creek at Coach Lane. As demonstrated recently on December 2, 2012, the junction of the two creeks and the mobile home park is subject to frequent flooding. Most of the time, flooding is due to Rindler Creek overflowing its banks and inundating the northern portion of the mobile home park.



VSFCD was created in 1952 and has the responsibility to maintain the capacity of the flood control channels around the Fairgrounds by controlling vegetation growth and sediment deposition. VSFCD was also authorized to plan improvement projects for adequate conveyance capacity and collect developers' fees to finance such projects.

3

Flooding in the Fairgrounds area occurred at the race track and at the horse stables at the southern end. A berm was built to protect the race track. The flooding of the horse stables remains unaddressed.

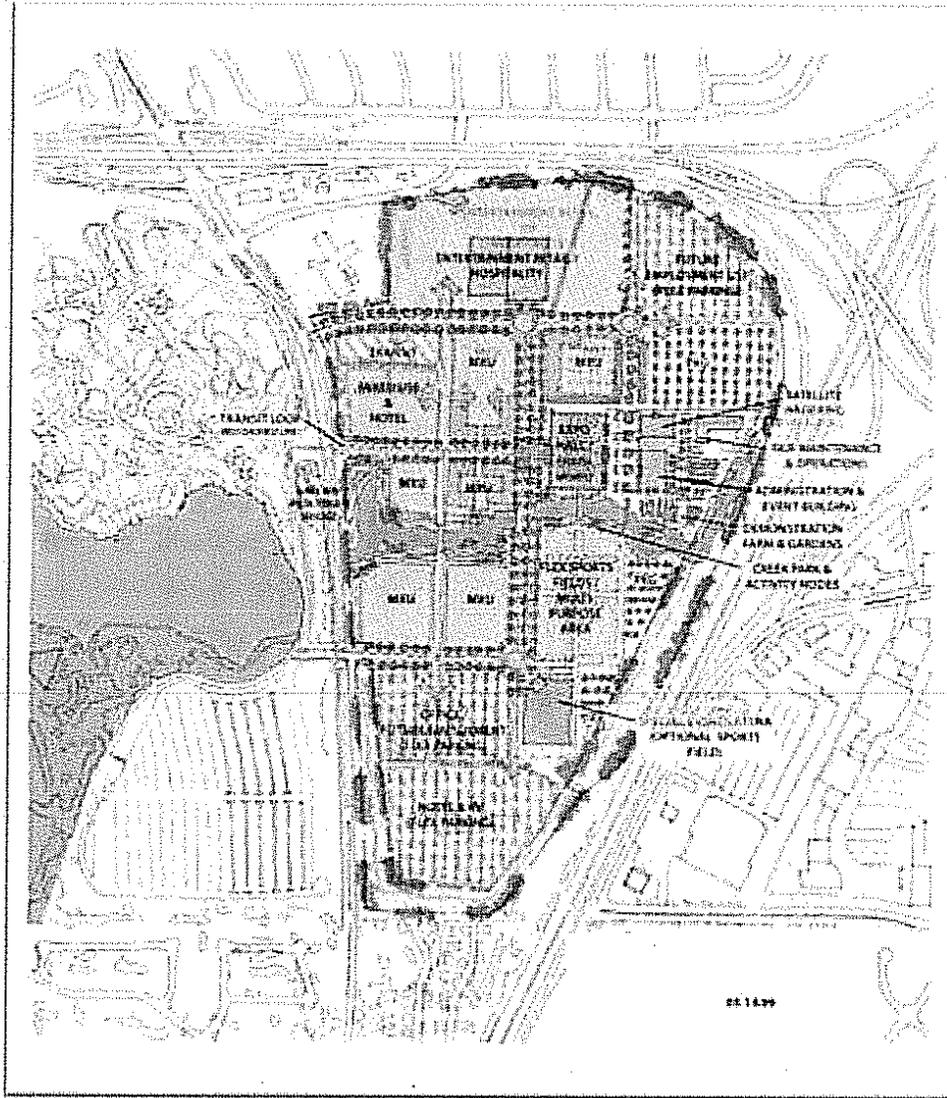
4

In the early 1990s, a controversy arose about development of the Northgate area, which increased flows in Rindler Creek by adding impervious area to the watershed. On September 15, 1993, VSFCD entered into discussions for a plan to improve the channel around the Fairgrounds after storm drain connection fees from 1000 new residences in Northgate had been collected. Upon reaching this threshold, VSFCD commissioned a study and found that increasing the size of the channel to accommodate the 100-year discharge could only be accomplished by significantly encroaching into the area occupied by the horse stables. All parties to the agreement decided that, rather than improving the channel, VSFCD should help identify and fund a better solution in concert with future master plans for the Fairgrounds. The study was abandoned after a presentation of the preliminary results to the City of Vallejo, the Fairgrounds, and VSFCD

5

The flood control issues were investigated again in 2004 when the Mills Corporation was selected as a Master Developer. VSFCD worked with National Survey & Engineering out of Wisconsin on a channel design and successfully promoted relocating the main branch of Rindler Creek back into the center of the Fairgrounds (personal communication). This concept was documented by BDC & Associates in their "Fair of the Future" plan (no hardcopy available at VSFCD offices). In 2006 the "Fair of the Future" became a Fair of the past when the Mills Corporation abandoned the project.

VSFCD resumed promoting a channel through the center of the Fairgrounds again when the current "Solano 360" effort started in 2009. The following is an early "vision" plan which shows the main branch of Rindler Creek crossing the development as a water feature, flood control channel, and open space.



6

Re-directing the flow from the main branch of Rindler Creek through the center of the Fairgrounds would have several benefits. First, it would be preferred by the resource agencies, who favor the restoration of creeks in their old alignment and may allow it to serve as mitigation for other impacts. Second, it would eliminate the wide channel bordering I-80, which would make more area available for commercial use. Third, it would remove a significant hydraulic load from the channel around the southern border of the Fairgrounds which, as mentioned above, causes flooding problems at the Newell Mobile Home Park.

7

The Draft EIR currently in circulation shows that the flood control channel is now proposed to be disconnected from Rindler Creek and be a multi-purpose lake, simultaneously serving as a recreation facility, a stormwater BMP (Best Management Practice), and a source of irrigation water.

8

8
CONT

These are all valuable beneficial uses, but they may be very difficult to achieve because of competing regulations for recreation (boating), irrigation water quality, and stormwater. Specifically, the lake is proposed to be filled by stormwater and replenished from Lake Chabot. Neither stormwater from commercial areas and parking lots nor the water from Lake Chabot, which has high e-coli concentrations, may be useable for irrigation or recreation.

9

The Solano 360 Project, as presented in the draft EIR, relies on the channel around the southern boundary of the project to collect all drainage from the east and convey it to Lake Chabot. The portion of the channel paralleling Fairgrounds Drive is impacted by a proposed Caltrans project for the widening of Fairgrounds Drive. The EIR (Redwood Road – Fairgrounds Drive EIR) for this project is being circulated concurrently with the Solano 360 EIR. However, the Solano 360 EIR does not refer to the Caltrans EIR and it is not known whether the proposed channel widening along Fairgrounds Drive is compatible with the Caltrans project. As the Caltrans EIR proposes the relocation of the channel, coordination between the two projects is important.

10

The Solano 360 plan proposes to widen the channel around the southern portion of the Fairgrounds to a 100-year capacity. VSFCD has not had an opportunity to review the hydraulic calculation that the channel design was based on. VSFCD understands that the design includes improvements to the culvert under Fairgrounds Drive. VSFCD's previous investigation of a widening of the channel, which did not contemplate changes to the existing culvert, did not yield a solution that was compatible with the current use of the area or the use anticipated by the Solano 360 Project.

11

Another effort paralleling the development of the Solano 360 Project is the revision of the FEMA flood insurance maps by Baker Engineers. The draft map has been reviewed by City and VSFCD staff and the final map should be available soon. The draft map is based on LIDAR topographic data and provides significantly greater detail than the current FEMA map. Flood control investigations of the Solano 360 Project should take advantage of this new analysis.

12

In conclusion, VSFCD favors the drainage pattern documented in the early vision (2009) of the Solano 360 planning effort. This concept would have the following benefits:

- Relocating Rindler Creek to its original path through the middle of the development would have significant flood control benefits and would rally the resource agencies behind the project.
- Diverting flows away from the channel along Coach Lane and directly into Lake Chabot would provide flood protection to Newell Mobile Home Park and the southern portion of the Fairgrounds.
- The relocated Rindler Creek would provide recreational value such as walking path and picnic areas with water present at all times through a connection to Lake Chabot.

VSFCD appreciates your consideration of these comments.

VALLEJO SANITATION AND FLOOD CONTROL DISTRICT



RUDOLF OHLEMUTZ
Director of Engineering and Field Operations

Local Agencies

Vallejo Sanitation and Flood Control District (VSFCD)

Response to VSFCD-1

The agency provided introductory remarks to preface its comments. No response is necessary.

Response to VSFCD-2

The agency described the historical context of drainage, flooding, and actions taken to alleviate area flooding. No response is necessary.

Response to VSFCD-3

The agency described its regulatory responsibilities. No response is necessary.

Response to VSFCD-4

The agency described the existing flooding setting for a portion of the project site. Existing flooding conditions are noted in the Section 3.8 (Hydrology and Water Quality) of the Draft EIR and Section 2 (Site and Context) of the Specific Plan. No response is necessary.

Response to VSFCD-5

The agency described previous flood control studies that evaluated improvements to the channel around the project site. No response is necessary.

Response to VSFCD-6

The agency recommended re-directing the flow from the main branch of Rindler Creek through the center of the Fairgrounds. Redirecting flows from Central Rindler Creek by cutting an open channel through the middle of the Plan Area is not consistent with the Project Vision. The early Vision Plan referenced by the agency included a central lake that would function as a water feature, open space, and detention basin, but the central lake was never identified in the early Vision Plan as a flood control channel. Redesigning the water feature to serve as a flood control channel would require significant development setback from the water's edge, thereby eliminating the water feature as an iconic destination amenity as well as affecting other land uses in the plan. The agency does not discuss the project as proposed or the environmental analysis contained within the Draft EIR. Therefore, no additional response is necessary.

Response to VSFCD-7

The agency provided discussion of potential benefits from re-directing the flow from the main branch of Rindler Creek through the center of the Fairgrounds. As discussed in Response to VSFCD-6, re-directing Rindler Creek is not proposed, nor a component of a project alternative. The agency provided a preference for re-directing Rindler Creek but does not comment on the content or adequacy of the Draft EIR. Redirecting flows from Central Rindler Creek would not eliminate the need to substantially widen the existing channel at the southern end of the Plan Area. The runoff rates from South Rindler Creek and Blue Rock Springs alone require substantial channel improvements that will create environmental impacts. Redirecting Central Rindler Creek through the

Plan Area does not eliminate environmental impacts associated with flood control improvements. In addition, the agency does not recommend modifications or improvements to the proposed design or identified mitigation. Therefore, no additional response is necessary.

Response to VSFCD-8

The agency identifies the proposed project's water feature and expressed a concern that the water feature may not be usable for irrigation or recreation if stormwater or Lake Chabot water is used to replenish the feature. Use of water from Lake Chabot and stormwater are identified as options in the Draft EIR. However, the City of Vallejo's non-potable water supply or potable water could also be used. The intent is to reduce the project's potable water demand. Future recycled water, if available, may be used as well.

The agency states that neither stormwater from commercial areas and parking lots nor the water from Lake Chabot may be useable for irrigation or recreation; however, water from Lake Chabot is currently used to irrigate the existing golf course. In addition, the water feature would not experience active, high-contact recreation such as swimming or water skiing. The water feature is intended to be used for low-contact recreation, such as picnicking on the shore or non-motorized watercraft, e.g. paddleboating. Therefore, it is anticipated that there would be little to no human contact with the water in the feature.

Response to VSFCD-9

The agency noted that the portion of the project's periphery channel may be impacted by the proposed Fairgrounds Drive/Redwood Parkway Interchange Improvement Project (Interchange Project) and recommends coordination between the two projects. Comment noted. The County of Solano and the City of Vallejo have actively engaged the Solano Transportation Authority, as the lead for the Interchange Project, to coordinate plans, and will continue coordination to ensure the two projects are compatible relative to the location and design of the channel.

Response to VSFCD-10

The agency noted that they have not had the opportunity to review the hydraulic calculations for the proposed channel design. Comment noted. A wide channel with culvert modification is compatible with the proposed project. The hydraulic calculations will be provided to the agency with the tentative map for its review and comment.

Response to VSFCD-11

The agency recommend that flood control investigations take advantage of new Federal Emergency Management Agency (FEMA) maps. The Draft FEMA map discussed by the agency was reviewed during preparation of the analysis and Draft EIR.

Response to VSFCD-12

The agency provided concluding remarks to close its letter. No response is necessary.

Chryss Meier - FW: Solano 360 Project comment

From: "Heppner, Michelle" <MHeppner@SolanoCounty.com>
To: "Corsello, Birgitta E." <BECorsello@SolanoCounty.com>, "Curry, Bernadett...
Date: 1/9/2013 3:55 PM
Subject: FW: Solano 360 Project comment

More comments...

Michelle Heppner

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From: Julia Charles [mailto:jules@smallcraft.net]
Sent: Wednesday, January 09, 2013 3:08 PM
To: Heppner, Michelle
Subject: Solano 360 Project comment

Dear Ms. Heppner,

I am a resident of Vallejo, and I thank you for the opportunity to comment of the draft EIR for the Solano 360 project.

These findings particularly concerned me:

- The project could have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.
- The project could interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of wildlife nursery sites.
- The project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.
- The project would result in substantial soil erosion or the loss of topsoil.

Construction activities associated with the proposed project have the potential to degrade water quality in downstream water bodies.

I am concerned that the Draft EIR does not address the fact that the project will pave over at least 30 acres that are currently grassy field or dirt. The report does not QUANTIFY how many acres of current grass or dirt will be paved by asphalt. The plan includes *three* new parking lots and 150K square feet of *new* building space. Additional paved parking lots have an impact on water quality, groundwater recharge, and nearby streams. When you pave over the earth to make parking lots, rain no longer falls and seeps into the ground. Parking lots collect grime, oil, and pollutants from under cars.

Then rain washes those pollutants into our streams and gullies, ending in our marshes and the Mare Island Strait.

I want these questions and issues answered/examined:

... how an additional 28 acres of parking and roads in this project will impact Ridler Creek and the water quality in Lake Chabot.

7

... the impact on predatory birds in the area who rely on open areas for hunting and habitat. If we pave over so much of the fairgrounds area, this land will permanently be paved.

8

... the increase in vehicle traffic in the long term that would be due to this project. This project is designed around and for people in cars. The EIR does not consider the total increase in car traffic and emissions over time that will be a result of 18 more acres of parking and 10 more acres of roads.

9

...any "smart growth" alternatives that favor walkable communities, bike paths, larger green spaces and parks. We live in a temperate climate that is conducive to biking and walking for much of the year. Building more parking lots and infrastructure to encourage individual vehicle use in an era of climate change is backwards thinking, and will only lead more GHG emissions into the future. We need walkable communities instead. What if one of the alternatives was a 100-acre urban farm with a retreat space and learning center? The only alternatives examined were scaled down versions of the Solano 360 Plan, plus the "do nothing" alternative.

10

These issues need to be addressed. Putting in more parking and more paving is not in keeping with the trends of the 21st century - addressing climate change, and not exacerbating it; and smart growth, not 1950s-type growth.

11

Thank you.

Julie Charles
191 B Street, Vallejo
Resident since 2001

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Private Individuals and Businesses

Julie Charles (CHA)

Response to CHA-1

The commenter provided introductory remarks. No response is necessary.

Response to CHA-2

The commenter expressed concern that the project could have a substantial adverse effect on federally protected wetlands, as defined by Section 404 of the Clean Water Act. As analyzed in the Draft EIR, the project's impacts to federally protected wetlands, as defined by Section 404 of the Clean Water Act, would be mitigated to less than significant through implementation of Mitigation Measure BIO-3a. No further response is necessary.

Response to CHA-3

The commenter stated a concern that the project could interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of wildlife nursery sites. Draft EIR Impact BIO-4 analyzes the project's potential to significantly interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of wildlife nursery sites.

The literature review that was conducted as part of the Biological Resources Assessment for the Draft EIR provides a foundation on which to conduct the analysis of wildlife movement corridors associated with the Plan Area. Information compiled from the literature review and analysis of aerial photographs and topographic maps provided the basis of the assessment.

Little quantitative data exists on the movements of animals through corridors. A literature review was conducted that included documents on island biogeography (studies of fragmented and isolated habitat "islands"), reports on wildlife home range sizes and migration patterns, and studies on wildlife dispersal. Wildlife movement studies conducted in California were also reviewed. The relationship of the Plan Area to large, open-space areas in the immediate vicinity was evaluated for connectivity and habitat linkages.

Wildlife movement activities usually fall into one of three movement categories: (1) dispersal (e.g., juvenile animals from natal areas, individuals extending range distributions), (2) seasonal migration, and (3) movements related to home range activities (such as foraging for food or water; defending territories; and searching for mates, breeding areas, or cover). A number of terms have been used in various wildlife movement studies—such as "wildlife corridor," "travel route," "habitat linkage," and "wildlife crossing"—to refer to areas in which wildlife move from one area to another. To clarify the meaning of these terms and respond to the concern raised in Comment CHA-3, these terms are defined as follows:

Travel route: A landscape feature—such as a ridgeline, drainage, canyon, or riparian strip—within a larger natural habitat patch that is used frequently by animals to facilitate movement and provide access to necessary resources (e.g., water, food, cover, den sites). The travel route is generally preferred because it provides the least amount of topographic resistance in moving from one area to another; it contains adequate food, water, and/or cover while moving between habitat areas; and provides a relative direct link between target habitat areas. These areas are relatively close to each other and do not contain a regional conduction.

Wildlife corridor: A piece of habitat, usually linear in nature that connects two or more habitat patches that would otherwise be fragmented or isolated from one another. Urban land areas or other areas unsuitable for wildlife usually bound wildlife corridors. The corridor generally contains suitable cover, food, and/or water to support species and facilitate movement while in the corridor. Larger, landscape-level corridors (often referred to as “habitat or landscape linkages”) can provide both transitory and resident habitat for a variety of species.

Wildlife crossing: A small, narrow area, relatively short in length and generally constricted in nature, that allows wildlife to pass under or through an obstacle or barrier that otherwise hinders or prevents movement. Crossings typically are manmade and include culverts, underpasses, drainage pipes, and tunnels to provide access across or under roads, highways, pipelines, or other physical obstacles. These are often “choke points” along a movement corridor.

The Plan Area is adjacent to residential development to the north, south, east, and west. There is an extensive open-space area located to the northeast, just beyond the I-80/SR-37 intersection. However, this large open space area ends at the I-80/SR-37 intersection. Therefore, any wildlife movement within the project site would be described as a travel route for local resident wildlife species. As described above, wildlife movement corridors are narrow sections of habitat connecting two larger, open-space areas. The project site is located at the edge of a large, open-space area and is not part of a local or regional wildlife movement corridor. No edits or modifications to the Draft EIR analysis, findings, or mitigation are required to address this comment.

Response to CHA-4

The commenter expressed concern that the project could directly or indirectly destroy unique paleontological resource or site or unique geologic feature. As detailed in the Draft EIR, no recorded paleontological resources are known to be present within the project site; however, subsurface construction activities associated with the proposed project, such as trenching and grading, could potentially damage or destroy previously undiscovered paleontological resources. This potentially significant impact is reduced to a less than significant level through implementation of Mitigation Measure CUL-3, which requires a standard inadvertent discovery clause in every construction

contract, and which requires that excavations within 50 feet of any fossil discovery be stopped until the discovery is examined by a qualified paleontologist, in accordance with Society of Vertebrate Paleontology standards.

Response to CHA-5

The commenter expressed concern that the project may result in substantial soil erosion or the loss of topsoil, or degrade water quality in downstream water bodies from construction activities. These potential impacts were analyzed in the Draft EIR; specifically, Impact GEO-2 and Impact HYD-1 reviewed the project's potential impacts for the two concerns, respectively. The Draft EIR found these potential impacts were reduced to less than significant with implementation of Mitigation Measures HYD-1a and HYD-1b.

Response to CHA-6

The commenter expressed concern that the acreage of new impervious pavement was not disclosed in the Draft EIR, and that additional paved areas would negatively affect water quality, groundwater recharge, and nearby streams. Impacts HYD-1 and HYD-2 provide the quantification of impervious surfaces under the proposed project. Specifically, approximately 62 of the 149.11 acres within the Plan area are developed with buildings and paved parking lots. Approximately 33 additional acres are developed with a golf course and equestrian racetrack. The remaining 57 acres are generally undeveloped. Project implementation would result in approximately 97 acres of impervious surface or 65 percent of the project site.

Impacts HYD-1 and HYD-2 analyzed the project's potential to degrade water quality in downstream water bodies from construction and operation, respectively. Implementation of Mitigation Measures HYD-1a, HYD-1b, HYD-2a, and HYD-2b would reduce the project's potential impact to downstream water bodies to less than significant. Impact HYD-3 analyzed the project's potential to interfere with groundwater recharge and found that the impact would be less than significant.

Response to CHA-7

The commenter requests how the additional parking and roads would impact Rindler Creek and the water quality in Lake Chabot. As stated above in Response to CHA-6, the project's impacts to downstream water bodies from project operation would be less than significant with implementation of Mitigation Measures HYD-2a and HYD-2b. Therefore, the project's impacts to Rindler Creek and Lake Chabot would be less than significant with mitigation.

Response to CHA-8

The commenter stated that predatory birds in the area rely on open area for hunting and habitat, and expressed a concern for paving portions of the fairgrounds area.

The Plan Area has had a history of disturbance and development for many decades. The disturbed nature of the Plan Area in addition to the proximity of human development have degraded the function and value of the foraging habitat within the Plan Area. The large, open-space area northeast

of the project site contains approximately 28,000 acres of high-quality foraging habitat for a number of different raptor species. Therefore, the loss of extremely low-quality foraging habitat on the project site with little to no long-term conservation value for foraging raptors may be considered an adverse impact for a few local resident raptors, but it is a less than significant impact under the CEQA guidelines. In addition, Mitigation Measure BIO-1b reduces the potential effect to nesting migratory birds and raptors to less than significant. No edits or modifications to the Draft EIR analysis, findings, or mitigation are required.

Response to CHA-9

The commenter stated she wants the increase in vehicle traffic attributable to the project to be examined. Draft EIR Impact AIR-2 analyzed the project's potential to generate a carbon monoxide hotspot from project traffic and found the project would generate a less than significant impact for carbon monoxide. Impact AIR-3 provides a quantification of vehicular emissions that are anticipated to be generated by the project. The emissions analysis incorporates the state-generated emission factors for vehicle startup and running. The impact analysis appropriately accounts for the project vehicle emissions both onsite and offsite. Impact AIR-3 found the impact to be significant and unavoidable even with incorporation of mitigation.

Response to CHA-10

The commenter stated she wants the smart growth alternatives to be examined, and asked about the use of an urban farm with retreat space and learning center. The project provides open space as well as pedestrian and bicycle routes. These public trails, promenades, and bike lanes and paths encourage residents and visitors to get out of their cars and walk, bike, or jog from destinations within and near the Plan area. In addition, the project provides a multi-modal Transit/North Parking Center where commuters can park their vehicles and board buses bound for job centers or other destinations such as the Vallejo Ferry Terminal. However, an urban farm was not included in the alternative's analysis. The primary purpose of an alternatives analysis is to provide decision-makers and the general public with a reasonable number of feasible project alternatives that could attain most of the basic project objectives, while avoiding or reducing any of the project's significant adverse environmental effects. Establishing an urban farm would not achieve the project's objectives, as provided in the Draft EIR and Specific Plan. In addition, CEQA Guidelines Section 15126.6 states that an EIR need not consider every conceivable alternative to a project. No further response is necessary.

Response to CHA-11

The commenter provided concluding remarks to close her letter. No response is necessary.

January 9, 2013

Dear Ms. Heppner,

I am a resident of Vallejo, and I am writing to provide comments on the draft Environmental Impact Report for the Solano 360 Project. Thank you for the opportunity.

1

I have comments in several areas:

Watershed health and water quality

I suggest that the EIR authors state clearly what percentage of the 149.11 acres would be *newly* paved over for the parking lots, new roads, and new buildings. From photographs in the appendices and satellite pictures, it is clear that much of the area slated for paving and building is currently grassy field or other pervious, unpaved surface. I would like the EIR to report the current percentage of the 149.11 acres that is either paved or in buildings versus unpaved as dirt or grass. I would like the EIR to further address what percentage of the land would be paved/unpaved when the project is completed.

2

Knowing the amount of new pavement, asphalt, and built environment is very important to people of my generation. Net additions to the amount of land we pave and build upon create additional runoff into our creeks, lakes, and other waterways. In this case, Lake Chabot will receive direct run off from these newly paved surfaces. As it is now, rain falling onto the grassy fields can seep into the ground and recharge groundwater. New asphalt for parking lots will collect pollutants and oil from vehicles, and rain will send that into Lake Chabot and our waterways as well. If we pave over this land, it will be paved for a very long time—at least for the rest of the century and probably longer.

3

The EIR does not adequately address this total pavement increase, nor the new chemical pollution created by parking lots. The EIR states (Section 3.6, page 18):

The new multi-purpose water feature within Creek Park will retain and improve runoff from the plan area, which can then be re-used onsite for irrigation. ... A majority of the plan area will be designed to drain to the Creek Park water feature for water quality treatment.

But the EIR does not go on to explain *how* the “water feature” will improve runoff from the plan area. Are we to assume it is by dilution? By magic?

Transportation and Smart Growth Considerations

The Solano 360 project is designed for a car-dependent culture, and I believe that is a backwards way to develop. If you build parking lots and roads, you will get more cars. If you build more public transit and true, protected bicycle lanes, you will get more bicycles and public transit riders.

4

I believe the EIR section on transportation (and the specific plan in general) should be upfront about how it realistically expects most people will get there. Section 3.11 has plenty of tables showing expected vehicle traffic volumes, but there is no analysis of how much more demand (if any) for public transit or bike lanes you expect. It seems obvious (from the three new parking lots) that this project is planned for cars, and the attention to bikes and public transit is window-dressing.

In that case, given that most people will arrive by car, why spend resources on a jogging trail (highlighted in the Greenhouse Gas Emissions section)? Who will *drive* to the fairgrounds to go jogging when you can drive as easily to Blue Rock Springs Park or the waterfront to go jogging without breathing Highway 80's smog and particulates? It appears to me that some of these "mitigation measures" are added into the plan without regard for the expected demand for them. If you study vehicle traffic patterns that closely in the EIR, it's worth also studying the expected demand for bicycle lanes and public transit in this area of the city before spending money to build something no one will use.

4
CONT

Greenhouse Gas Emissions (section 3.6)

My concern about section 3.6 is that it does not address the fact that this development is planned for a different era—decades ago—when the nation was encouraging everyone to buy their own vehicles and drive alone. We are transitioning into a new era where we need to PLAN for a future where people live in walkable communities and where public transportation is reliable, abundant, and fast. In Vallejo, we are lucky to live in a temperate climate conducive to biking and walking for much of the year.

5

This section should address the fact that the project plan breaks many smart growth principles that have effects on total GHG emissions. I refer the EIR authors to the EPA's Office of Smart Growth; they provide technical assistance in this area to cities! <http://www.epa.gov/dced/>

Cumulative Effects

Regarding the cumulative effects on biological resources (4.2.3), I disagree with the assessment that "the site has a low biotic value." Compared to other open spaces in Vallejo, I'm sure that is true. However, this section of the EIR is on *cumulative effects*. When you look at the satellite image of the parcel and surrounding land, you will see it contains some of the only open grassy fields in the surrounding area. Indeed, it is part of a corridor connecting the open space east of Highway 80 to the Lake Chabot area and then on to the sloughs and Napa River. Everywhere else around it, between Hwy 80 and Route 29, is paved over in residential and commercial uses. I suspect that paving over the Fairgrounds—a connector area—will have negative cumulative effects on birds in our area in particular. Did ornithologists advise on this section?

6

To seriously address cumulative effects, this section also needs to address the paving versus open space issue. Keeping open space is an economically smart decision for a city. The City of San Francisco could have built out commercial districts and entertainment centers on the Presidio, and that would have brought in money and jobs. However, it was a far BETTER financial decision for the city to maintain the Presidio as open space. People want to live and work in areas with open space, views, and greenery.

7

As noted above, I am very concerned with the treatment of hydrology and water quality in the cumulative effects section (4.2.8). The EIR is simply not specific enough. It states:

Mitigation is proposed that would require implementation of various construction and operational water quality control measures that would prevent the release of pollutants into downstream waterways.

8

I am glad the EIR acknowledges in this section that, "The proposed project would significantly increase the amount of impervious surfaces at the project site." However, then the authors assert that, since the Solano 360 project and "other related projects" will implement drainage plans to meet the City's standards, "would not have a cumulatively significant impact on hydrology and water quality." This is unbelievable. The authors are stating that if everyone follows City of

Vallejo standards for wastewater and drainage, there will be no significant impact. That makes *no sense* in a section addressing cumulative impacts! The City does not set flow control and water quality standards by imagining that every square inch of remaining open space in the city limits is paved over and built out and then figuring out what volume of water everyone can discharge total for there to be no significant negative impact to our waterways and urban ecosystems.

8
CONT

I suggest the authors look up studies (I'm sure they are out there) that quantify the amount of pollutants that runs off a given area of asphalt in parking lot use per year. In addition, the authors could also easily look up the biggest rain events we receive in Vallejo on average to figure out the volume of stormwater runoff that these 30+ additional acres of parking and roads and 50+ acres of buildings will produce in a major rain event. It would be a pretty simple calculation and it would inform the cumulative effects discussion greatly.

Alternatives to the Proposed Project (Section 5)

I am concerned that the alternatives examined were all scaled down versions of the Solano 360 Plan, plus the “no project” alternative. I suggest a different alternative be considered: one that includes updates to the fairgrounds, plus a 60-80 acre urban farm and learning center in a park-like setting. Examples from the National Park Service and East Bay Regional Parks in the San Francisco Bay region shows that retaining open space and investing in green spaces is an economic driver for communities. People *want* to live near green, open space and gardens – surrounding home prices go up when parks are built and maintained. An urban farm could also bring in money as a learning center and retreat, and this would be a truly unique asset for Vallejo. Please consider an alternative that is simply a facelift and revamp for the County Fairgrounds plus a park and urban farm.

9

Thank you very much for your consideration of my concerns.

Best regards,

Amanda Cundiff
117 B St. Vallejo, CA 94590
(415) 342-1492

Amanda Cundiff (CUN)

Response to CUN-1

The commenter provided introductory remarks. No response is necessary.

Response to CUN-2

The commenter requested that the current amount of pavement, roads and buildings (impervious surfaces) be quantified, and the new amount impervious surfaces be quantified. The commenter specifically requests the amount be provided as a percentage of the total project area. Refer to Response to CHA-6 for further discussion.

Response to CUN-3

The commenter stated that the Draft EIR does not adequately address the increase in pavement or the potential for chemical pollution created by the parking lots. The commenter stated that the Draft EIR does not explain how the water feature would improve runoff from the Plan Area.

Impacts to water quality were analyzed in Section 3.8, Hydrology and Water Quality. Refer to Responses to CHA-6 and CHA-7. As stated on Draft EIR pages 3.18 and 3.19:

The design of the water feature would be intended to provide good water quality at all times to the maximum extent practicable, so that any excess runoff to the lake would result in the discharge of relatively clean lake water to the receiving water downstream. Accordingly, a decrease in urban runoff pollutants discharged to the receiving water as a result of the proposed project is anticipated (PACE Advanced Water Engineering, 2011). In addition, other water quality improvements such as biotreatment facilities would be implemented throughout the plan area. Water quality improvements for the plan area would be constructed in accordance with the Bay Area Municipal Regional Permit (MRP).

The proposed water feature would have a stormwater treatment function that could utilize biologic processes for treatment of urban pollutants in runoff as well as maintaining the normal health of the aquascape system. The water quality treatment features incorporated into the new lake system would include: aeration, lake biofilters, wetland planters, and vegetated pretreatment basins or wetland filters. According to a technical memorandum prepared by PACE Advanced Water Engineering to evaluate the proposed water feature, together these features would function as an effective system to manage the urban storm runoff quality and the health of the new water feature to ensure that any discharges to the adjacent Lake Chabot would have an improved quality (PACE Advanced Water Engineering, 2011). Moreover, these water quality elements would work either through management of urban stormwater runoff or through water feature water quality maintenance, to ensure that the water within the proposed water feature and any

discharge from the proposed Solano360 development is of the same or better quality than that discharged prior to development

Mitigation is proposed that would require the project applicant for the entertainment and open space area to prepare and submit a stormwater quality management plan to the authority having jurisdiction for review and approval prior to issuance of building permits for the proposed project. The plan would require the project applicant to document various stormwater quality control measures, including the Vallejo Municipal Code, consistent with the NPDES provision C.3 standards, that would be in effect during project operations to ensure that runoff associated with operational activities would not contribute to the degradation of water quality in downstream waterways, particularly those with TMDLs in effect.

Response to CUN-4

The commenter expressed a concern about vehicular traffic, and the demand for public transit and bicycle lanes. The commenter's concern regarding the likely relative use of the auto travel mode vs. bus, bicycle, and pedestrian modes is noted. The Draft EIR does not provide estimates of transit, pedestrian, and bicycle trip generation, because such estimates would be highly speculative given the nature of the project uses. However, the Draft EIR does describe the facilities provided onsite and through mitigation to serve those modes, and concludes that the resulting impacts to pedestrians, bicyclists, and transit riders is less than significant. Draft EIR Impact TRANS-7 found that the project would provide adequate access to alternative modes of transportation and, therefore, would result in a less than significant impact for alternative transportation. No further response is necessary.

Response to CUN-5

The commenter provided a general concern for the design of the project as breaking smart growth principals that effect on total greenhouse gases. The commenter's concern about smart growth principles is noted. However, the Draft EIR does not analyze the project's consistency with Smart Growth principles. The purpose of the greenhouse gas analysis is to provide disclosure and analysis of the project's potential greenhouse gas emissions generation and consistency with adopted greenhouse gas plans. Refer to Response to CHA-10. Furthermore, Mitigation Measure GHG-2 includes multiple components that support bicycle and pedestrian travel.

Response to CUN-6

The commenter expressed a concern about the loss of open space and the effect on birds. The commenter asked if an ornithologist advised the preparation of the Draft EIR Biological Resources Section. Refer to Responses to CHA-3 and CHA-8 for further discussion.

Response to CUN-7

The commenter recommended the cumulative impacts section address paving. However, the commenter did not provide an environmental impact topic of concern. No further response is necessary.

Response to CUN-8

The commenter stated disbelief that compliance with the City of Vallejo standards for wastewater and drainage would result in a less than significant cumulative impact for hydrologic and water quality impacts. The commenter recommended that Draft EIR authors find studies on quantification of pollutants from asphalt surfaces as well as calculate the maximum runoff that could occur from a major rain event to help inform the cumulative impact analysis. The cumulative impact discussion builds from the project-specific impact analyses contained within the Draft EIR.

Refer also to Response to CUN-3. In addition, the Draft EIR describes how the National Pollutant Discharge Elimination System (NPDES) stormwater permitting programs regulate stormwater quality from construction sites. Under the NPDES permitting program, the preparation and implementation of Stormwater Pollution Prevention Plans (SWPPPs) are required for construction activities that disturb more than 1 acre in area. The SWPPP must identify potential sources of pollution that are reasonably expected to affect the quality of stormwater discharges and must identify and implement Best Management Practices (BMPs) that ensure the reduction of these pollutants during stormwater discharges. Federal and state law provide that BMPS must achieve specific, quantitative effluent limitations, and monitoring and reporting requirements will apply.

Mitigation Measures HYD-1a and HYD-1b require the project applicant to prepare and implement an SWPPP prior to the issuance of grading or building permits. The implementation of these mitigation measures would ensure that runoff associated with short-term construction activities would not contribute to the degradation of water quality in downstream waterways, particularly those with Total Maximum Daily Loads (TMDLs) in effect.

Mitigation Measures HYD-2a and HYD-2b require the project applicant to prepare and submit a stormwater quality management plan to the authority having jurisdiction for review and approval prior to issuance of building permits for the proposed project. The plan would require the project applicant to document various stormwater quality control measures, including the Vallejo Municipal Code, consistent with the NPDES provision C.3 standards, that would be in effect during project operations to ensure that runoff associated with operational activities would not contribute to the degradation of water quality in downstream waterways, particularly those with TMDLs in effect.

It can be assumed that if the project does not contribute to the degradation water quality in downstream waterways, then the project similarly would not result in a cumulative degradation of downstream waterways.

Impact HYD-4 addresses the design of stormwater facilities on the project site. Onsite drainage systems within the streets would be designed in accordance with City and Vallejo Sanitation and Flood Control District (VSFCD) standards. Underground pipes would be designed to accommodate 15-year storm events. Surface flow in the streets would be designed to accommodate 100-year storm events by directing water to the onsite water feature or fairgrounds channel. New stormwater pipelines would be constructed in each backbone roadway providing service to each parcel. Existing pipelines that traverse the project site would be relocated as necessary to avoid conflicts with development. These proposed drainage improvements would ensure that less than significant, project-related runoff would enter downstream waterways during a peak storm event. With the implementation of these improvements, as identified in the Plan, drainage impacts would be reduced to a level of less than significant.

Response to CUN-9

The commenter suggests the use of an urban farm and learning center as an alternative to the proposed project. Refer to Response to CHA-10 for further discussion.

Chryss Meier - Re: Lake Chabot

From: Claudia Quintana <cquintana@ci.vallejo.ca.us>
To: doug <ddf4life@sbcglobal.net>
Date: 12/5/2012 8:29 AM
Subject: Re: Lake Chabot
CC: Craig Whittom <cwhittom@ci.vallejo.ca.us>, Franz Nestlerode <fnestlerode...>

Good morning Doug,

Preliminarily, I would be surprised if the 360 project serves to affect riparian rights. Vallejo, (and other agencies) get their water by virtue of a water service contract between the U.S. Bureau of reclamation and the Solano County Water Agency (of which Vallejo is a member). However, by way of this email I am forwarding your email to Franz, the Water Superintendent, and to Inder, the attorney assigned to the 360 project, to review your email and keep that in mind as they review/comment on the 360 report.

Thanks for your comment.

Claudia M. Quintana
 City Attorney
 City of Vallejo
 (707) 648 4545

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>>> doug <ddf4life@sbcglobal.net> 12/4/2012 9:16 PM >>>

Hello Claudia,

I have some concerns about the water situation with Chabot. While reviewing the Solano 360 Draft EIR, i noticed the County on several occasions referred to "entitlements" when water rights were not invoked, enforced, upheld, contracted, etc. Frankly, i don't trust the County.

My point is this, there is a chance, by doing nothing, we are going to give up the right to "exercise our right to charge for water" Don't think for a minute the County wouldn't jump on an opportunity of another 50 years of free water!!

I hope we are taking into any such legal ramifications of this nature?

TY,
 DD,
 FOLC

Doug Darling (DOUG)

Response to DOUG-1

The commenter expressed concerns for the County's use of water rights to achieve free water. Comment noted. The City of Vallejo and other agencies get their water through a water service contract between the U.S. Bureau of Reclamation and the Solano County Water Agency (of which City is a member). The project's Draft EIR is not an appropriate document or tool to analyze the County's plans or lack of plans to modify countywide water services, except where such plans or lack of plans would affect the project's potential environmental impact. No further response is necessary.

Chryss Meier - Solano 360 draft EIR comments

From: Kim <king@napanet.net>
To: "Heppner, Michelle" <MHeppner@SolanoCounty.com>
Date: 1/10/2013 4:55 PM
Subject: Solano 360 draft EIR comments
Attachments: solano360EIR; solano360EIR.cwk

January 10, 2013

Dear Ms. Heppner,

I am a resident of Vallejo, and I thank you for the opportunity to comment of the draft EIR for the Solano 360 project. | 1

I have many concerns about the draft EIR a few are: increased traffic congestion in the area, decreased air quality in an area that already has poor air quality, visual blight, impact on the birds/wildlife in the area. | 2

I fully concur with my neighbors compelling examination of the EIR.

- how an additional 28 acres of parking and roads in this project will impact Ridler Creek and the water quality in Lake Chabot. | 3

- the impact on predatory birds in the area who rely on open areas for hunting and habitat. If we pave over so much of the fairgrounds area, this land will permanently be paved. | 4

- the increase in vehicle traffic in the long term that would be due to this project. This project is designed around and for people in cars. | 5

The EIR does not consider the total increase in car traffic and emissions over time that will be a result of 18 more acres of parking and 10 more acres of roads. | 5

- any "smart growth" alternatives that favor walkable communities, bike paths, larger green spaces and parks. What if one of the alternatives was a 100-acre urban farm with a retreat space and learning center? | 6

The only alternatives examined were scaled down versions of the Solano 360 Plan, plus the "do nothing" alternative. | 6

I believe the draft EIR needs further study. | 7

Thank you for your consideration.

Kim Geddes

Kim Geddes (GED)

Response to GED-1

The commenter provided introductory remarks. No response is necessary.

Response to GED-2

The commenter provided a preface to subsequent detailed comments. Refer to Responses to GED-3 through GED-6, below.

Response to GED-3

Refer to Response CHA-7 for further discussion.

Response to GED-4

The commenter expressed a concern for predatory birds and the potential effect of paving over portions of the fairgrounds. See Responses to CHA-3 and CHA-8 for further discussion.

Response to GED -5

Refer to Response to CHA-9 for further discussion.

Response to GED-6

Refer to Response CHA-10 for further discussion.

Response to GED -7

The commenter stated that the Draft EIR needs further study. Comment noted. Please refer to Responses GED-3 through GED-6, above. No further response is necessary.

KNUDSON ENGINEERS & CONSTRUCTORS, INC.

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January 8, 2013

Solano County Government Center
675 Texas Street, Suite 6500
Fairfield, CA 94533-6342

Attn: Michelle Heppner
Legislative, Intergovernmental and Public Affairs Officer

SUBJECT: SOLANO 360 PROJECT DRAFT EIR

COMMENTS ON BEHALF OF:
BERNICE ROBERTSON
NEWELL'S MOBILE CITY
fka NEWELL MOBILE HOME PARK

Newell's Mobile City, et al., is hereby submitting the following as comments on the subject Draft EIR.

The recent rains of December 2, 2012 and the subsequent site inspection revealed flooding to significant depths of water throughout many areas of the mobile home park. It has been reported, and documents were reviewed, that verified there have been several major flooding events during the past years. The past years include, as is shown on a 1965 aerial photo versus an older photo, the major drainage that was revised on the Fairground property. After this major grading was performed and Rindler Creek rerouted Southerly around the exterior of the Fairgrounds property, it contributed substantially to flooding during major rainstorms. Prior to this grading Rindler Creek ran Westerly through the center of the Fairgrounds property to Lake Cabot.

After this grading diversion occurred it caused substantial amounts of flooding from Rindler Creek at the area where it joins Blue Rock Springs Creek along Coach Lane. This is at the South end of the Fairgrounds that is also the North end of the mobile home park. This Southerly loop of Rindler Creek around the Fairgrounds is also poorly maintained and causes the water to be dammed up and not adequately flowing into Lake Cabot. The water can dam up to approximately 2 feet or more in depth as it again occurred last December.

As has been reported and it is realized, there may be restrictions by the Department of Fish and Wildlife as far as clearing the brush, removing silt, and other substantial quantities of debris. Although, this inadequate drainage condition could have been anticipated with the minimal creek flowline slope and the then expected damming and flooding.

1

In conclusion, this appears to be an opportunity to correct the inadequately constructed creek channels and:

- Provide a properly designed creek flowing through the Fairgrounds in its original location.
- Provide a properly designed and constructed creek channel along the Southerly and Westerly portion of the Fairgrounds property to alleviate the damming and flooding along Coach Lane and into the mobile home park.

Thank you for your consideration of these comments. If you would like further information, please feel free to contact us.

Sincerely,

Knudson Engineers & Constructors, Inc.



Darrell L. Knudson, President
Consulting Engineer, RCE 21049

Knudson Engineers & Constructors, Inc. (KEC)

Response to KEC-1

The commenter provided background information concerning flooding in the project area and possible restrictions for clearing brush, removing silt, and other substantial quantities of debris from waterways. No response is necessary.

Response to KEC-2

The commenter expressed that the project appears to be an opportunity to correct inadequately constructed creek channels to provide a properly designed creek and alleviate damming and flooding along Coach Lane and the mobile home park. Comment noted. The Solano360 Specific Plan calls for drainage improvements based on hydrology and hydraulic calculations documented in the Vallejo Sanitation and Flood Control District (VSFCD) Master Plan; improvements should lower the maximum hydraulic grade line to help alleviate flooding along Coach Lane and within the Newell Mobile Home Park. It is the goal of the project to make improvements to the creek system to alleviate flooding in the southern portion of the site. Proposed improvements to Rindler Creek are described in Section 2.0, Project Description of the Draft EIR.

Chryss Meier - Fwd: Fairgrounds project

From: "Heppner, Michelle" <MHeppner@SolanoCounty.com>
To: Jason Brandman <jbrandman@brandman.com>, Jason Hade <JHade@brandman.com>
Date: 1/6/2013 11:43 AM
Subject: Fwd: Fairgrounds project
CC: "Curry, Bernadette S." <BSCurry@SolanoCounty.com>, "Huston, Nancy L." <N...

All,

Input from a resident. I have responded to her that her input has been forwarded to the project team for consideration.

Michelle Heppner

Legislative, Intergovernmental and Public Affairs Officer

[675 Texas Street, Suite 6500](#)

[Fairfield, CA 94533](#)

[Direct \(707\) 784-3002](#)

[Cell \(916\) 838-7176](#)

[Fax \(707\) 784-7975](#)

mheppner@solanocounty.com

www.solanocounty.com

Begin forwarded message:

From: Shirley Larsen <sychelseab@hotmail.com>
Date: January 5, 2013, 10:47:48 PM PST
To: "mheppner@solanocounty.com" <mheppner@solanocounty.com>
Subject: Fairgrounds project

Ms. Heppner,

I am a resident of Vallejo. I live on Parkview Terrace, which backs onto Dan Foley Park. | 1

I am very alarmed when I read the EIR particularly relating to noise. It seems that the only noise considered is that which will occur during construction. Have I missed something?

I am concerned about the noise from entertainment and concerts. My neighbors fought a long battle with Six Flags concerning noise limits which were not upheld. No one in the city seemed inclined to enforce the rules about sound abatement which were written into the original agreement. Six Flags still conducts loud programs, but they are not as frequent or quite as loud. I do not want to have another battle with another entertainment agency. | 2

You can only understand this irritation if you live in my neighborhood and your peace is disturbed with loud, beating, screaming noise. Even if it is in the afternoon, it is totally noxious and unacceptable.

Please read up on the suits which have occurred against Shoreline Park. I hope that this

doesn't have to come to pass for the fairgrounds.

2
CONT

Please consider not condemning a Vallejo neighborhood to something which should never occur and which can be avoided with correct planning.

3

Shirley Larsen

Shirley Larsen (LAR)

Response to LAR-1

The commenter provided introductory remarks. No response is necessary.

Response to LAR-2

The commenter expressed concern for potential noise impacts related to the project. Specifically, the commenter requested analysis of noise from project construction and from entertainment and concerts during project operations.

Regarding the commenter's first statement, construction-related noise impacts were addressed under Impact NOI-1 on pages 3.9-26 through 3.9-28 and again under Impact NOI-4 on pages 3.9-48 to 3.9-49 of the Draft EIR.

Regarding the commenter's second statement, operational noise impacts were addressed under Impact NOI-1 on page 3.9-28, starting on the bottom half of that page, and continuing through to page 3.9-30 of the Draft EIR. The potential for significant noise impacts from the project's entertainment area was also addressed under Impact NOI-3, on page 3.9-33 of the Draft EIR. Page 3.9-29 of the Draft EIR noise section states:

It is unknown what type of concert events would be scheduled at the amphitheater, other than "family" events; therefore, heavy metal and/or punk concerts (which are generally louder than other forms of music) are not anticipated at the venue. The closest existing sensitive receptors would be the residential uses along Griffin Drive, north of SR-37, located approximately 1,470 feet to the north of the amphitheater area. To estimate the potential for open-air concert noise impacts, reference noise levels from a CURE concert at the Pasadena Rose Bowl were used. The Rose Bowl stadium covers approximately 11 acres and can seat more than 90,000 fans. The noise levels generated at a distance of 1,100 feet from the stage of a 1992 CURE concert were approximately 66.2 dBA. Without consideration of any attenuation or topography, at a distance of approximately 1,470 feet from the source, the noise level from a concert of similar size would be approximately 63 dBA. The proposed amphitheater is much smaller than the Rose Bowl and would require less amplification to reach fans in the back rows. Although music would be audible, the concert-related noise would not exceed maximum noise levels already experience in the project vicinity (see Table 3.9-2). Therefore, concert-related noise impacts to existing, adjacent residential uses along Griffin Drive are not anticipated.

As stated above, the commenter resides along Parkview Terrace. The home along Parkview that is closest to the project boundary is approximately 2,664 feet from the site. The project's amphitheater would be located at least 4,480 feet from the closest residence. At this distance, (not accounting for intervening structures or topography) the noise generated by a concert (of similar size to the CURE

concert referenced in the Draft EIR) would be approximately 54 dBA, below the 60-dBA exterior residential standard. Even at 2,664 feet, the noise level from a large concert would be approximately 58.5 dBA, still below the 60-dBA standard.

The Rose Bowl is 11 acres; the project's amphitheater is approximately 1.3 acres, approximately 8 times smaller than the Rose Bowl; therefore, as stated in the Draft EIR, less amplification would be needed to reach the fans in the back rows and the crowds would be much smaller. Furthermore, the amphitheater stage is angled to project the amplified music in a northeasterly direction toward the freeway, away from residential uses.

As stated in the Draft EIR, noise impacts from entertainment and/or concerts are anticipated to be in the range of 55 to 60 dBA, below or at the 60-dBA exterior residential noise standard, and although noise from these activities would potentially be audible, the noise levels are not considered significant. No further mitigation is necessary or required.

Response to LAR-3

The commenter stated an opinion regarding the project. Comment noted. Refer to Response to LAR-2. No further response is necessary.

January 10, 2013

Michelle Hightower
Annette Taylor
Economic Development Dept.
City of Vallejo

Dear Ms. Hightower and Ms. Taylor,

I am writing to you as a resident of Vallejo and local business owner. I wish to comment on and express some concerns about the Solano360 EIR and Fiscal Impact Analysis (11/9/2012). There are also some specific questions embedded in my remarks which should be passed on to project planners.

1

1. Changes from the Original Project Vision

The Solano360 Specific Plan claims to be consistent with the original Project Vision (p. 12), but actually rejects it. I brought this to the attention of the City Council in a letter dated 11/13/2012. I have attached a copy for public record.

The contradiction has at least two implications:

* It is unclear what is the legal basis for going forward with the project, or at least those parts which concern entitlements and expedited permitting. Those rights were granted by City Council with an understanding that the Project Vision (as described in the June 2009 Visioning Report) would serve as the basis to move forward (2/9/2010 MOU).

* The Specific Plan and attendant documents state the process has followed public outreach and comment. That is arguable with regard to the Project Vision. And also beside the point. *The Specific Plan is not the same.* Financing is very different, as is the mix of uses for the property. The Specific Plan was released to the public on 11/9/2012, about 3-1/2 years after the Visioning Report.

2

The only significant public comment occurred at the joint City Council/Planning Commission meeting on 1/7/2013, and it was not supportive, as reported in local press. There was no opportunity whatsoever for the public to provide *input* about the land uses that are described in the Specific Plan, including the new 30-acre parcel for an amusement park, the added garages and parking lots, the absence of a retail (anchor) tenant, and the reduction of other retail components by approximately 75%.

Note: A Solano360 meeting was announced on 11/3/2012 and held on 11/15/2012. The Specific Plan was released a few days prior to that meeting. Probably because the public did not yet know of the changes in the plan, only one person showed up, as reported in local press.

2. Errors in the Fiscal Impact Analysis

Much of the Fiscal Impact Analysis is based on the reverse economic logic that supply drives demand (p. 16). Even if we accept that notion, the Analysis uses per-square-foot revenue figures published in 2008 and based on data from an earlier period. The Gruen+Gruen Marketing Study commissioned by the County made it clear that those days are not coming back, even if the economy improves. Thus, at least some of the revenue that the Fiscal Analysis projects for the next 50 years is based on assumptions that we already know are wrong.

3

The Fiscal Impact Analysis includes many other unsupported, or unsupportable, assumptions, such as: the 30-acre amusement park parcel will generate revenue based on its size *in proportion to* Six Flags Discovery Kingdom, and the city will collect the same 2.5% entertainment tax on park entrance (p. 165); and the revenue from the exposition hall will increase *proportionately* as it grows from 20,000 to 100,000 sq ft (p. 165). This kind of proportional reasoning is not likely to hold up under peer review. It does not even seem logical. If it were, then there would be no limit to how large the amusement park parcel or expo hall could grow!

Another mistaken assumption is that "entertainment uses will likely generate demand for support uses such as restaurants, retail stores and hotels" (p. 13). This seems wrong for several reasons: one, it may double count revenue. Much of the support uses that the statement refers to are provided by the entertainment use itself, such as food and gift purchases inside Six Flags, or food purchases inside an event at the exposition hall.

Second, my own research shows that there is very little spillover business from theme parks, as I pointed out at the 1/7/2013 Council Meeting. This is borne out by a close look at the major theme parks in the U.S. Almost without exception, they are encircled by mostly undeveloped land. In a few cases, they are surrounded by warehouses or industrial operations (e.g., Carowinds near Charlotte), or in one case by a shopping mall (Fiesta in San Antonio), but in this one case, the park entrance is separated by a great distance. The notable exceptions are older parks in the middle of major metro areas, like Los Angeles and Tampa Bay (Busch Gardens), but they are largely encircled (and walled off!) from residential neighborhoods. I have not been able to uncover a single example besides Disneyland for which there is any synergy between a theme park and a major restaurant/retail/entertainment development across the street.

Possibly other events, as would occur at the expo hall, would create spillover business, but then the analysis may be wrong for a third reason: the spillover business may already be served by other restaurants and retail establishments in Vallejo, or those restaurants and retail establishments may already have enough capacity now for meeting the additional demand. (It may be *excess* capacity because of the down economy.) The Fiscal Impact Analysis completely overlooks this critically important topic of "net gain". As a result, it also overlooks the tax implications for Vallejo, if the same services that local businesses are currently able to provide (because of existing capacity) shift to the fairgrounds. Since supply does not create demand, the net gain is questionable; it should have been part of the Fiscal Impact Analysis.

Lastly, with respect to revenue from a larger expo hall, the Fiscal Impact Analysis contradicts the Gruen+Gruen Marketing Study. The study clearly states that there is not enough existing demand for conferences, events or shows to support a larger expo hall, there is stiff competition, and the situation is worsening. Possibly a new amusement park would increase demand for hotel rooms, if visitors want go to it and Six Flags, though that's an untested assumption. But the expo hall won't generate those stays. The G+G study says the radius of visitors for the expo hall will be less than 100 miles and mostly from within the County (again raising the issue of net gain). The study concludes its section on the expo hall by saying *it will almost certainly require a subsidy to be economically viable*. I have attached the relevant 20 pages and highlighted certain key statements.

In conclusion, one of the most important points to make about the Fiscal Impact Analysis is that it has not been subject to any independent review. The numbers are being provided to the City by consultants working for the County, which not insignificantly happens to be the *opposing party* in revenue sharing

negotiations. As mentioned above, the Specific Plan is not the same as the plan in the Visioning Report, which *was* subjected to review about six months after it was accepted by City Council. It is not only prudent but an act of due diligence for City Council to subject the current plan to independent review before any vote to accept it.

3
CONT

1.3 Parking Issues

The recent changes to the Vision Plan, as proposed in the Specific Plan, complicate an already difficult situation with respect to parking.

There are several inherent dilemmas that affect the Fiscal Impact Analysis, viability of the project, and even the stated purposes, such as there being a public use area. These mainly come down to free vs. paid parking. This issue is not addressed at all in the Specific Plan, but it should be; it is not something that can be put off until later, because it touches on every part of the proposal and its underlying assumptions.

There are basically three options for parking in the various lots and garages: free, paid or validated. Some portion may be free, but then the question is how it will be patrolled. Free parking spaces within a reasonable walking distance of Six Flags will be sought after by visitors to the park. This has two implications: it takes away revenue that Six Flags depends on (and for that reason is likely to be resisted, rightfully so, by Six Flags management); and it makes running a business anywhere near the park difficult, perhaps impossibly so.

Paid parking is not necessarily a solution. It would have to be competitive with Six Flags' rates to prevent the competition cited above. Yet it will not be possible to do this if restaurants and Family Entertainment Centers are to be viable. Even highly successful developments like Bay Street in Emeryville, which do charge for parking, keep rates around \$5. I could not find any example of a Family Entertainment Center like Scandia charging anything for parking. (Most likely FECs will want to locate elsewhere if there's a charge.)

4

To fully understand this dilemma, one only needs to speak with the Marriott Courtyard Hotel across from Six Flags, which I would guess has to patrol its lot, or residents of the Crest near Sage Street. My understanding from those residents is that Six Flags visitors are frequently looking for free parking on neighborhood streets, which causes traffic problems and other conflicts. These same sorts of conflicts may dissuade restaurants and retail establishments from locating in the EMU area.

(Similar issues arise with employee parking. Six Flags currently provides its own parking. Possibly the employee parking for surrounding businesses can be *permitted* parking, but then additional patrolling may be needed.)

Validation does not appear to be a viable solution for several reasons. First, it would substantially reduce the parking lot revenue that is projected in the Fiscal Impact Analysis. Second, it raises the question, for how long? Third, it may eliminate any pretense of there being public space at the fairgrounds, as people could not go there---or at least not drive there---without having to purchase something. Finally, the free vs. paid parking question further calls into doubt the revenue projections for the enlarged expo hall. When events are held at the current hall, parking is typically free (that is, apart from County Fair events). If there is a charge for parking for future events, small or large, this may negatively impact the fairgrounds' ability to attract those events. The enlarged expo hall would be competing with the many small- to medium-sized venues that offer free parking.

4. Alternatives to the Proposed Project

There is a viable project alternative that was not, but should have been, considered. It is a major youth and amateur sports complex. I will not discuss the merits here, but simply explain how it was rejected, more or less arbitrarily.

I put together a proposal for a sports complex at the time of the first Solano360 public forum, in March 2009. I was not allowed to present the proposal at that or any subsequent public forum, as a project alternative, so I scheduled a separate meeting with two project consultants in April 2009, Wanda Chihak and Jason Keadjian. We had a meeting on 4/27/2009 and I handed the consultants my proposal (copy attached). There was never an opportunity at any subsequent Solano360 meeting, or any other City or County meeting, to present the proposal in any formal manner or respond to any questions about it.

In June 2010, I met with a Councilmember, Stephanie Gomes, and the Project Manager, Tom Sinclair. I showed Mr. Sinclair my proposal and gave a brief presentation. He said it would not be considered by project planners. I asked about the marketing study that was about to be released, specifically: if the marketing study was not favorable, would I then have an opportunity to introduce the proposal. He again said no.

Later, at an August, 2010, Solano360 meeting, I asked the consultant who did the marketing study if a sports complex were studied as a possibility for the fairgrounds. He stated that it was not. During the public forum, I brought up the idea and received enough interest for it to be placed on the agenda for a subsequent meeting, to be held in September. That meeting never occurred; it was cancelled without notice or explanation.

Since a sports complex is a use very similar to what is proposed, it is surprising that it would not be considered. This is especially true because the marketing study hints at it, with terms like entertainment/recreation. It should have been duly considered, as it has many advantages over the current plan.

Note: the sports complex was rejected in the original Vision Report, which subsequently was itself rejected. In fact, the Vision Report was characterized as sloppy work by a County Supervisor at a December Board meeting, so one wonders what to make of any of its conclusions. I would respond to the appendix in the Vision Report (two pages that discuss a sports complex) if it were attached to the Specific Plan.

Thank for you considering these comments. I welcome any opportunity to discuss the project alternative (a sports complex), answer questions about the information I have presented here, or provide other supporting documentation.

Dan Levin
707-554-6505 ext. 111
707-645-9461 home
33 Santa Paula Way
Vallejo, CA 94590

5

6

Attachments

1. Letter to Council
2. Pages from Gruen+Gruen Study regarding expo hall
3. Alternative proposal for the fairgrounds (sports complex)

13 November, 2012

Dear Vallejo City Councilmember,

As you know, I've been closely following the Solano 360 (fairgrounds) project since the first public forum in April 2009. I wish to call your attention to some fiscal and legal problems that have arisen with the just-released Solano 360 Specific Plan, EIR and Fiscal Impact Analysis.

The problems arise for a simple reason: the Specific Plan does not conform to the Project Vision. One of the documents, the EIR, comes to the same conclusion, as I explain below.

The Specific Plan deviates from the Project Vision in many ways. A list is attached, along with pages from official documents. Here is a quick summary:

- The retail/commercial part of the project has been scaled down by more than two-thirds, compared to the land use description in the Solano 360 Vision Report. Hotels are gone. Office space is gone. In place of those things is about 20% more parking, including a multi-level garage.
- The project no longer includes a major anchor tenant. The 150,000 sq ft entertainment retailer proposed for the north end—one of the main revenue generators—is gone, leaving only a 100,000 sq ft exposition hall for phase one. (The hall will be built with \$65 million in County-issued bonds, about twice as much as originally envisioned!)
- The City of Vallejo will need to issue \$24 million in municipal bonds before the project can enter phase two. It will take 30 years to repay this debt, according to the Fiscal Analysis. And the debt service will be *in addition to* a split of sales tax with the County. Vallejo's debt obligations in the original plan: exactly \$0.

For about 18 months, since a not-very-supportive marketing study was released, project consultants and County officials have said that the changes are actually a "refinement". The EIR contradicts those statements. The EIR calls the Vision Plan an "alternative". More incredibly, it comes to this conclusion:

5.6.1 - Vision Plan

Subsequent to development of the Vision Plan and prior to preparation of the [Specific] Plan, a market demand study was conducted by the County (Gruen Associates, 2011). Among other findings, the market demand study forecast that development of retail commercial land uses depicted in the Vision Plan could compete with local retail commercial uses to point of potentially causing store closures, thereby contributing to urban blight. Because of the lack of a sufficiently strong market for retail commercial uses and the potential for causing urban blight, *the Vision Plan was rejected as a project alternative*. [emphasis mine]

Prior to the release of the marketing study, all of the resolutions adopted by the City Council and Board of Supervisors, as well as agency reports, emphasized a “shared commitment to implement the Project Vision”, and the Vision Report (accepted by both parties in June 2009) shall guide the Specific Plan and entitlement process. This policy was made concrete in the City/County revised MOU of 2/9/2010. See section 6b among others: “The Project Vision will serve as the basis to move forward with the completion of a specific plan and for the development of the Project Description for purposes of beginning the environmental review.”

Now, twenty months later, the consultant who did the environmental review tells us the Vision Plan that he was supposed to review was, at some unknown time, rejected. This situation is almost surreal. It makes me wonder:

- Does the City-County MOU still govern the process, or have the parties entered into another agreement that may be described euphemistically as “less public”?
- In three and a half years, why were Vallejo residents never told about the \$24 million in bonds necessary for the project? Was this information held back until the city emerged from bankruptcy? Was it known to Council?
- When did the consultant reject the original plan, what kind of notice was given to the Solano 360 oversight committee, and why did the process go forward without a new Vision Report being approved by the City and County?

The above questions are not academic. They raise serious concerns about whether the MOU in general, or the quitclaim and entitlement sections in particular, are still binding on either party. The former is relevant to the CEQA process, the latter to reimbursements.

You might recall that the City of Vallejo, in its 1/25/2011 amended MOU, agreed to reimburse the County for direct and indirect expenses related to the fairgrounds redevelopment project, and it gave the County a “vested right” to entitlements. Some \$4.5 million has already been spent on the Vision Report and the documents described in this letter. That money was all borrowed by the County from its general fund.

Significantly, the Fiscal Impact Analysis does not include the \$4.5 million already spent on the project—it says so explicitly in the document—and provides no details about how that debt will be repaid. Is Vallejo on the hook for it, even if the plan has changed? The answer may possibly explain why consultants and County officials have been so adamant that the Specific Plan is just a refinement of the original plan.

I should conclude by saying that this letter is not about the merits of the project. That’s a debate for another time. My concerns are about fiscal responsibility and whether the Vallejo City Council is properly protecting the interests of its residents. I don’t claim to speak for everyone, but I think we can all agree:

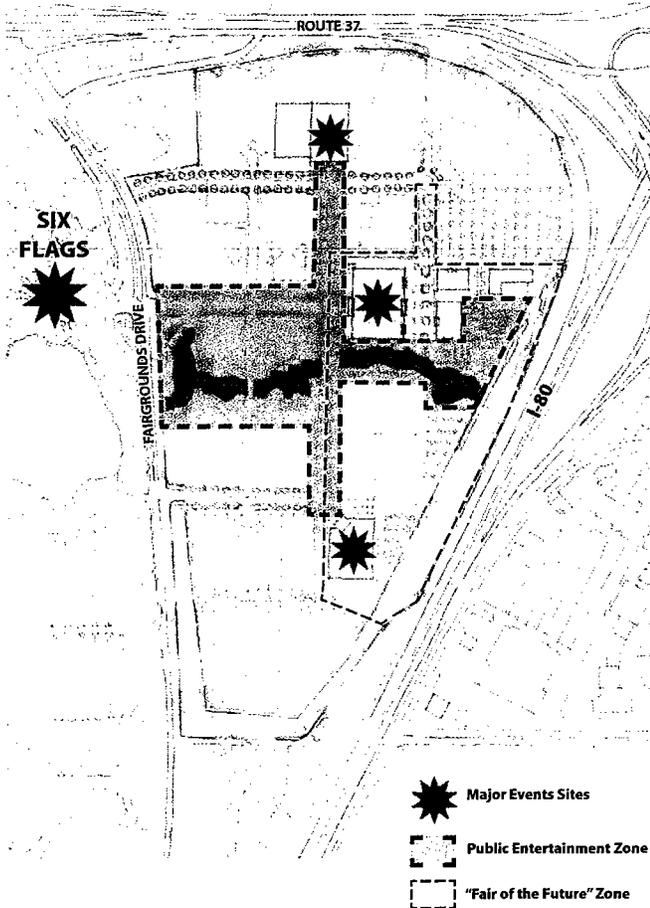
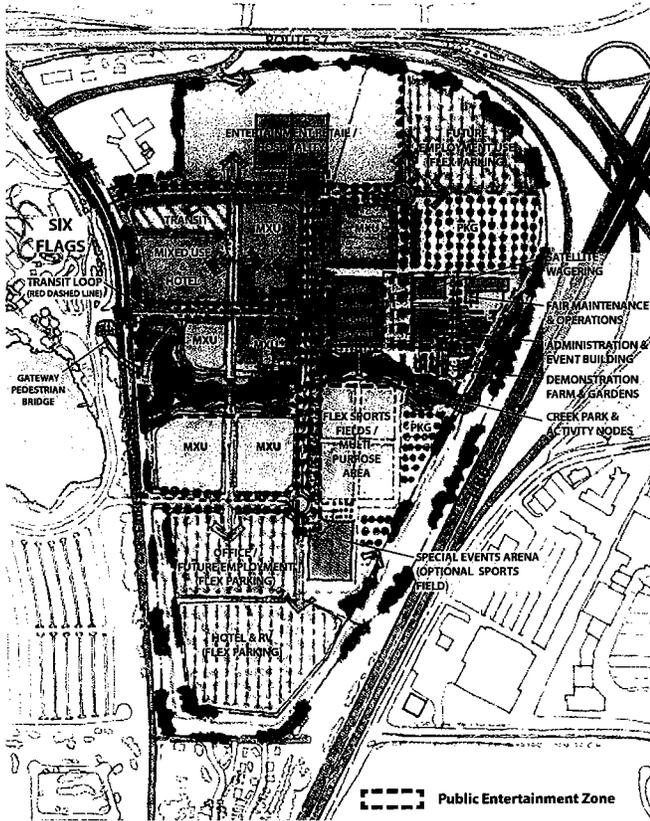
Differences between the Project Vision and Specific Plan

1. In the new plan, commercial/retail space is reduced by more than two-thirds, from about 1.3 million down to 325,000 sqft. There is no major entertainment/retail anchor in the north end, and no hotels or office space. Additions include a 30-acre amusement park and 50 housing units.
2. In the new plan, build-out takes twice as long. The three phases of development are slowed from 15 years to 30 years. Financing is extended to 50 years.
3. In the new plan, the master developer pays much less of the infrastructure costs. Public financing was originally estimated at \$31M total. Although the new plan has far less revenue generating capacity, it assumes \$95M in public financing.
4. In the new plan, Vallejo issues \$24M in municipal bonds for a Community Facilities District (CFD). Original plan: no debt for either Vallejo or its Redevelopment Agency.
5. The original plan envisioned a major commercial/entertainment and shopping destination that would produce \$12M in tax revenue per year at full build-out. The new plan lowers expectations a bit. In the land use description of the Specific Plan, you can read what Vallejo can expect for its \$24M investment:

“Family Entertainment Centers” (FEC’s) as well as associated restaurant and retail activities. Examples of FEC anchor uses within the EMU area include John’s Incredible Pizza, Dave & Buster’s, and other businesses that combine eating, entertainment, small amusement park, gaming, animatronic shows, and similar uses, either within buildings and/or as outdoor venues.

Presumably an animatronic show is something like Chuck E. Cheese.
6. The original plan envisioned synergy with Six Flags. The new plan includes no hotels and a 30-acre amusement park that may compete with Six Flags. (The 30 acres may be reserved for a Six Flags expansion, we don’t know.)
7. The original plan envisioned 50%-90% of tax revenue as a net gain to the county and city. The Fiscal Impact Analysis for the new plan makes no mention at all of net gain. The new plan may syphon revenue that the city and county are already getting.
8. The new plan assumes there will be a master developer for only the family entertainment/mixed use portion of the fairgrounds. County will act as master developer for all other portions.
9. The new plan is heavily weighted toward parking, with almost 30 acres of it, including a multi-level garage at the south end (for Six Flags?). New plan does not explain how free parking for family entertainment/mixed use businesses can co-exist with paid parking for Six Flags and possible new amusement park.
10. The original plan was weighted toward private development. New plan is weighted toward public financing of infrastructure for unnamed and uncertain tenants. New plan assumes Vallejo will recoup its \$24M in bonds through a special tax levied on the 30-acre commercial entertainment business (amusement park). Almost certainly such a tenant would lobby for and receive tax breaks, leaving the debt to the public.

VISION - 2009



PRELIMINARY MIX OF USES <i>Build-out Condition</i>		
Public Land Developed for Private Purposes	Size (Square Feet/Acres)	Totals (Square Feet)
Entertainment Commercial	150,000 sf	
Entertainment/Mixed Use	53,000 sf	
Mixed Use Commercial 1	659,000 sf	
Hospitality 2	250,000 sf	
Office/Flex Parking	220,000 sf	
Open Space/Drainage/Wetlands	19.7 acres	
Subtotal		1,332,000 sf
Public Land Developed for Public Purposes		
Exhibition Hall	100,000 sf	
Other Fair Uses 3	88,000 sf	
Flex Special Events Arena/ Sports Field/Parking	100,000 sf	
Outdoor Multi-Purpose Area	8.0 acres	
Flex Parking	6.6 acres	
Demonstration Farm	3.0 acres	
Open Space/ Drainage/Wetlands	7.1 acres	
Transit/Multi-modal Center	2.5 acres	
Roads	10.7 acres	
Subtotal		288,000 sf
TOTALS 4		1,620,000 sf

Notes

- Mixed Use Commercial assumes approximately 85-90% retail/hospitality and 10-15% office. Before build-out, the mixed-use sites can serve as temporary parking lots for Six Flags and Solano County Fair.
- Early phase assumes interim RV Park on hospitality site.
- Fair Uses include:
 - Satellite Wagering (25,000 sf)
 - Events Building (25,000 sf)
 - Administrative/Conference (8,000 sf)
 - Operations & Maintenance (30,000 sf)
 - Outdoor Multi-Purpose Areas
 - Flex Parking
 - Organic Demonstration Gardens
 - Special Events Arena (optional fields)

See page 41 for more detail on land use program and phasing.

VISION - 2009

Preliminary Project Description and Potential Concept for Phasing

LAND USE	PHASE 1 (SF)	PHASE 2 (SF)	PHASE 3 (SF)	AREA (AC)	FAR	JOBS	PKG (spaces)	Notes (1)
PRIVATE PURPOSES								
Entertainment Commercial	150,000 SF	150,000 SF	150,000 SF	14.2 AC	0.24	150	750	
Entertainment / Mixed Use			53,000 SF	4.8 AC	0.25			
Mixed Use Commercial / Hospitality				22.4 AC	0.55			(2)
Retail (85-90%+/-)		110,000 SF	470,000 SF			940	1,880	
Office (10-15%+/-)		55,000 SF	64,000 SF			256	256	
Hospitality (125 rm)		125,000 SF	125,000 SF	3.0 AC		50	156	
Office / Flex Parking			220,000 SF	16.0 AC	0.32	880	880	(3)
Hospitality (250 Rm)			250,000 SF	10.9 AC		125	313	(4)
Open Space/Drainage/Wetlands				19.7 AC				
<i>Subtotal</i>	150,000 SF	440,000 SF	1,332,000 SF	91.0 AC		2,401	4,235	
PUBLIC PURPOSES								
Exhibition Hall	100,000 SF	100,000 SF	100,000 SF	4.5 AC		5		(5)
Other Fair Uses				11.3 AC		2		
Satellite Wagering (1-2 story)		25,000 SF	25,000 SF			4		(5)
Event Building		25,000 SF	25,000 SF					(5)
Administration / Conference Building (2 story)		8,000 SF	8,000 SF			4		(5)
Maintenance Office, Shops, Warehouse		30,000 SF	30,000 SF			6		(5)
Food and Beverage Facilities								(6)
Outdoor Multi-Purpose Areas/Sports fields		(4 Fields)		8.0 AC				(5)
Flex Parking				6.6 AC			825	
Organic Farm / Demonstration Gardens				3.0 AC				
Open Space/Drainage/Wetlands				7.1 AC				
Events Center/Arena/Sports Field/Flex Parking			100,000 SF	4.4 AC				(7)
Transit/Multi-modal Center				2.5 AC				(8)
Roads (incl. Fairgrounds Dr. widening)				10.7 AC			100	(9)
<i>Subtotal</i>	100,000 SF	188,000 SF	288,000 SF	47.4 AC		21	825	
Public and Private Totals	250,000 SF	628,000 SF	1,620,000 SF	149.1 AC		2,422	5,160	

Notes:

- (1) Building totals are cumulative and include prior phases.
- (2) Mixed Use sites can serve as temporary parking for Six Flags and the Solano County Fair
- (3) Phase 3 shared parking
- (4) Possible Water Park Hotel and Interim RV Park
- (5) Fair Priority
- (6) Included in primary fair buildings
- (7) Numerous future possibilities
- (8) Assumes Shared Parking
- (9) On-street parking - 1 side

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TABLE 2 : ESTIMATED PROJECT REVENUES AT STABLIZATION (YR 15)

#	Revenue Source	Amount
1	Ground Lease Payment from Master Developer	\$709,000
2	Operational Positive Cash Flow From Fair	\$531,000
3	Sales Tax	\$3,637,000
4	Hotel Tax	\$2,246,000
5	Property Tax	\$5,182,000
	TOTAL	\$12,305,000

Of the \$12.3 million estimated project revenue, the pass through agreements require that certain monies go to other entities as follows:

TABLE 3 : ASSOCIATED PASS THROUGH EXPENSES

#	Designated Entity	Amount
1	Redevelopment Agency	\$1,396,000
2	Housing Set Aside	\$1,036,000
3	Schools	\$784,000
4	Greater Vallejo Recreation District	\$179,000
5	Other Agencies	\$250,000
	TOTAL	\$3,645,000

The figures in Table 2 represent annual project revenues. Of the total \$12.3 million, it is assumed in this analysis that \$5.5 million will need to be reinvested in the project for public infrastructure. A portion of the \$5.5 million may come from reinvestment of pass through monies, but that is undetermined at this time. As the project becomes more refined, a project level financing plan can be developed.

Estimated Project Returns

Based on the assumptions made as noted above, the project revenues create a return of more than 7 percent on the County's total investment of approximately \$36 million (includes the \$1.5 million already spent on the Project Vision and \$34.3 million expected to be spent in the future). This is an unleveraged return and does not take into account the benefits of financing. It is

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Estimated Project Costs

For purposes of this financial analysis, project costs were estimated for entitlement, onsite and offsite infrastructure costs and construction costs of the public facilities as detailed in the table below. These costs were the result of sources and assumptions outlined in Section II and further detailed in the exhibits noted in the table below.

TABLE 1 : ESTIMATED FUTURE PROJECT COSTS

#	Expense	Amount	Party Responsible	Note/Source
1	Entitlement Costs*	\$3,000,000	County	Initial Estimate
2	Onsite Infrastructure ¹	\$46,800,000	Master Developer	Mackay/Somps
3	Offsite Infrastructure ²	\$60,100,000	Master Developer	Arup
4	Contribution to Fair Facilities	\$15,000,000	Master Developer	ERA
5	Const. of Other Fair Facilities ³	\$31,300,000	County	ERA
	Total	\$156,200,000		

Notes: * This does not include County costs related to the Visioning Process that have already been spent (approx. 1.5M).
¹ See Exhibit C
² See Exhibit D
³ See Exhibit F

The master developer would be responsible for approximately \$122 million to be funded almost entirely at the beginning of the project. The County would be responsible for a total of approximately \$34.3 million at buildout. Of the \$34.3 million, only the portion related to entitlement would be spent at the onset of the project (approx. \$3 million), and the portion related to the initial vertical construction of the Exposition Hall and multipurpose sports fields would be spent during Phase I (approx. \$11.6 million). The balance would only be spent at such time as additional fair facilities are constructed, which is not anticipated until Phases 2 and 3 of the development. See Exhibit F for a detailed overview of phasing and costs related to Fair facilities.

All other costs of vertical construction (e.g. new building construction, repair, renovation and/or expansion of existing facilities, etc.) for private purposes are assumed to be included in the analysis for each component land use.

Component Land Uses – Private Portion of the 2009 Vision

- **Retail and Restaurant:** The Project Vision contained 523,000 square feet of Restaurant and Retail space. Exhibit G details the assumptions related to this land use for construction costs and projected revenue generation.

- **Open Space:** Six acres for the Creek Park and its water feature that form the spine of the “Public Entertainment Core” connecting the Fair of the Future with mixed use development areas, Entry Road, and Fairgrounds Drive. The water feature provides a visual amenity and water quality feature for onsite stormwater. In addition, the 17.9-acre Fairgrounds Channel alleviates existing flooding problems within the Plan Area and provides opportunities for riparian/wetland habitat and trails.
- **Entertainment-Mixed Use (EMU):** 18.8 acres for entertainment-oriented commercial uses, such as “Family Entertainment Centers”, and associated restaurant and retail activities. EMU parcels are clustered in the northern portion of the site near the Creek Park water feature and Entry Road. Buildings are expected to consist primarily of ground-floor commercial (retail, restaurant, or entertainment) uses with possible incidental office and/or residential space occupying upper stories. Parking is provided within the EMU areas and on major roads. In Phase 3, a parking structure allows intensification of EMU uses from 0.2 to 0.4 FAR.
- **Entertainment Commercial (EC):** 30.0 acres for a major entertainment use that requires a large undivided site. The Plan locates this parcel on the west side of the site, with primary vehicular access from the South Loop Road/Fairgrounds Drive intersection. Entertainment Commercial structures, outdoor rides, and other entertainment attractions are expected to be concentrated in the northern portion of the parcel in order to increase visibility and make best use of the Creek Park amenity. In Phase 2, parking is expected to be located within the southern portion of the parcel. In Phase 3, the EC venues could expand by making use of the shared public parking structure.

NEW

Land Use Program

LAND USES	Acres	Building Square Feet	Housing Units	Parking Stalls
Public Development Areas				
Fairgrounds	35.2	149,500		775
Transit/North Parking Center Bus Docking	1.1			
Transit/North Parking Center Parking Structure	1.1	121,600		380
Shared Public Parking Structure	5.0	800,000		2,500
Shared Public Surface Parking	19.7			1,980
Creek Park (w/water feature)	6.0			
Fairgrounds Channel (peripheral drainage)	17.9			
Major Roads	14.3			73
SUBTOTAL FOR PUBLIC DEVELOPMENT AREAS	100.3	1,071,100		5,708
Entertainment Mixed Use (EMU)	18.8	327,571		804
EMU Parking Structure (included in EMU area)		320,000		1,000
Residential (included in EMU area) ¹			50	
Entertainment Commercial (EC) ²	30.0	n/a		750
SUBTOTAL FOR PRIVATE DEVELOPMENT AREAS	48.8	647,571	50	2,554
TOTALS	149.1	1,718,671.2	50	8,262.0

Table Notes:

1. Housing is allowed within EC or EMU as a Conditional Use Permit from the City of Vallejo (see land use policies).
2. Square foot totals do not include Entertainment Commercial uses, which may include both outdoor venues and buildings. EC parking assumes 750 onsite surface spaces and 1,250 Shared Public Parking spaces at build-out (see parking program).
3. Shared Public Parking serves the Fair and other entertainment venues; includes 19.7 acres of surface parking and a 5-acre (2,500 car) parking structure (see parking program).
4. Square footages include parking structures as noted.

Table 3.1: Land Use Program

LAND USES	Acres	Building Square	Housing	Parking
Public Development Areas				
Fairgrounds	35.2	149,500		775
Transit/North Parking Center Bus Docking	1.1			
Transit/North Parking Center Parking Structure	1.1	121,600		380
Shared Public Parking Structure	5.0	800,000		2,500
Shared Public Surface Parking	19.7			1,980
Creek Park (w/water feature)	6.0			
Fairgrounds Channel (peripheral drainage)	17.9			
Major Roads	14.3			73
SUBTOTAL FOR PUBLIC DEVELOPMENT AREAS	100.3	1,071,100		5,708
Entertainment Mixed Use (EMU)	18.8	327,571		804
EMU Parking Structure (included in EMU area)		320,000		1,000
Residential (included in EMU area) ¹			50	
Entertainment Commercial (EC) ²	30.0	n/a		750
SUBTOTAL FOR PRIVATE DEVELOPMENT AREAS	48.8	647,571	50	2,554
TOTALS	149.1	1,718,671.2	50	8,262.0

Table Notes:

- Housing is allowed within EC or EMU as a Conditional Use Permit from the City of Vallejo (see land use policies).
- Square foot totals do not include Entertainment Commercial uses, which may include both outdoor venues and buildings. EC parking assumes 750 onsite surface spaces and 1,250 Shared Public Parking spaces at build-out (see parking program).
- Shared Public Parking serves the Fair and other entertainment venues; includes 19.7 acres of surface parking and a 5-acre (2,500 car) parking structure (see parking program).
- Square footages include parking structures as noted.

NEW

Table 3.2: Public-Private Acreages

LAND USE	Acres at Buildout	Subtotals
Public Areas		
Fairgrounds (Facilities, Waterway, Parking)	35.2	
Creek Park	6.0	
Open Space/Channel	17.9	
Transit/North Parking Center	2.2	
Shared Public Parking	24.7	
Major Roads	14.3	
<i>Subtotal Public Areas</i>		100.3
Private Development Areas		
Entertainment-Mixed Use (EMU)	18.8	
Entertainment-Commercial (EC)	30.0	
<i>Subtotal Private Areas</i>		48.8
TOTAL	149.1	149.1

**Table ES-2
Proposed Financial Obligations Related to the County, City, and Private Development ¹**

Financial Obligation ¹	Purpose	Timing	Net Amount Funded	Source of Funds
COUNTY ¹				
Certificates of Participation (COPs) – 4 bond issues ²	Fair Exposition Hall; Fair’s Public Infrastructure Obligation	Project Year (PY): 1, 9, 12, & 16	\$64.6 M	Debt service repaid from Fairgrounds, net Project fiscal impact revenue, and ground lease revenue
Capital Appreciation Bonds (CABs) – 3 bond issues ³	Public Infrastructure Oversizing	PY: 1, 4, & 6	\$0	New COPs issuances
COPs – 3 bond issues ²	Retire CABs	PY: 11, 14, & 16	\$12.7 M	Debt service repaid from Fairgrounds, net Project fiscal impact revenue, and ground lease revenue
CITY ¹				
Community Facilities District (CFD) Bonds – 4 bond issues	Public Infrastructure	PY: 6, 19, 22, & 25	\$25.4 M	Debt service repaid from annual special taxes levied on private development
PRIVATE DEVELOPMENT ¹				
Development Impact Fees	Public Infrastructure; Regional Fee Obligation	Building Permit Issuance	---	Not required
Annual CFD Special Taxes per Unit/BSF/Acre/Stall	Public Infrastructure	Annually, beginning PY 6	See CFD above	Building owners / leasehold interests
Excess Annual CFD Special Taxes	Public Infrastructure	Annually, beginning PY 3	\$3.2 M	Building owners / leasehold interests
Developer Equity	Public Infrastructure	As Needed	---	Developers

¹ The PFFP is a planning document that includes a **proposed** financing strategy for the Project. It does not commit the City, County, or Fair to a specific financial obligation. Note that the PFFP does not account for: (i) repayment of the County loan to fund the Specific Plan process; and (ii) City and County General Fund operating revenues and expenses (i.e., net fiscal impacts).

² A total of six COPs issues are anticipated. The last COPs issuance funds (i) Fair costs in Phase 3, (ii) the Fair’s share of infrastructure costs related to the second half of the Exposition Hall, and (iii) the maturity value of the last series of CABs.

³ The net amount funded by CABs equals \$0 because it is considered an interim funding source. All costs funded through CABS are eventually funded by another source of revenue by the time the Project builds out.

The Market for Retail, Office, Hotel and Event Space at the Solano County Fairgrounds

CHAPTER X

THE MARKET FOR EXHIBITION BUILDING/EVENT SPACE

INTRODUCTION

From a customer’s viewpoint, the purpose of an exhibition building and related venues is to provide facilities conducive for large group gatherings. From a community’s perspective, the typical purpose is to attract out-of-town visitors who will spend money in the community on hotels, restaurants, and other goods and services. From a fair’s perspective, the purpose is to have facilities for fair exhibits and activities during the fair and facilities from which to generate net revenue during the periods of the year when the fair is not in session. Financial success depends upon attracting enough out-of-town visitors to generate hotel and sales tax revenue and attracting enough events which pay building space rent, parking, and other fees sufficient to amortize the debt and pay the operating costs of the exhibition building and related venues.

BACKGROUND

Existing Fairground Facilities

Table X-1 below summarizes the existing facilities of the Solano County Fairgrounds.

TABLE X-1	
Existing Fairground Facilities	
	Area # Square Feet
Gibson Hall	13,300
McCormack Hall	22,000
Exposition Hall	23,700
Civic Hall	12,300
Livestock Building	32,400
Sheep Barn	13,300
County Building / Warehouse	17,200
Administration	4,000
Buildings Total	138,400
Shared Plaza	28,000
Paved Venue	45,000
Open Space / Arena	26,000
Carnival / Midway Area	105,000
Lawn Venue Areas	112,500
Concourse / Main Street	83,300
Outdoor Total	399,800
Sources: Solano County Fair website; SWA Group.	



The Market for Retail, Office, Hotel and Event Space at the Solano County Fairgrounds

The Fairgrounds currently includes approximately 138,000 square feet of building space. The Exhibition Hall contains approximately 24,000 square feet of space. Three additional buildings (Gibson Hall, McCormack Hall, and Civic Hall) contain an additional 48,000 square feet of building space. The Livestock Building and Sheep Barn contain about 46,000 square feet of building space. The current Administration Building approximates 4,000 square feet of space.

Outdoor venues and open spaces contain an additional 400,000 square feet of uncovered space (land area).

Fair Attendance Trends

To provide some background for evaluating the demand for exhibition and related venue space, Table X-2 presents estimates of the historical attendance at the Solano County Fair from 2002 through 2010.

TABLE X-2											
Historical Attendance at Annual Solano County Fair: 2002-2010											
	2002	2003	2004	2005	2006	2007	2008	2009	2010	Percent Change 2002-2005-	Percent Change 2006-2010
	#	#	#	#	#	#	#	#	#	%	%
Total Attendance	111,913	94,047	91,880	69,202	80,243	50,078	55,317	49,442	34,748	-38.2	-56.7
Number of Fair Days	10	10	10	10	5	5	5	5	5		
Source: Solano County Fair Association Accounting Records											

Between 2002 and 2005 when the Fair was held over a 10-day period, the Fair attendance declined by 38 percent, from nearly 112,000 attendees to under 70,000 attendees. Between 2006 and 2010 the Fair was shortened to a five-day period, Fair attendance dropped another 57 percent, or to under 35,000.²⁴ Attendance in 2010 is less than half of the attendance level in 2006. The elimination of horse racing at the Fairgrounds in 2009 negatively impacted attendance. A shift in the dates of the Fair session, from the traditional July date to June also negatively impacted attendance because the Fair time overlapped with the fairs held in Alameda County, Petaluma, and Roseville. Attendance from 2009 to 2010 declined by nearly 30 percent from over 49,000 attendees to approximately 34,700 attendees in 2010.

²⁴ The uncertainty related to the future of the Fair may have also contributed to the decline in events and attendance.



The Market for Retail, Office, Hotel and Event Space at the Solano County Fairgrounds

Non-Fair Event Attendance

Table X-3 presents attendance at non-fair events and the number of non-fair events from 2007 to 2011.

TABLE X-3						
Attendance at Non-Fair Events: 2007-2011						
	Actual				Estimated	
	2007 #	2008 #	2009 #	2010 #	2011 #	Percent Change 2007-2011 %
Non-Fair Event Attendance	113,200	138,300	143,900	127,695	132,800	17.3
Number of Non-Fair Events	112	95	78	69	86	-23.2
Source: Solano County Fair Association 2007-2010 STOP – Schedule 5, Accounting Records & Event Calendars						

Attendance at non-Fair events has increased relative to attendance levels in 2007 but has decreased since its peak in 2009, while the number of events have decreased since 2007; although the number of events in 2011 is expected to exceed the number of events held at the site in 2009 and 2010. While non-fair event attendance increased until 2009, the number of non-fair events declined. Non-fair event attendance peaked at 143,900 attendees in 2009 and then declined in 2010. Anticipated attendance in 2011 is expected to increase slightly over 2010 figures to nearly 133,000 attendees. The number of non-fair events has declined from 112 events in 2007 to a low of 69 events in 2010. Similar with the anticipated increase in attendance, the number of events is expected to rise in 2011 to 86 events. Average attendance ranges from 200 to 500 attendees on the low end up to 3,000 to 5,000 attendees on the high end.

Types of Non-Fair Events

Table X-4 describes the number of non-fair events by type of event from 2007 to 2010.



The Market for Retail, Office, Hotel and Event Space at the Solano County Fairgrounds

TABLE X-4

Number of Non-Fair Events by Type of Event at Solano County Fairgrounds: 2007-2010

Type of Event	2007 #	2008 #	2009 #	2010 #	Percent Change 2007- 2010 %
Trade shows	4	3	2	0	-100.0
Consumer Shows	44	16	14	13	-70.5
Sport/Tournaments	15	23	32	28	86.7
Fairs & festivals	1	1	1	1	0.0
Social, military, educational, religious or fraternal (SMERF)	30	41	23	19	-36.7
Other	18	12	7	7	-61.1
Total	113	96	79	70	-38.1

Source: Solano County Fair Association Administrative & Accounting Records

In 2007, nearly two-thirds of the events were made up of consumer shows and social, military, educational, religious or fraternal (“SMERF”) events. With the advent of the Great Recession in 2007, the number of consumer shows experienced a significant decline which has not yet rebounded. SMERF events have also seen a significant drop in the number of events declining by over one-third from the number booked in 2007. **The number of sports and tournament events have steadily increased and by 2010, accounted for about 40 percent of the booked events at the Solano County Fairgrounds.** Trade shows make up very little of the event mix at the Fairgrounds. Average attendance per event held has increased due to a shift in the mix of events, fewer private events, and possibly differences in the way the number of events or event days have been counted over time.

According to information provided by the Solano County Fair Association, the busiest months tend to be from November to April with the number of events beginning to taper off by May. Of the 255 event days anticipated for 2011, 79 percent of them will occur between September and April.

TYPES OF NON-FAIR EVENTS AND POTENTIAL MARKETS SERVED

We understand consistent with the typical purposes outlined above for exhibition buildings and related facilities, the Solano County Fair Association wishes to increase the ability to host a variety of events in order to generate revenue throughout the year. Below, we outline the primary types of non-fair events and identify the types of events or markets potentially served.

Conventions: privately-held meetings of professional groups and associations. The convention industry constitutes a major source of income for destination cities through delegate spending on hotels, restaurants, transportation, and other related industries.



The Market for Retail, Office, Hotel and Event Space at the Solano County Fairgrounds

Trade shows: consist of exhibits designed to present products and services to potential industry customers. Trade shows are sponsored and produced by trade or technical associations or by professional trade show management organizations. Trade shows are frequently accompanied by conventions, meetings, and seminars.

Conventions and trade shows are “blurring”. Convention planners often include display and exhibits of products and processes as part of conventions and trade show producers are using increasing amounts of meeting space to hold in-depth demonstrations and seminars.

Corporate events: major meetings of companies, including for sale and promotion purposes, training seminars, awards and incentives, and stockholders meetings.

Public consumer shows: attract general public and typically charge admission. Examples include boat shows, auto shows, and home and garden shows. Attendees of public shows are usually drawn from the local area. The expenditures made by these attendees, therefore, primarily reflect a redistribution of existing dollars within the local or metropolitan area economy. They typically do not generate significant hotel room-night requirements.

Banquets and receptions: involve some form of food and beverage service and typically require a ballroom or other large space. Attendees are generally drawn from local area. They typically do not generate significant levels of economic impact.

Community events: include public celebrations, public interest seminars, graduations, and many types of not-for-profit functions. These types of events typically do not generate significant levels of economic impact. They do not typically generate significant hotel room-night requirements.

Geographic Scope

A variety of geographical or rotational patterns determine the regions in which an event will rotate, as well as the extent to which a particular location or facility, can compete for events within a market segment. These include the following:

International events: draw attendees from throughout the world and tend to select major, international cities.

National events: draw attendees from all geographical regions within United States. These events, however, are limited to locations with sufficient convention/trade show and hotel facilities to accommodate them, and many rotate their events to differing regions.

Regional events: refers to a convention, trade show, exhibition or meeting held within a specifically defined group of states, usually ones from which the organization draws its membership.



The Market for Retail, Office, Hotel and Event Space at the Solano County Fairgrounds

State events: usually sponsored by a state association or organization. Attendees are drawn from throughout the state.

Local events: usually held by local organizations, associations or corporations. Such events are frequently held within the boundaries of a specific city and are usually for a specific membership or targeted audience.

Based on our interviews and review of prior studies, event organizers consider the bundle of the following factors when choosing a particular destination or facility:

- Exhibition Space;
- Meeting Space;
- Facility Rental Rates and other fees;
- Hotel Room Availability;
- Air and Local Transportation Accessibility; and
- Destination Appeal.

Consideration of potentially competing supply options for attracting the market segments summarized above and interviews with users representing the primary market segments provide a basis on which to assess potential opportunities for facility development and demand acceptance at the site of the Solano County Fairgrounds.

As described below, based on the historical strengths and experience of the Fair, supply competition, and locational characteristics of the Fairgrounds, the interviews (including those with the Solano County Fair Manager and other fair managers) and related research indicate that public or consumer shows, social or SMERF, or other events which require outdoor space are likely to represent primary target “product” markets with the relevant geographic market mainly being local or within the metropolitan area.

INDUSTRY TRENDS FOR EXHIBITION AND MEETING FACILITIES INDICATE INTENSELY COMPETITIVE BROADER MARKET CONDITIONS

In a 2008 article by HVS titled “Convention Centers: Is the Industry Overbuilt”, the authors conclude that the convention center industry has reached maturity resulting in very competitive conditions. New facilities will not simply be able to rely on the “build it they will come approach”.

Between 2000 and 2010, the growth in the supply of exhibition facilities in the U.S. and Canada has increased from 379 facilities to approximately 479 facilities, or a 26 percent



The Market for Retail, Office, Hotel and Event Space at the Solano County Fairgrounds

increase in the number of facilities. With this increase in the number of facilities, the square feet of exhibition space has grown from 65.6 million square feet to 92.1 million square feet, a 27 percent increase in space. This equates to an average facility size of 192,275 square feet of space.²⁵ Convention centers, exposition centers, fairgrounds, and trade centers represent the majority of space.

The demand for exhibit space declined between 2000 and 2004 as measured by the growth in net square feet of exhibit space used by exhibitors. This was primarily due to the rapid growth in the number of new expansions and projects that increased the supply of exhibit space by 15 million square feet. Since 2004, the supply of space has grown by nearly 12 million square feet. Table X-5 shows the historical supply of exhibit space, number of trade and consumer shows, and net square feet of space used.

TABLE X-5

Exhibition Space Trends: 2000-2007¹

	2000	2001	2002	2003	2004	2005	2006	2007	Percent Change 2000-2007 %
Exhibit Space – Sq. Ft. (in Millions)	65.5	67.7	72.4	77.2	80.5	82.3	85.1	85.9	20.4
Number of Trade & Consumer Shows ²	4,637	4,333	4,342	4,578	4,778	4,889	5,000	5,036	8.6
Net Square Feet of Space Used -Sq. Ft. (in Millions)	5,047	5,203	5,125	4,854	4,834	5,012	5,230	NA	3.6 ³
¹ United States and Canada.									
² For shows that used at least 5,000 net square feet of exhibit space.									
³ 2000-2006 period.									
Sources: Convention Centers: Is the Industry Overbuilt, 2008 Update, HVS; Tinley Park Convention Center Market Study, Industry Trend 3-11, May 31, 2007, HVS Convention, Sports & Entertainment; Gruen Gruen + Associates.									

A review of long-term trends (1972-2007) at business-to-business events (i.e., tradeshow) shows that attendance at tradeshow had historically grown at an average rate of 4.4 percent annually; the number of exhibitors increased at an annual rate of 4.5 percent; and the amount of space rented increased at an annual rate of 5.4 percent.²⁶ More recent trends as shown in the table above show a much slower rate of growth generally in the range of 0.5 percent for space used to three percent annual growth in the supply of exhibit space. As a result of these slower growth trends, the supply of exhibit space increased by 20 percent between 2000 and 2007 while the number of shows and amount of space used increased by a much smaller amount of 8.6 percent and 3.6 percent, respectively. In a presentation to the IEDC conference on June 7, 2010 called “New Supply Slows to a Trickle, Analysis of the Convention Center Pipeline” HVS forecasts a very small supply pipeline of new space by historical standards. Approximately 3.9 million square feet of exhibit space is forecast to be added between 2010 and 2014.

²⁵ Based on Tradeshow Week’s database of facilities that exceed 25,000 square feet.

²⁶ HVS International, “Convention Centers: Is the Industry Overbuilt,” 2008 Update.



The Market for Retail, Office, Hotel and Event Space at the Solano County Fairgrounds

The Center for Exhibition Industry Research indicates that the performance for exhibitions related to consumer goods and retail trade sectors is 24 percent lower than the 2000 base index it uses to evaluate market conditions. The overall exhibition industry performance has declined to 2000 levels due to an increase in supply and a decrease in demand over the 10 year period.²⁷

The Center for Exhibition Industry Research's forecast prepared in 2010 indicates that exhibitors in the consumer goods and retail trade sector are likely to remain cautious and not spend as much as in the past on sponsorships or hosted hospitality events and exhibition attendees are not anticipated to generate as much revenue per person as they have historically.²⁸

Interviews with managers of fairs with larger exhibition and event/arena facilities in the Bay Area and Sacramento indicate that their exhibition and event facilities have been impacted by national trends. Major conventions, trade shows, and corporate meetings have been particularly challenging to attract given both the supply additions and reduction in events as firms have cut business travel and event costs. In addition these interviews revealed that video conferencing, Skype, and other communication technology innovations have reduced the need for some types of meetings held in exhibition and event facilities. Cisco, for example, has made some meetings such as its annual sales meeting virtual in 2009 and some meetings as a hybrid between virtual and in-person programs which reduces the number of conference goers²⁹.

In addition, the increase in fuel prices and other economic/income pressures, and time constraints on households has reduced attendance for some public or consumer shows. Multiple fair managers reported significant reductions in attendees for events held annually at their respective facilities.

In the next sections, we shift from consideration of broader national trends impacting the exhibition industry to the micro market conditions that apply, beginning with an identification of the primary area market area Solano County Fairgrounds is likely to serve and sources of competition for potential events that could be held at the Fairgrounds.

SOLANO COUNTY FAIRGROUNDS MARKET AREA AND SUPPLY COMPETITION

Solano County is and is likely to remain the primary market area from which most attendees for both Fair and non-Fair event are drawn. The primary market area, however, is currently somewhat bifurcated by the location of the Dixon May Fair and Cal Expo which attract

²⁷ The Center for Exhibition Industry Research (CEIR) Index, An Analysis of the 2009 Exhibition Industry and Future Outlook, p. 23.

²⁸ Ibid, p. 26.

²⁹ "San Francisco is losing major conventions because Moscone can't accommodate them", San Francisco Business Journal, March 14, 2010.



The Market for Retail, Office, Hotel and Event Space at the Solano County Fairgrounds

visitation from Solano County households located north of Vallejo. The annual Fair competes primarily with the Dixon May Fair for similar attendees.³⁰

A 2009 marketing plan prepared by the Solano County Fair reports the primary market area from which the annual fair draws attendees is Solano County. The marketing plan indicates that the “Fair target audience” is family households (ages 25-54 years) with children with household incomes less than \$100,000. The existing non-Fair events such as Hispanic dance concerts and gun shows attract attendees from the local area not more than approximately a 20 mile radius around the Fairgrounds. An exception is the AKC Dog Show which has the highest attendance of existing non-Fair events at the Fairgrounds and a wider geographic area from which it draws attendees.

The existing and potential future facilities on the site of the Solano County Fairgrounds face significant geographic and product competition. Table X-6 and Map X-1 show examples of the competitive facilities to the Solano County Fairgrounds.

³⁰ As described earlier in the report, however, the Dixon Fair is located in a more rural/suburban eastern part of the county with a greater emphasis on agricultural related activities, while the Solano County Fair is located in a more dense and urbanized western part of the County that trends to draw the majority of its fairgoers from the local community.



The Market for Retail, Office, Hotel and Event Space at the Solano County Fairgrounds

TABLE X-6

Summary of Competitive Facilities for Solano County Fairgrounds in Its Current Condition

ID	Facility Name	Location	Total Exhibit Space (Largest Building) # Square Feet	Total Bldg. Space # Square Feet	Number of Acres #	Parking # Spaces
	Solano County Fairgrounds	Vallejo	40,000 (20,000)	140,250	150	6,580
A	Napa Valley Expo (Town & Country Fairgrounds)	Napa	16,000 (7,200)	31,800	34	780 (est.)
B	CSU East Bay Oakland Center	Oakland	None	11,000		
C	Marin County Fair & Exhibition	San Rafael	22,500 (22,500)	22,500+ ²	14 acre lagoon for fairgrounds	
D	Dixon Fairgrounds	Dixon	10,000 est. (5,000 est.)	26,300	38	
E	Contra Costa County Fairgrounds	Antioch	21,000 (7,000)	21,000		NA
F	Sonoma-Marín Fairgrounds & Event Center	Petaluma	6,358 (6,358)	11,238	60	4,000
G	Alameda County Fairgrounds	Pleasanton	32,500 (32,500)	131,000	267	10,000
H	Napa County Fairgrounds	Calistoga	15,100 (9,400)	15,100	60	
I	Sonoma County Fairgrounds	Santa Rosa	105,838 (40,500)	105,838		9,000
J	San Mateo County Event Center	San Mateo	215,000 (104,900)	254,500		4,000

¹ Interviews with the Solano County Fair Manager and an official with the Vallejo Convention and Visitors Bureau also indicate Dan Foley Park (GVRD), Antique Car Museum, USA Classic World Event Center and other smaller facilities are available locally for social, community, and other smaller events.

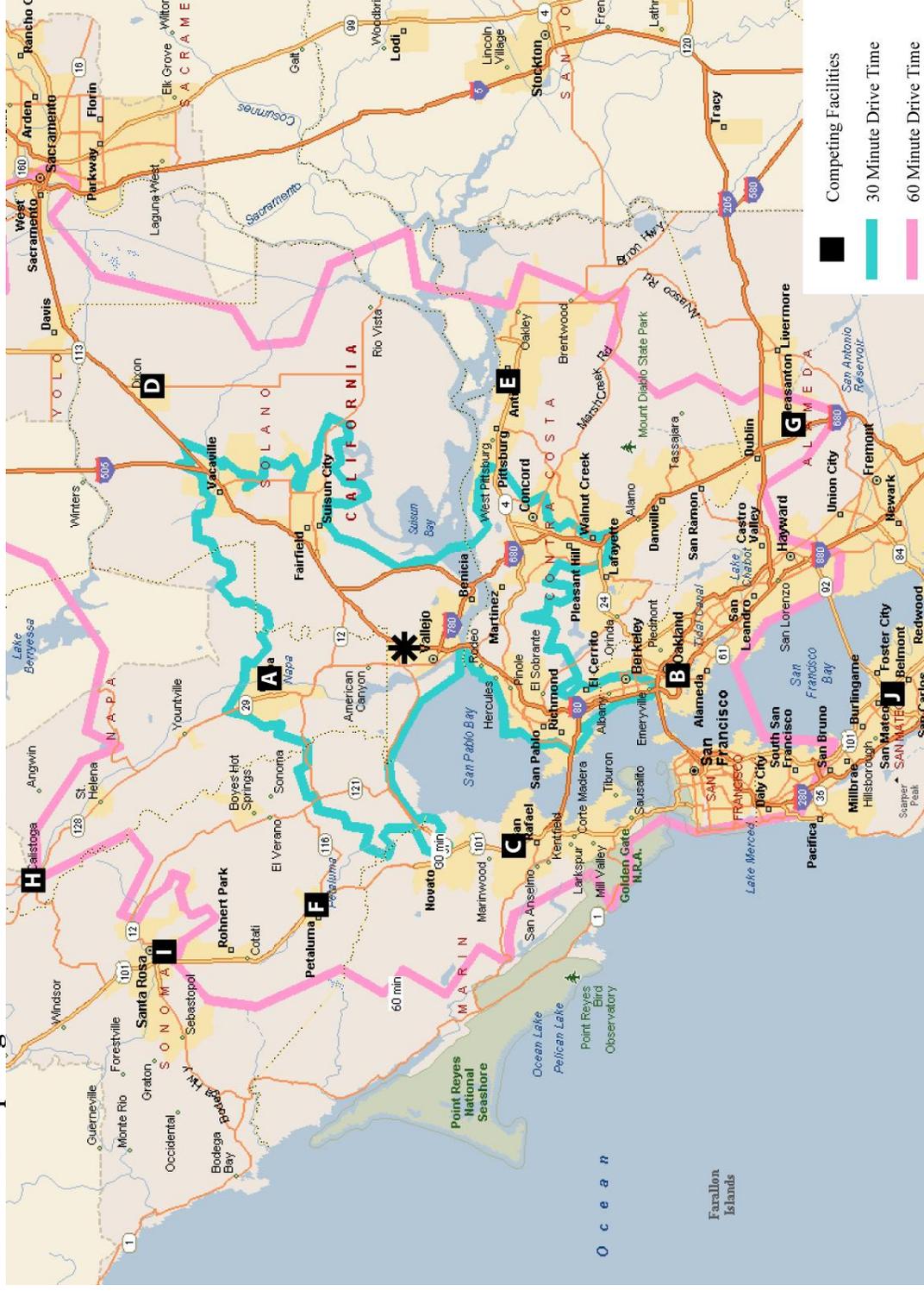
²In addition to the exhibition hall (Marin Event Center), meeting space, the Veteran’s Memorial Auditorium and Showcase Theatre are available.

Source: Solano County Fair Manager; Websites of facilities; Gruen Gruen + Associates.



The Market for Retail, Office, Hotel and Event Space at the Solano County Fairgrounds

MAP X-1: Competing Exhibition Facilities



The Market for Retail, Office, Hotel and Event Space at the Solano County Fairgrounds

Nine competitive facilities of which eight are fairgrounds are located within a 60-minute drive of the Solano County Fairgrounds. One additional fairgrounds event facility, San Mateo County Event Center, is located beyond a 60-minute drive time of the Fairgrounds. The interviews and review of attendance and event data indicate the two largest fairground facilities, Sonoma County and Alameda County, represent the most competitive fairground facilities in the broader region. Alameda County Fairgrounds which had annual attendance of over 418,000 at its 2010 annual fair has over 4,000 hotel rooms nearby. Sonoma County Fairgrounds has an annual fair attendance of over 300,000. These two fairgrounds, one north and one south of Solano County Fairgrounds, are each located about an hour from Solano County Fairgrounds. This is likely to constrain the trade area from which attendees can be drawn to Solano County Fairgrounds' events to up to an approximately 30-minute drive time around the site.

Table X-7 presents existing facilities that have large exhibit facilities and are expected to represent competition to Solano County Fairgrounds should it build a 100,000-square-foot exhibition hall and 25,000-square-foot events building. According to a report prepared by ERA/AECOM for the California Exposition and State Fair, over three million square feet of competitive public exhibit space is available in northern California and Reno Nevada.³¹

³¹ "Fairgrounds Market Demand Evaluation with Arena and Redevelopment Program at Cal Expo, Prepared for National Basketball Association and California Exposition & State Fair", Submitted by Economics Research Associates, an AECOM Company, February 2009, p. 59.



The Market for Retail, Office, Hotel and Event Space at the Solano County Fairgrounds

TABLE X-7

**Summary of Competitive Facilities for Solano County Fairgrounds
in Its Proposed Future Condition with 100,000-Square-Foot
Exhibition Building and Events Building**

Facility Name	Location	Total Exhibit Space/ Largest Building # Square Feet	Total Space # Square Feet	Parking # Spaces
Moscone Center	San Francisco	541,900	798,100	3,000 (nearby)
Cow Palace	Daly City	300,000	306,900	4,200
Cal Expo	Sacramento	300,000 98,000	300,000	17,000
San Mateo County Event Center	Santa Rosa	215,000 104,900	254,500	4,000
San Jose McEnery Convention Center	San Jose	143,000	194,900	700 on-site
Sacramento Convention Center	Sacramento	134,000	186,700	2,000 (nearby)
Santa Clara Convention Center	Santa Clara	90,014 43,653	302,000	
Oakland Convention Center	Oakland	48,000	64,000	Next to Marriott Center which has 25,000 of additional event space.
Craneway Pavilion	Richmond	45,000 s.f. pavilion	Seats 1,932-2,056	NA
Sources: <i>Fairgrounds Market Demand Evaluation with Arena and Redevelopment Program</i> , Prepared for National Basketball Association and California Exposition and State Fair by Economics Research Associates, July 2009; Convention Center websites; Interviews with Facilities Managers; Gruen Gruen + Associates.				

The largest convention facility in the region is Moscone Center, San Francisco’s major convention center. With nearly 800,000 square feet of total space, the convention center is used for national and international conventions and trade shows. Moscone Center competes with other major convention markets in the U.S for conventions, trade shows, and corporate meetings. The Cow Palace is the second largest facility in the Bay Area with about 300,000 square feet of space. It is a multi-purpose venue with exhibit halls that are basic buildings of 49,000 square feet each and two other exhibit buildings which can be divided into three spaces of 20,000 square feet each.³²

Cal Expo, the State Fairgrounds in Sacramento, contains over 300,000 square feet of exhibit space and is the dominant consumer show venue in the Sacramento area. The Pavilions building, the largest exhibit facility is approximately 100,000 square feet. Two other exhibit buildings are 20,000 square feet and 28,000 square feet in size. At 20 years old, the Pavilions building is not air conditioned which limits its use during warm weather months. Between 2004 and 2007, Cal Expo hosted an average of 100 non-fair events with an average of 550

³² “Fairgrounds Market Demand Evaluation with Arena and Redevelopment Program at Cal Expo, Prepared for National Basketball Association and California Exposition & State Fair”, Submitted by Economics Research Associates, an AECOM Company, February 2009, p. 59.



The Market for Retail, Office, Hotel and Event Space at the Solano County Fairgrounds

annual event days (including move-in/move-out days).³³ Typical of many fairgrounds, over 40 percent of the non-fair events at Cal Expo were consumer or public show events. Another 22 percent of events are SMERF. Only two percent of Cal Expo's non-fair events are trade shows. Because Cal Expo hosts a large share of the public shows in Sacramento, the average amount of indoor space utilized is 138,700 square feet and the average amount of outdoor space utilized for public shows is 324,000 square feet (both tented and paved space)³⁴. For the larger public shows, the utilization rate of Cal Expo's three exhibit halls are 20 percent to 21 percent³⁵. The trade area from which Cal Expo can draw visitors is up to 60 minutes away which would include the City of Fairfield³⁶. This large trade area will limit Solano County Fairgrounds pulling visitors from further north than Fairfield because Cal Expo will compete for the same kinds of shows that could potentially be attracted to the Solano County Fairgrounds.

The Sacramento Convention Center hosts over 500 events annually. The convention center has a 134,000-square-foot exhibit hall which is divisible into five areas. The exhibit hall hosts large trade and association meetings and consumer shows like the California State Home & Garden Show and Easy Rider Bike Show. A larger proportion (55 percent) of the exhibit hall events are conventions and conferences and smaller proportion (21 percent) are consumer shows³⁷. Due to the type of shows the Sacramento Convention Center hosts, demand is greatest for the exhibit halls that range in size from 12,300 to 33,000 square feet with a reported 75 percent utilization rate³⁸. The higher utilization rate than reported for Cal Expo relates to the convention center serving more frequent weekday convention and conference shows. Facilities cannot be feasibly designed to serve all types of events and must be specialized to accommodate the needs of specific types of events.

The San Jose Convention Center trade show calendar from January 2011 to January 2012 lists 102 booked events. Attendance at these events is estimated to range from 500 to 1,000 for conferences and meetings to as high as 15,000 for Hispanic dance and music events. The majority of events (over 50 percent) are in the range of 1,000 to 3,000 attendees.

The San Mateo County Event Center contains nearly 105,000 square feet of exhibit space. According to a listing on the National Association of Consumer Shows website, the facility is advertising open dates for its facilities for two open weekends in July 2011, one week in August 2011, and one week in January 2012. A recent San Mateo Daily Journal article reports the San Mateo County Event Center is adding an event called First Fridays Movable Feast to its event programming to book Friday nights. The manager indicated that while weekends were booked up completely going into 2013, the weekdays were often open during the year³⁹.

³³ Ibid, p. 25.

³⁴ Ibid, p. 32.

³⁵ Ibid, p. 30.

³⁶ Ibid, p. 48.

³⁷ Ibid, p. 70.

³⁸ Ibid, p. 71.

³⁹ "Event Center expands menu", San Mateo Daily Journal, May 21, 2011.



The Market for Retail, Office, Hotel and Event Space at the Solano County Fairgrounds

Some of the facilities have recently or are planning an expansion. A HVS lodging market update for January 2011 reports the San Francisco Economic Development Department has reviewed plans to expand Moscone Center by 25 percent so it can better compete for tradeshow business with Chicago and Las Vegas but that any plans are preliminary and on hold given the fragile economic recovery⁴⁰. Santa Clara Convention Center expanded to 90,000 square feet of exhibit space and 70,910 square feet of meeting space in 2009. San Jose McEnery Convention Center is planning a \$120 million expansion and renovation that will add 125,000 square feet of new space including 25,000 square feet of meeting space and 35,000 square feet of ballroom space when it is completed which is anticipated to be in 2013⁴¹.

In addition to the supply of exhibition and convention facilities, larger San Francisco hotels such as the San Francisco Hilton which historically have not significantly competed for exhibitions and public/consumer shows with fair facilities such as the Cal Expo in Sacramento have begun to compete for such events due to the downturn in the corporate meeting and business-to-business trade shows attributable to the Great Recession. Accordingly, these hotels represent sources of potential competition which may siphon off some potential demand for events at the proposed exhibition building.

Conclusions Drawn From Review of Supply

The review of the supply of convention, exhibition, trade show, and public show facilities suggest the following conclusions:

- Existing convention, exhibition and event facilities in the San Francisco Bay Area (especially San Francisco and Silicon Valley) and Sacramento have ample facility and hotel room capacity to serve a wide variety of events, including large conventions, trade shows and corporate meetings as well as public consumer shows;
- A wide variety of facilities, including the existing Solano County Fairgrounds and other county fairs and hotels have the capacity to serve smaller events, including local public or consumer shows and those events which require both interior building space and outdoor space. Competition for serving demands originating from corporate events such as meetings, seminars, product launches, exhibitions and smaller convention and trade show events is intense. The interviews suggest an increasing proportion of demand from smaller events can be expected to be absorbed in hotel facilities, which have incentives to offer conference and meeting space at highly attractive rates in order to obtain hotel room bookings; and
- Alameda County and Contra Costa County to the south, Sonoma County to the west, and Sacramento to the east of the Solano County Fairgrounds have venues to also serve the demands of medium-sized events and will constrain the trade area from which the Solano County Fairgrounds can draw attendees and attract events.

⁴⁰ “San Francisco Market Update – Recovering from Recent Economic Recession”, p. 5, HVS, January 2011.

⁴¹ “San Jose Project Advances Amid Doubts”, The Wall Street Journal, April 7, 2011.



The Market for Retail, Office, Hotel and Event Space at the Solano County Fairgrounds

DEMOGRAPHIC AND EMPLOYMENT ANALYSIS TO COMPARE PRIMARY MARKET AREA FOR EVENTS AT PROPOSED EXHIBITION BUILDING AND EVENTS CENTER AT THE SOLANO COUNTY FAIRGROUNDS TO CHARACTERISTICS OF OTHER VENUES WITH SIMILAR FACILITIES

The interviews confirm the ability of the Solano County Fairgrounds to draw events sufficient to support the size of the proposed exhibition building and related facilities will significantly depend upon the size of the market area population and employment and its income and spending characteristics. In order to assess the depth of potential primary market area demand for a new 100,000-square-foot exhibition building at the site of the Solano County Fairgrounds relative to the market characteristics of other venues with large exhibition buildings, we compare the Solano County Fairgrounds site to the potentially competing facilities cited above in Table X-8 in terms of market area population and socioeconomic characteristics and employment base.

TABLE X-8

Demographic, Socioeconomic, and Employment Characteristics of San Francisco Bay Area and Sacramento Venues with Large Exhibition Buildings and Event Centers Like Those Proposed for the Solano County Fairgrounds

	Moscone Center	Cow Palace & San Mateo County Event Center	Cal Expo	Oakland Convention Center	Craneway Pavilion	Santa Clara Convention Center & San Jose Convention Center	Solano County Fairgrounds
County	San Francisco	San Mateo	Sacramento	Alameda	Contra Costa	Santa Clara	Solano
Population	812,820	724,702	1,428,355	1,521,157	1,056,064	1,737,375	414,509
Households	346,491	258,214	514,913	546,390	376,435	605,274	141,856
Total Employment ¹	933,800	933,800	794,200	938,300	938,300	862,900	116,800
Average Household Income	\$102,683	\$117,895	\$68,594	\$89,361	\$100,059	\$109,569	\$79,866
Percent of Households with Income Above \$100,000	35.3	43.1	20.8	33.3	36.6	42.7	27.4

¹ Non-farm, March 2011.

Sources: California Department of Finance, Table E-5 State/Counties Population & Housing Estimates, January 1, 2011; California Employment Development Department, Local Area Profile; U.S. Census Bureau, 2009 American Community Survey; Gruen Gruen + Associates.

The eight larger facilities for which the Solano County Fairgrounds is compared against are located in counties that have populations nearly two times to more than four times larger than Solano County’s population base. Similarly, the household base of Solano County is



The Market for Retail, Office, Hotel and Event Space at the Solano County Fairgrounds

the smallest of the counties compared with the closest San Mateo County being about 180 percent larger in terms of number of households. Because Solano County includes bedroom communities with a large percentage of its residents commuting out of the County, the ratio of Solano County's employment base to the other counties' bases is even more skewed. All the other counties have employment bases from which to draw businesses that may need exhibit and event facilities six times to eight times larger than Solano County's base.

Just as conference, corporate and business-to-business trade show events seek locations with dense employment and business bases including their members or characteristics of their target customers, public or consumer shows prefer locations that include households possessing the characteristics of consumers which purchase their offerings. The interviews, for example, indicate that golf-related show promoters prefer event locations with a high number of golf courses and affluent households, while home and garden shows prefer locations proximate to new housing development and communities whose residents are likely to have relatively greater disposable incomes and are in life-stages in which they are furnishing and decorating homes. All of the areas other than Sacramento have substantially higher proportions of their populations with incomes above \$100,000 than Solano County. This indication of spending power suggests other submarkets have a higher proportion as well as numbers of residents with more disposable income to spend at public or consumer shows than do residents of Solano County.

Based on the findings about broader industry trends, the likely primary market area facilities at the Solano County Fairgrounds will most likely serve, the locations, types, and sizes of potentially competing venues, and comparison of demographic, income and employment characteristics, *it is unlikely that convention, trade shows and corporate meetings and other events during the work week will comprise a large source of use and net revenue for the proposed exhibition and event facilities.*

In addition, the interviews with fair managers indicate that it is typically difficult for fairgrounds with facilities (featuring multi-purpose flat floor space) that also need to serve the requirements of fairs to compete with non-fair facilities that offer higher-quality finishes and more breakout meeting room and conference space that convention and corporate meeting users require. For larger fairs in particular, the preparation and tear down time related to fair exhibits can also limit the ability to serve the business or corporate related markets before, after, and during the fair.

Moreover, interviews with fair managers familiar with event centers and arenas described a shift that has occurred in the music or concert industry. Nationally recognized performers are now able to command significant shares of ticket revenue and therefore concert promoters must seek and rely on obtaining revenues that the performers cannot readily access such as amounts that the events centers or arenas would otherwise receive as rent, food and beverage concession revenues and parking fees. This shift explains why promoters such as Live Nation have begun to build their own facilities in order to control the revenue sources that in the past event centers and arenas were able to obtain. Local and regional ethnic-oriented performances that can be held in exhibition facilities are likely to be a more



The Market for Retail, Office, Hotel and Event Space at the Solano County Fairgrounds

profitable market and one that the Solano County Fairgrounds can penetrate further with facility improvements and targeted marketing.

POTENTIAL EVENTS ANALYSIS

Accordingly to obtain more insight about the nature of potential demand for exhibition events in the proposed facilities, we conducted interviews with the event promoters listed in Table X-9 below which do not currently hold events at the Solano County Fairgrounds.

TABLE X-9

Summary of Potential Public and Consumer Shows Contacted

Type of Show	Doll Show	Gem/ Jewelry Show	Arts & Crafts Show	Maker (DIY) Show
Number of Annual Shows	17	30	4 (in northern California); others in Nevada and southern California	3
Size of Attendance/Exhibitors	250 attendees; 10-15 exhibitor	2,500 (est.)	11,000-17,000 attendees/200-300 exhibitors	100,000 attendees, 500 exhibitors
Amount of Space Used (in Square Feet)	4,000-5,000	20,000-25,000	48,500 + outdoor space	300,000
Current Locations/Exhibit Venues	Pleasanton	San Rafael, Pleasanton, Sacramento, Santa Rosa	Pleasanton, Sacramento, San Jose, San Mateo	San Mateo, New York, Detroit
Market Area from Which Attendees are Drawn	150-250 Miles	20 miles	2 hour drive time	San Francisco, East Bay, San Mateo/Silicon Valley region
Potential Interest in new facility at Solano County Fairgrounds	No, happy with current venue	No, does not want to add new shows	No, does not want to add new shows	No, needs facility that can provide parking for 30,000+ cars; has access from more than two highways; at least five full-service hotels in vicinity; and police and fire services.

Source: Calls to promoters/producers by Gruen Gruen + Associates

Demographic Make-up of Attendees

The arts and crafts show reports that the average income of shoppers is over \$85,000 and 87 percent of attendees are women ages 35-64 years. The gem/jewelry show producer reported



The Market for Retail, Office, Hotel and Event Space at the Solano County Fairgrounds

that the attendees were primarily females with incomes above \$60,000. A travel, fishing, hunting, and outdoor sports show that exhibits in Sacramento (as well as Salt Lake City, Denver, and Phoenix) reports attendance for its four-day shows of 22,000 to 40,000 people. Attendees are 76 percent male with over one-quarter of attendees having household incomes above \$100,000 and 75 percent of attendees are home owners. The Maker DIY show representative indicated attendees' household incomes average over \$125,000 with 60 percent of attendees having attained college degrees. The interviews indicate that event producers and planners evaluate the demographic, income and educational and other characteristics of the population of the geographic areas in which venues are located to select venues in market areas that fit with the make-up of attendees of their events.

Number and Size of Shows and Amount of Building Space Utilized

The annual number produced by the promoters range from four in Northern California (and additional shows elsewhere) for the arts and crafts show to 30 for the gem/jewelry show. Attendance ranges from 250 attendees for the doll show which uses 4,000 square feet of space to approximately 2,500 attendees for the gem/jewelry show which uses 20,000 to 25,000 square feet of space to 11,000 to 17,000 attendees for the arts and crafts show which utilizes 48,500 square feet of building space plus outdoor space. The largest show, the DIY show, attracts attendance of 100,000 and uses over 300,000 square feet of both indoor and outdoor space. This show producer brings in its own structures to supplement the San Mateo County Event Center existing facilities.

Venue Locations and Geographic Areas From Which Attendees are Attracted

The shows currently hold events at the Alameda County Fairgrounds in Pleasanton, Marin Center in San Rafael, the Sonoma County Fairgrounds in Santa Rosa, Cal Expo in Sacramento, San Jose Convention Center, and the San Mateo County Event Center. The smallest and specialized event, the doll show reports attracting attendees from as far as 150 to 200 miles away. The gem and jewelry show which puts on 30 annual events has the smallest trade area of approximately 20 miles. The arts and craft show reports a draw area of up to two hours. The largest event, the Maker DIY attracts most of its attendees from Silicon Valley, San Francisco, and the East Bay. Access via multiple highways, availability of hotels and support services, and large amounts of parking (4,000 spaces available at the San Mateo facility are insufficient) are critical requirements.

Potential Interest in Holding Events at Solano County Fairgrounds

One user, the doll show, is satisfied with the current venue and would not consider moving the show to the Solano County Fairgrounds. The two other users are also satisfied with the current venues and do not currently plan to add shows at new venue locations. The largest show, the DIY show, would need large amounts of space and parking and also does only three annual shows nationwide (one other is at the New York Hall of Science and the other is at the Henry Ford Museum in Dearborn, Michigan). Interviews with both managers of event facilities and promoters suggests that many event promoters will "stick with tried and



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true” facilities and that existing venues will lower prices and offer attractive combinations of services to preempt new facilities from inducing events to move from existing facilities to the new facilities.

Conclusions About Demand Potential Drawn From Interviews of Potential Users/Events and Synthesis of Research

The facility programming and sizing should reflect the findings from the research that most events the Fair will most likely capture will tend to occur on the weekend dates (Friday-Sunday); and most events will be public or consumer shows, SMERF and community events.

Review of the prior ERA/AECom report⁴², review of financial statements for exhibition facilities and interviews with multiple fair managers of large exhibition and event facilities confirm that the capital costs of the proposed exhibition and event facilities will need to be subsidized and that even successful operations will probably need to be subsidized.

⁴² Previous findings by ERA indicate that the proposed capital facilities would require a large subsidy to develop and ERA appears to have projected that operating expenses would exceed the revenues generated from the operation of the exhibition/event facilities. See ‘Solano360 Vision Plan Financial modeling and Fiscal Analysis,’ Exhibit K, prepared by Economics Research Associates dated January 14, 2010.



**Proposal for a
Youth and Amateur Sports Complex
at the Solano County Fairgrounds**

This proposal makes an *economic* argument for re-developing the Solano County Fairgrounds as a youth and amateur sports complex. There are probably many arguments that can be made for this kind of re-development project, including improved quality of life, healthier kids, and a safer and cleaner environment. I do not mean to diminish such things. I just want to concentrate on the issues which seem most likely to sway city and county officials: jobs, growth and taxes.

I have obtained some hard numbers about the economic impact of youth sports in general and sports complexes in particular. These are not necessarily pertinent to Vallejo, since it's not the kind of suburban community where such complexes typically have been built. On the other hand, if the numbers are off, I suspect it will be on the low-end. Vallejo could see a greater economic benefit for many reasons:

- Location. Vallejo is an ideal place for a sports complex. It is in the middle of a population base that extends from Sacramento to San Francisco and from Santa Rosa to Monterey. It is reasonably served by 3 airports. The many tourist attractions nearby would put Vallejo/Solano at or near the top of every national and regional tournament list.
- Excellent weather. It is suitable for outdoor play approximately 10 months of the year.
- Plenty of land is available for a combined indoor/outdoor sports complex and events center.
- Proximity to Six Flags. A synergy exists because youth sports and Six Flags attract a similar demographic: 6- to 19-year-olds.
- There is no significant competition on the west coast, at least none that I've been able to discern. The value of land in major metro areas largely precludes a similar-size, competing facility from being built in the future.
- Possibility of naming rights, due to the fairgrounds location by I-80.

Before delving into the numbers, I should provide a little background. One of the early clues that a sports complex may be a good idea for Vallejo came from a travel package that I saw for Disney's Wide World of Sports in Florida. I have included some pictures of this amazing facility, soon to be re-branded the ESPN Sports Complex, on the following pages. A second clue came from a newspaper report about New Orleans' re-development efforts since Hurricane Katrina. The city is considering a sports complex as a way to revive its tourist industry. The complex would be built in, of all places, a closed Six Flags amusement park; officials have looked at Disney's Wide World of Sports as a model.



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- Tennis Complex
- Track & Field Complex



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Learn More About Our Complex



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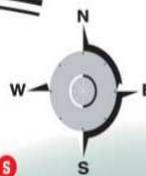
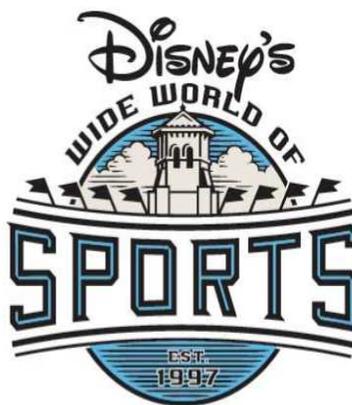


Softball Diamondplex

The Diamondplex features four fields in a giant circular pattern with two additional fields adjacent. Outfield fences measure 305 feet, and temporary fences are available for games when shorter distances are required. Each field can be configured to accommodate fastpitch softball, slowpitch softball, or youth baseball games, and all the fields feature bullpens and spacious dugouts. A centrally located tower overlooking the venue offers conveniences including press facilities, concession stands, and an area for scorekeepers and officials.

Learn More About Our Complex

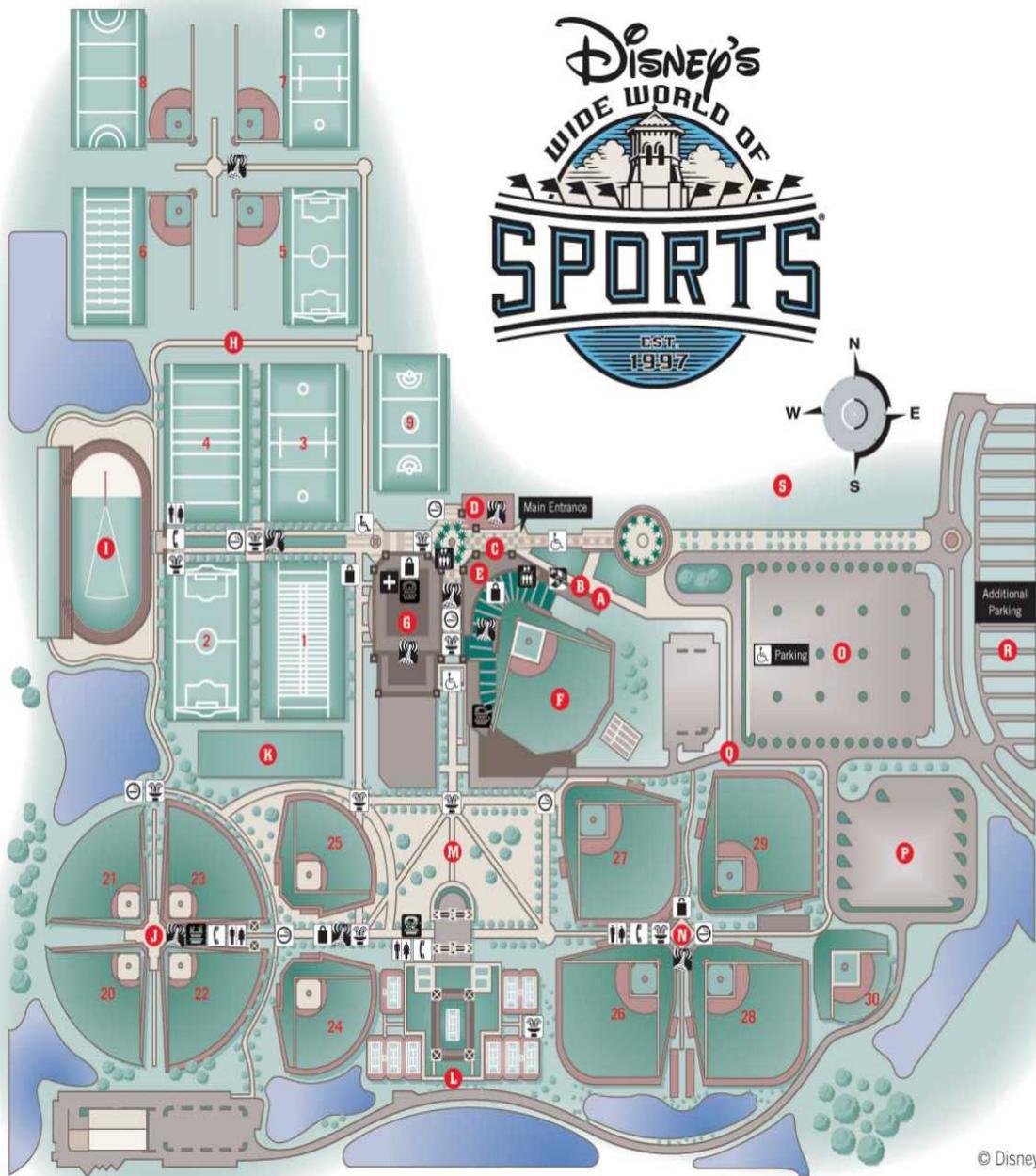




Map Legend

- A** Box Office
- B** D Sports Merchandise Shop
- C** Guest Services & Sports Information
- D** Official All Star Cafe®
- E** Disney's Clubhouse Merchandise Shop
- F** The Ballpark
- G** The Milk House
- H** HESS® Sports Fields
- I** Track & Field Complex
- J** Diamondplex
- K** The Sports Experience
- L** Tennis Complex
- M** Town Green, Presented by Toro®
- N** Baseball Quadraplex
- O** Parking—Main
- P** Bus/RV Parking
- Q** Secondary Entrance
- R** Parking—Touchdown
- S** Parking—Slam Dunk

- ATM Location
- Elevator
- First Aid (during event hours)
- Smoking Area
- Restroom
- Merchandise
- Pay Phone Equipped w/TTY
- Pay Phone
- Water Fountain
- Wi-Fi Zone



Vallejo and Solano County might also take a page from Disney's playbook. It is easy to imagine the buildings and fields, or any number of similar facilities, on the fairgrounds property. Land-use would be only incrementally different from what is there now: racetrack, golf course, grass fields, public walkways and exhibition halls. With parking that is adequate in its present form (paving is not required), Six Flags across the street, and re-development that is almost by definition "green", the fairgrounds can stay largely in its present form and do year-round, double-duty as a sports and events complex. Whatever changeover is necessary can be done in stages and at low cost, producing near- and long-term economic benefit to the community.

Let us turn our attention now to the economic benefit, for that is central to the argument I am making here. I need to start with some guiding principles about the nature and size of a sports complex and about tourism:

- (1) There are companies which can be brought in to finance a sports complex, as long as it is considered "world class", not a small local project. I came across several such companies on the internet. They have been involved with similar projects around the country and are looking for opportunities, just like housing, retail and commercial developers want to get in on the present Brooks Street plan. *A sports complex can be built without the city or county funding it.*

Important: No one should confuse what I'm describing here with a professional sports arena or stadium; those typically cost taxpayers money and they would not be an appropriate use for the fairgrounds.

- (2) The idea that a sports complex can generate revenue comes from real-life examples, not just research reports. The biggest hurdle may be public perception. People think of such things as an expense. They are not—IF they are large enough. With somewhere around 12 or 15 soccer fields, a complex can host state, regional and national tournaments. These bring in major tourist dollars. Same with a 4- or 6-field baseball park. Same with 8 to 10 indoor volleyball or basketball courts. The fairgrounds could be home to all three such facilities, and more.
- (3) The key to revenue generation is to get beyond one-day events. Then you get hotel and restaurant taxes, plus many direct benefits to local business. Overnight tournaments have grown in popularity as travel has gotten easier and middle class parents have sought out "the best" experiences for their kids. Disney knows this, and the company's logic is easy to follow. Remember, by the second or third day of a tournament, there are losing teams—most of the teams, actually—which have stayed overnight and now have nothing to do. Want to draw a bigger crowd at Six Flags or get enough kids to the Iowa battleship, if it is docked at Mare Island? Host 2- and 3-day tournaments!

By the way, Benicia's community park and other sports facilities in Solano County do not undermine the argument about economic benefit. They do not have enough fields to attract teams beyond about a 60 mile or one-hour radius for tournaments. Thus, they are an expense. Same with essentially every facility in the Bay Area and Northern California, with a few exceptions: soccer and baseball complexes near Redding, Modesto, and Morgan Hill. These generate some revenue for the cities, but they are on a different scale than what I am suggesting. They are not convenient or large enough to draw teams beyond Northern California.

- (4) Because of its location and size (155 acres), a sports complex at the fairgrounds would be without rival in the western United States. Soccer would need 50 or 60 acres. Baseball/softball only about 10 acres. Add another 20 acres for indoor facilities, and you still have 60+ acres for restaurants, retail, offices, parking, and, in fact, many of the architectural/urban design elements proposed by Brooks Street. My personal preference would be to tie all this together with fairgrounds facilities and permanent exhibits, including the housing of local clubs (rocks and gems, 4-H, etc.), plus arts and cultural groups, and perhaps something like a nature center. All of this could be supported by facility fees, including amateur adult sports leagues, which are proliferating, always short of playing space, and willing to pay.

Please note that “sports complex” is a broad term. It is really a sports and *events* center that I am proposing for the fairgrounds. There is no reason that indoor facilities can’t do double-duty as exhibit halls and entertainment venues. In all cases, the goal should be to attract people to Vallejo—and get them to stay overnight. If this can be done by hosting a cheer competition, that’s just as good a use of the facilities as a basketball or volleyball tournament.

- (5) Tourist dollars are the absolutely best economic benefit to a community. Simply put, they keep a development project from being a zero-sum game. What Brooks Street has proposed for the fairgrounds, aside from all environmental and quality-of-life issues, detracts from other economic development projects in Vallejo and Solano County. It’s very hard to imagine any net gain. Office space competes against development in Cordelia Junction, just 10 minutes away. Retail competes with Westfield Mall in Fairfield, not to mention the malls right across the highway in Vallejo. Light industrial, such as biotech, competes with Vacaville developments and the Cancer/Research Center that was proposed for Mare Island. Big box stores *might* keep people from shopping in Concord, but nobody wants them built. Medium-sized retail only hurts redevelopment efforts around Vallejo—more blight like the empty Kmart lot on Solano Blvd or the moribund Longs strip mall across the street. Small retail, restaurants and boutiques will devastate old town Vallejo and set back any waterfront development. We can avoid all these negatives by bringing in tourists. The city shouldn’t just be the gateway to everything; it should be a major destination in its own right. In short, we should be true visionaries. We should be doing something that puts Vallejo/Solano County on national and world maps!

Now for the numbers. I have pulled these together from various newspaper articles and websites. I will present them in a way that progresses from the general topic, “youth and amateur sports as a business”, to specific examples of sport complexes.

- (1) When talking about sports as a business, Disney’s Wide World of Sports is a good place to start. At it happens, the company announced a major expansion of this property just six months ago. On the part of its website directed toward investors, Disney makes its reasons plain: youth sports is a fast-growing industry with overall economic impact in the U.S. of \$6.1 billion last year; and the sports complex is a profit-generator, especially with its ties to Disney World, Disney hotel properties, etc.

Here are more numbers from **wdwpublicaffairs.com**:

Each year, the Disney sports complex stages more than 180 events. Since its inception, the complex has hosted athletes from more than 70 countries involved in more than 50 different sports. “A majority of the athletes and spectators who compete in a Disney sports event are first-time visitors to Disney,” said Ken Potrock, senior VP of Disney Sports Enterprises. “In fact, roughly 85 percent of these guests would not have come to Disney if it weren’t for an event at our sports complex, and many of them...are repeat visitors.”

Each year, more athletes compete at Disney’s Wide World of Sports Complex with a yearly average of roughly 250,000 participants.

In one year alone, Disney’s competition schedule includes more than:

-3,000 basketball games

-2,400 softball games

-1,800 baseball games

-3,900 soccer matches

- (2) Amateur and youth sports is big business throughout Florida, not just at Disney World. Consider this press release:

The Florida Sports Foundation (FSF) awarded 32 grants totaling \$245,000 to sporting events throughout the State of Florida at its March, 2009 Quarterly Board of Directors meeting. The six major grant events and 26 regional grant events are expected to bring over \$75 million into Florida’s economy and over 100,000 visitors to the Sunshine State between April and December 2009.

The Amateur Athletics Union (AAU) received grants for seven youth championships being held in three Florida communities. The AAU Championships in Taekwondo, Karate, Baseball and Basketball will bring more than 24,000 visitors to Florida for competition resulting in more than \$18 million in economic impact.

Sporting events bring additional tourism to Florida causing a significant out-of-state economic impact on an annual basis. In the 2008–2009 fiscal year, the FSF has awarded 71 major and regional grants totaling over \$1.1 million. Combined, the 71 grants have a projected out of state economic impact of just under \$200 million and over 325,000 visitors to the State.

- (3) Amateur and youth sports are important to tourism. You would think a city like Nashville doesn't need any help, having both Graceland and the Grand Ole Opry. But the Nashville Sports Council, a non-profit, works hard to organize sports events. Here's more information from **nashvillesports.com**:

The Nashville Sports Council has a proven track record in creating, marketing, and implementing quality events for the community. More than 100 events have produced millions in economic development benefits for the Nashville area as well as valuable media exposure. Nearly \$300 million in economic impact has been generated since 1992. Nashville Sports Council events also serve to enhance Music City's image as a diverse community and viable sporting event destination city.

Here is information about one event, a women's softball tournament, from **nowplayingnashville.com**:

The Nashville Sports Council will host the fourth annual Music City Hits fast pitch softball tournament from June 11–15, 2008, at Drakes Creek Park in Hendersonville. The Southeast's largest college exposure tournament, last season's event featured over sixty of the top female amateur softball teams in the country. The tournament brought in an estimated impact of over \$1 million for the community.

We are anticipating another exciting week of softball. Some of the highlights of this year will include:

- Sixty-six (66) teams from all over the United States featuring some of the top female athletes ranging from ages 16 to 18.
- Over fifty (50) college coaches expected to attend.
- Over 900 participants and nearly 3000 spectators.
- Over 200 games of softball played through the duration of the tournament.
- In addition to the tournament, there will be an All-Star game featuring three teams comprised of the top softball players from the state of Tennessee.

- (4) It is not necessary for a host city to be a major destination like Nashville, but the city must have the right facilities. Here's an example of a 5-day tournament generating \$0.5 million of economic benefit for Simi Valley, California. From **simiworldseries.com**:

Simi Youth Baseball (SYB) has been selected as the host field for the 2008 & 2009 Shetland and Pinto World Series. This is the first time Simi Valley will host a World Series Tournament. Over 25 teams from around California will compete during the busy five-day event at SYB in July of 2008 & 2009.

"The economic impact of bringing the World Series and other baseball tournaments to Simi Valley is significant for the community—the 2008 World Series alone will have an estimated economic impact of over \$500,000.00" said Mike Fine, President of SYB. "Achievements like this come as a result of great partnerships and working with the community. Partnerships are an important foundation for Simi Youth Baseball and as a community, we're reaping the benefits."

"The Park District is extremely excited about the recent news of the Pony World Series," stated Ed Hayduk, Assistant General Manager of the Rancho Simi Recreation and Park District. "We are proud of the quality of the Simi Youth Baseball Complex, and are committed to supporting the tournament in any way we can."

- (5) Baseball is good, but Soccer is—wow! A regional soccer championship in North Carolina makes Simi Valley's baseball tournament seem like, well, a minor league event. From the **nc-soccer.net**:

For the first time ever, the 2008 US Youth Soccer Southern Regional Championships will be hosted by two communities when Raleigh and Wilson team for the 2008 event from June 19–25. The tournament will attract 184 Boys and Girls teams (ages 14–19) from 11 states throughout the US Youth Soccer Region III/South (Alabama, Arkansas, Florida, Georgia, Louisiana, Mississippi, North Carolina, Oklahoma, South Carolina, Tennessee and Texas).

According to the Greater Raleigh Convention and Visitors Bureau (GRCVB), it will generate approximately 20,000 total hotel room nights and an economic impact of \$4.2 million and ranks as one of the largest sporting events ever booked in the region. The tournament will be played on 10 fields at the WRAL Soccer Center in Raleigh and on 6 fields at the new J. Burt Gillette Athletic Complex in Wilson. Although the 184 teams will stay in the Raleigh area throughout the event, Wilson will also reap the economic benefits of 9,500 visitors during the soccer championship.

Recent and future host cities include Little Rock, Ark. (2002); Greensboro (2003); Austin, Texas (2004); Frisco, Texas (2005); Little Rock, Ark. (2006); Oklahoma City, Okla. (2007).

- (6) A similar story comes from Maine. (I can't explain why the economic impact is 2.5 times greater than in North Carolina. Maybe soccer players eat a lot of lobster.) From **youthsoccer.org**:

The 2008 US Youth Soccer Region I (East Regional) Championships, to be played June 26–July 1, is estimated to provide more than \$12 million in economic impact to the greater Portland, Maine, area. Local restaurants, hotels, retail stores and others will benefit from the more 5,000 players, coaches, teams and tournament officials, who also bring along their families to this six-day tournament. Visitors to the Portland area will book an estimated 31,000 room nights at area hotels. The top 268 boys and girls US Youth Soccer teams, including 19 teams from host Soccer Maine, will compete at the Bowdoin College and Falmouth High School Complex for the US Youth Soccer Region I Championships.

- (7) If you want to host a major tournament, and if you have the right facilities, you can even get a candy bar sponsor! From **foxcities.org**:

Largest Sports Tournament in Fox Cities History Arrives in 2006;
Event expected to have \$2.5 million economic impact;
First time tournament will be in Wisconsin

The Fox Cities will host the SNICKERS US Youth Soccer Region II Championships June 23–28. SNICKERS will be the largest sports tournament ever held in the Fox Cities to date, bringing in an estimated 150,000 visitors to the area. “We are truly honored to be awarded this tournament,” said Aaron Schumacher, sports sales manager for the Bureau. “This will be the first time the SNICKERS tournament will be in Wisconsin.”

The USA Youth Sports Complex in Appleton and Memorial Park/High School Complex in Neenah [will be utilized] for tournament games.

- (8) Is there room for growth? Consider the following story from the Cleveland Plain Dealer newspaper. It provides a big clue about the youth sports business and how we can put Vallejo on national and world maps. From **blog.cleveland.com/sports**:

In just its third year in existence, the Continental Cup will attract nearly 100 youth teams from around the country and around the globe to Northeast Ohio this week. It is the ultimate goal of Continental Cup officials to host the country's best 200- team elite international youth soccer tournament.

The fast-growing event for ages 10–19, which starts Wednesday at two locations in Northeast Ohio, is near halfway to its goal in just its third year. Its rapid growth—almost doubling in size this summer to 96 teams—as it approaching the top long-established youth soccer events in the U.S.: Schwan's USA Cup in Blaine, Minn. (1,000 teams), San Diego Surf Cup (338 teams) and Dr. Pepper Dallas Cup (184 teams).

“We’d like the majority to be international teams to give us an Olympic type of atmosphere,” said Continental Cup tournament director George Nanchoff Jr. This year’s Continental Cup will feature 27 international teams, including a U-17 squad from China, the U-19 Paulistano Football Club and U-16 San Paulo F.C. teams from Brazil, four teams from India, and one from Kenya. Along with teams from Canada, Mexico, Trinidad and Tobago, they’ll compete against premier and recreational area clubs and regional squads from Pennsylvania, Indiana, Illinois and Michigan, among other states.

- (9) A excellent example of a what a city can do to attract tourists is Redding, California. See attached file called **Redding youth sports complexes.pdf** (4 pages). This article from the San Francisco Chronicle is better to read in its entirety than to summarize here.
- (10) Other cities are trying to muscle in on the youth sports business. The following letter to the editor of a Texas newspaper explains why. It is written by Debi Schultz, director of the Sports Alliance, a committee of the Abilene Convention and Visitors Bureau. From **reporternews.com**:

Why Abilene needs a youth sports complex

On Jan. 20, 1891, the first official game of basketball was played at the International YMCA in Springfield, Mass. Each time a basket was scored, play was stopped while someone climbed the ladder to retrieve the basketball from the bottom of the peach basket. It was not until 1905, 14 years later, that someone was smart enough to remove the bottom of the peach basket.

I hope all of us are willing to take the risk to improve our quality of life for Abilene by changing the way the game has been played and not wait 14 more years climbing the ladder. Where would Abilene be if, in 1967, the voters did not approve funds to build the Expo Center Coliseum, airport and Civic Center?

The Abilene Convention and Visitors Bureau has made the sports market a priority because it complements our central location, hotels and family friendly reputation. Therefore, it is the largest market segment, booking 42 percent of the group business. Of the 91 total sports events booked last year, 24 were youth related in the following events: two soccer; three girls/boys basketball; 14 tennis (thank you Rose Park!); one softball; one baseball; one golf and two football games.

It seems simple to me: the youth sports complex creates new business, generating new revenue for the city, a health benefit and additional activity for our kids and grandkids. The Abilene Youth Sports Authority Complex is a great example of finding a new way to play if we want to win in the long run. These are the top 10 reasons to say “yes” for a youth sports complex! The complex will:

1. Provide economic growth and generate greater sales tax revenue by hosting new tournaments through one of Abilene's greatest economic generators—tourism. Tourism boosts our local economy by \$350 million, provides 3,740 jobs and local taxes of \$5.8 million. The breakdown of visitor expenditures are: food—19 percent; transportation—36 percent; lodging—11 percent; shopping—21 percent and entertainment/recreation—13 percent; all of these commodities generate tax dollars.

Tourism is economic development!

- (11) The above letter goes on to describe other benefits, including an improved quality of life. I mention this now because it redounds to economic benefits which are real but hard to quantify. For further discussion of this point, see attached file called **Benefits of Parks and Rec (Columbia, MO).pdf** (7 pages).
- (12) “Youth sports” is all-encompassing. It includes softball, baseball, soccer, lacrosse, tennis, volleyball, basketball, gymnastics, martial arts... It also includes something we don't think of as much in California: hockey. This is made clear in an economic report about the Duluth Heritage Sports Center in Minnesota. From **duluthheritagesportscenter.com**:

It was estimated in 1999 that youth hockey activities generated \$10,500,000 annually to Duluth's economy during the winter months. The new Heritage Sports Center will operate year round to provide Duluth the opportunity to become a destination for national tournaments, camps, and training. The impact of the Center has been calculated at \$2,000,000 annually on top of the existing tourism benefit. In addition to the impact of youth hockey to Duluth's economy, the Heritage Sports Center will leverage \$41,000,000 of private and public investments at Clyde Park [a nearby redevelopment project].

In this case, the investment in a center based upon youth sports will create a redevelopment initiative which truly merges the best of a non-profit corporation, city, state, school district, and private investment under one plan.

- (13) A youth sports facility can generate a huge return on a small investment. Consider the Hampton Roads Soccer Complex in Virginia. It was developed at a cost of \$2.8 million, privately raised, no tax dollars. Here is more information from **soccercomplex.org**:

The Hampton Roads Soccer Complex is located in Virginia Beach on 75 acres of property owned by the City of Virginia Beach and leased to the Hampton Roads Soccer Council for \$1.00 per year. The land was privately developed into 19 quality soccer fields, consisting of 5 small-sided fields, 3 junior fields, and 11 full size fields.

Development to date of \$2.8 million has been funded by soccer community assessments, corporate donations, foundation grants and fund raising events such as the North American Sand Soccer Championships.

The Soccer Complex is operated and maintained exclusively by the Hampton Roads Soccer Council staff, with all expenses funded by field rentals, concession sales and affiliate club assessments. No public monies are used to provide this recreational support facility for the City of Virginia Beach.

Over 7,000 soccer matches are played each year the Complex, including 12 regional tournaments, youth travel and recreation “advanced” matches, men’s, women’s and adult coed league matches, Special Olympics, State Cup and ODP events.

Activities at the Soccer Complex generate an annual recurring economic impact of over \$8 million each year from the 60,000 out of town visitors attending soccer tournaments and matches. Additionally, the Complex provides recreational opportunities to 15,000 residents of Virginia Beach.

- (14) A final “case study” worth mentioning is Frisco, Texas. The city integrated a soccer complex into a much larger project. The fields are across the street from Frisco Town Square, a mixed-use development which includes office, retail, residential, and government buildings. The soccer complex, called “Pizza Hut Park”, is most definitely a for-profit venture. Its 20,000 seat stadium is home to a major league soccer team. Aside from the usual stadium amenities, only a parking lot separates the youth playing fields from restaurants, sporting goods stores, etc. From **pizzahutpark.com**:

Pizza Hut Park is home to 17 championship quality soccer fields, not including the stadium field. This incredible soccer complex is the host of the best boy’s and girl’s soccer leagues in north Texas, as well as for Frisco Soccer Association... [The fields are] utilized for a myriad of purposes and events on a year-round basis, including but not limited to soccer camps, academies, league play, corporate functions, high school sports, FC Dallas training, as well as local, regional, national and international soccer tournaments.

Additionally, Pizza Hut Park will be home for a variety of tenants, including Baylor Health Care System, which will build a permanent 6,500 square foot rehabilitation center and will be connected to the northwest side of the stadium. Other tenants include the regional headquarters for the North Texas State Soccer Association, the national headquarters for US Youth Soccer, and the front office staff for Pizza Hut Park and FC Dallas.

It is believed that this unique facility is the first venue of its type ever created—a stadium and soccer park of such size coupled together into one facility. “The benefits of this development will reverberate throughout the world,” said Garber. “North Texas is a bastion for youth soccer, and this Frisco project provides international exposure for soccer at all levels in the United States.”

Conclusion

I believe the dollar amounts reported here are modest compared to what a youth and amateur sports complex in Vallejo could produce, given its location, high visibility and lack of competition. Obviously I am not able to do the kind of analysis that is necessary to determine the total or exact economic benefit to the city and county. Besides, the figures will ultimately depend on what gets built—i.e., the mix between sports and entertainment, open space, retail and office. It also depends on whether local residents are comfortable selling naming rights or turning the whole venture over to a for-profit company. Those questions can be put off for a while. My immediate goal is just to provide Vallejo/Solano community with an alternate “vision” for the fairgrounds. If there is interest, then I hope Solano360 will consider it in good faith along with the plan put forth by Brooks Street.

Respectfully submitted by:

Dan Levin
dlevin@educaide.com

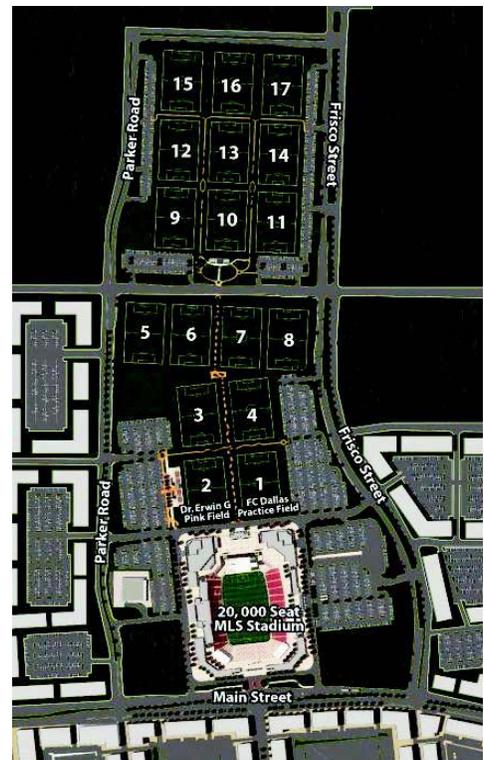
Home:
33 Santa Paula Way
Vallejo, CA 94590
707-645-9461

Office:
EducAide Software
237 Georgia St
Vallejo, CA 94590
707-554-6505



Pizza Hut Park and
Soccer Complex, Frisco, TX

Frisco Town Center development is
shown in background of top photo





Proposed Soccer Complex for Harlingen, TX (Rio Grand Valley)



Soccer Complex in Shelby County, TN



Sports Complex in Arkadelphia, AR (in development)

Burbank Park
Soccer Complex
Ballfield Complex
Dog Park

Improvements include through the
original four fields (fields 1-4) and
the Ball Field Complex



Sports Complex in Baton Rouge, LA
(expanded from 12 to 22 fields in 2008)



Baseball Complex in Carlsbad, NM



Mountain Creek Park and Baseball Complex, Grand Prairie, TX



Hampton Roads Soccer Complex Virginia Beach, VA

Hampton Roads Soccer Complex Hotline - (757) 518-5176

DIRECTIONS

• **From I-64 - Indian River Road Exit 286B**

Proceed east on Indian River Road bearing left onto Ferrell Pkwy. After road merges with Princess Anne Road, turn right at 4th light onto Concert Drive, then right again onto Recreation Drive.

• **From I-264 Expressway**

Take Exit 17A (S. Independence) and continue on South Independence as it bears right. Follow for 3 miles and turn left on Princess Anne Rd., right at Concert Dr. and right again on Recreation Dr.

• **From the Virginia Beach Resort area**

Take Pacific Ave. South - it turns into General Booth Blvd. Turn right onto Dam Neck Rd., follow for 5 miles. At Princess Anne Rd. light, turn right. At next light, turn left onto Concert Dr., then right on Recreation Dr.

• **Back Entrance & Additional Parking**

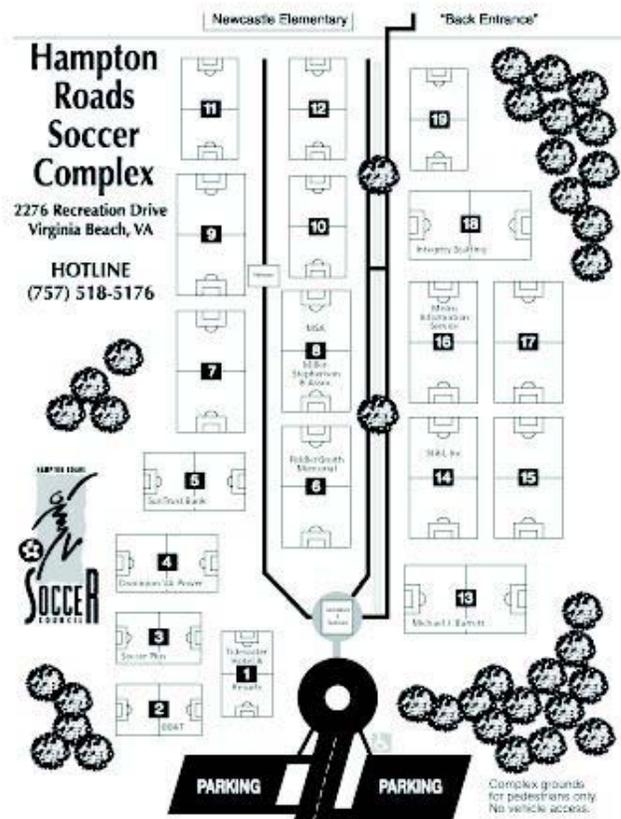
From Princess Anne Rd., turn west onto Dam Neck Rd. (toward Amphitheater), and follow around curve to New Castle Elementary, and park in school lot. Back entrance is behind the school.



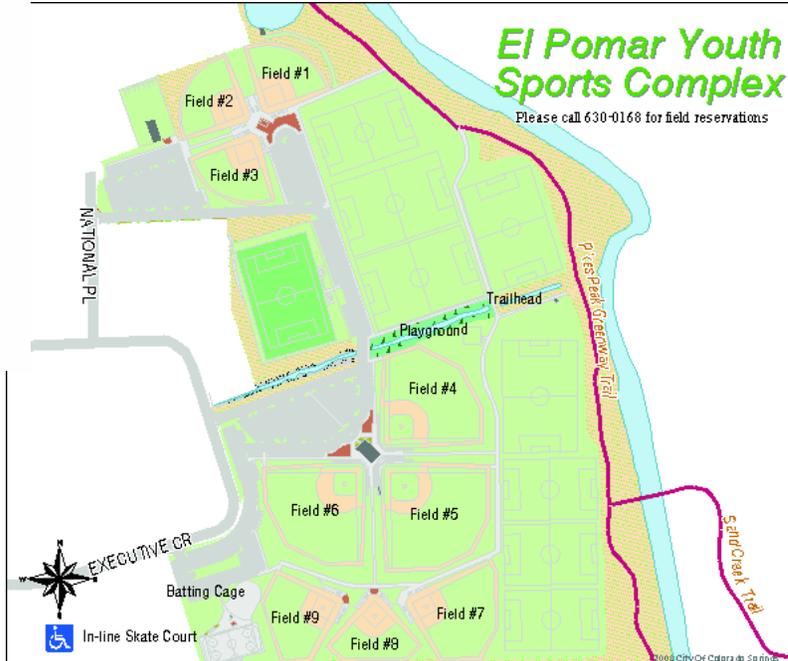
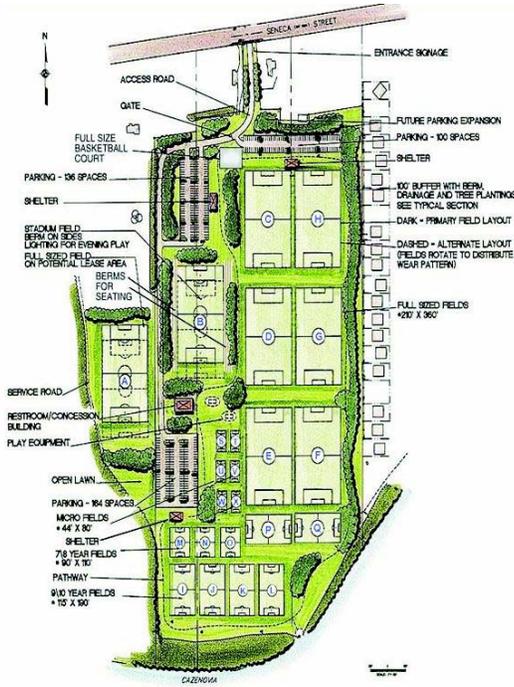
Rules & Regulations

- No dogs or other animals
- No alcohol allowed
- Permission required for any selling or solicitations
- Goals are not to be moved without authorization
- No unauthorized parking in center circle
- No parking on street, at parking lot entrances or along berm
- No littering please

For more information, contact HRSC office (757) 368-4600.



West Seneca, NY



El Pomar Youth Sports Complex
Please call 630-0168 for field reservations

Colorado Springs, CO



Conceptual Site Plan
Abilene Youth Sports Authority

The Title Luther Partnership, LLP

Abilene, TX

Dan Levin (LEV)

Response to LEV-1

The commenter provided introductory remarks. No response is necessary.

Response to LEV-2

The commenter stated that the Solano360 Specific Plan is inconsistent with the original Project Vision. The commenter did not provide specific details about why the Specific Plan is inconsistent with the original Project Vision. The commenter expressed concern about the legal basis for going forward with the project and concern for opportunities for public comment.

The Solano360 Specific Plan (Plan) prepared as a result of the City of Vallejo, the Solano County Fair Association, and the County of Solano's joint visioning process for the redevelopment of the Fairgrounds site that had culminated in the preparation of the Solano360 Vision Report in 2009. Through that visioning process, and as articulated in the approved Solano360 Vision Report, the County and City determined that Solano360 will be a project that is unique to Solano County and outlying areas, and is intended to be a regional destination for entertainment, with supporting retail, hotel, office, and other uses. The Solano360 Vision Report set forth a conceptual program of entertainment, commercial, and mixed-use development. As part of the Specific Plan and EIR process, a market study indicated that it would be challenging for the amount and type of retail, office, and hotel uses previously proposed in the Solano360 Vision Report to be feasibly supported in the foreseeable future. Based on the market study, the land use program for the Specific Plan was changed from the program initially considered in the Vision Plan. A table providing those changes will be included in the Final Specific Plan.

The Memorandum of Understanding (MOU) between the City of Vallejo and Solano County, as restated and amended throughout the visioning and planning process of the Project but still in effect, serves as the basis of legal authority to move forward by providing the contractual mechanism from which the parties have worked cooperatively to process the entitlements through their concurrent jurisdictions. Concerning the adequacy and content of the Draft EIR, consistency with the Solano360 Vision Report is not analyzed as an impact, nor is it considered a potential environmental impact under CEQA. No additional response is necessary.

Response to LEV-3

The commenter provided detailed comments concerning the content of the Fiscal Impact Analysis. The Fiscal Impact Analysis is a separate document from the Draft EIR. As stated in CEQA Guidelines Section 15064(e):

Economic and social changes resulting from a project shall not be treated as significant effects on the environment

The Draft EIR does not contain financial information because it is focused on environmental, rather than financial, impacts. The court made clear that an EIR focuses on the environment (*San Franciscans Upholding the Downtown Plan v. City and County of San Francisco* [2002] 102 Cal. App. 4th 656, 689). As such, an EIR is not required to provide an “economic or cost analysis” (ibid. at 691). Therefore, an agency is not required to include economic or financial information in an EIR (ibid. at 691, citing *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal. App. 4th 704, 715 fn.3).

Response to LEV-4

The commenter provided comments to the Fiscal Impact Analysis’ treatment of parking. The commenter provided that traffic problems and other conflicts could occur with paid parking. Draft EIR Table 3.11-7 parking totals by phase and by land use type. The CEQA Guidelines Appendix G criteria for parking capacity was removed from the Transportation/Traffic Impact section in the CEQA Guidelines Amendments effective March 18, 2010. Significance determinations must be based on substantial evidence, not argument, speculation, or unsubstantiated opinion or narrative. According to Section 15064 (f)(5) of the CEQA Guidelines, “Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts.” The potential for the project to generate traffic problems or other environmental impacts due to parking pricing is currently speculative. No further response is necessary

Response to LEV-5

The commenter recommended that a major youth and amateur sports complex be analyzed as a viable project alternative. As stated in the Solano360 Specific Plan, while the Entertainment Commercial site is intended to accommodate a larger destination amusement or theme park, permitted uses include indoor and outdoor participant sports facilities. As stated in Response to CHA-10, CEQA Guidelines Section 15126.6 states an EIR need not consider every conceivable alternative to a project. In addition, a major youth and amateur sports complex alone would not meet the project’s objectives. No further response is necessary.

Response to LEV-6

The commenter provided concluding remarks to close his letter. No response is necessary.

Chryss Meier - Dear Ms. Heppner,

From: I Am <imaroscoe@yahoo.com>
To: "mheppner@solanocounty.com" <mheppner@solanocounty.com>
Date: 1/10/2013 12:49 AM
Subject: Dear Ms. Heppner,

Dear Ms. Heppner,

I am a resident of Vallejo, and I thank you for the opportunity to comment of the draft EIR for the Solano 360 project.

I am concerned that the Draft EIR does not address...

... how an additional 28 acres of parking and roads in this project will impact Ridler Creek and the water quality in Lake Chabot.

... the impact on predatory birds in the area who rely on open areas for hunting and habitat. If we pave over so much of the fairgrounds area, this land will permanently be paved.

... the increase in vehicle traffic in the long term that would be due to this project. This project is designed around and for people in cars. The EIR does not consider the total increase in car traffic and emissions over time that will be a result of 18 more acres of parking and 10 more acres of roads.

...any "smart growth" alternatives that favor walkable communities, bike paths, larger green spaces and parks. What if one of the alternatives was a 100-acre urban farm with a retreat space and learning center? The only alternatives examined were scaled down versions of the Solano 360 Plan, plus the "do nothing" alternative.

imaroscoe@yahoo.com

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Ima Roscoe (ROS)

Response to ROS-1

The commenter provided introductory remarks. No response is necessary.

Response to ROS-2

The commenter asked how the additional parking and roads would impact Rindler Creek and the water quality in Lake Chabot. Refer to Responses to CHA-6 and CHA-7 for further discussion.

Response to ROS-3

The commenter stated that predatory birds in the area rely on open area for hunting and habitat, and expressed a concern for paving portions of the fairgrounds area. Refer to Response CHA-8 for further discussion.

Response to ROS-4

The commenter stated that she wants the increase in vehicle traffic attributable to the project to be examined. Refer Response to CHA-9 for further discussion.

Response to ROS-5

The commenter stated that she wants the smart growth alternatives to be examined and asked about the use of an urban farm with retreat space and learning center. Refer to Response to CHA-10 for further discussion.

Chryss Meier - Fwd: Draft EIR for Solano 360 Project

From: "Jason Brandman" <JBrandman@brandman.com>
To: Chryss Meier <CMeier@brandman.com>
Date: 1/10/2013 8:36 AM
Subject: Fwd: Draft EIR for Solano 360 Project

Sent from my iPhone

Begin forwarded message:

From: "Heppner, Michelle" <MHeppner@SolanoCounty.com>
Date: January 10, 2013, 8:13:42 AM PST
To: "Corsello, Birgitta E." <BECorsello@SolanoCounty.com>, "Curry, Bernadette S." <BSCurry@SolanoCounty.com>, "Emlen, Bill F." <WFEmlen@SolanoCounty.com>, "EShreeve@SWAGroup.com" <EShreeve@SWAGroup.com>, "Huston, Nancy L." <NLHuston@SolanoCounty.com>, Jason Brandman <JBrandman@brandman.com>, Tom Sinclair <tsinclair@municipalresourcegroup.com>
Subject: FW: Draft EIR for Solano 360 Project

One more.

Michelle Heppner

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From: Monica Tipton [<mailto:monicatipton@mac.com>]
Sent: Wednesday, January 09, 2013 3:40 PM
To: Heppner, Michelle
Cc: marian swanson; Bay Terrace
Subject: Draft EIR for Solano 360 Project

As a resident of Vallejo, I am deeply concerned about the impact of the proposed Solano 360 project on the quality of life for Vallejoans. Please include the following comments in the final Environmental Impact Report. 1

Our air quality here in Vallejo is tenuous due to the extensive traffic on the three major highways that intersect here, and due to the impact of the oil refineries in the surrounding cities. Further negative influence on our air quality would jeopardize the health of thousands, and most especially those with respiratory conditions. With a projected build out time of over 15 years, the additional air pollution will effect two to three generations of 2

residents. Here is the Section 3.2 of the EIR that states this concern.

Impact AIR-1: The project may conflict with or obstruct implementation of the applicable air quality plan.

MM AIR-1: The project shall exceed Title 24 energy efficiency standards by at least 15 percent.

Significant and unavoidable impact.

Building out an environmentally sensitive watershed area is ill-advised at best. Not only does the EIR reflect a substantial impact of the biological (Section 3.3) and geological (3.5) conditions in the area during development, it does not mention rising water tables and sea levels that are being currently evidenced as a result of global warming.

The EIR was created using the 1983 General Plan for the City of Vallejo. Since that time, public services have been severely reduced. Those reductions are not reflected in the EIR (Section 3.10) nor the GP. To imply "no significant impact" does not reflect the reality of the current situation.

Existing seasonal traffic interferes with our ability to freely access or egress the city.

Exacerbating these conditions with additional traffic as evidenced in the EIR in section 3.11 Impact Trans 1, 2, 8, & 9 puts our citizens in potential danger should there be a need to evacuate the area or in the case of a personal emergency that requires rapid travel to or from town. The additional traffic burden can not be borne under the existing highway conditions.

Attempts to mitigate those conditions, if that is possible, would make things worse for at least the three to five years needed to complete any highway improvements. This is unacceptable.

Certainly in the 21st Century, we should know better than to continually pave paradise to put in yet another parking lot (apologies to Joni Mitchell). I commend Michael Brandman Associates for providing the citizens of Vallejo with a comprehensive report of the environmental impact of the proposed "Solano 360 Project." It is clear that environmental and fiscal concerns make this project inadvisable for the City of Vallejo and Solano County. The citizens of Vallejo suffer twice should this project be approved.

Thank you for your attention to my concerns,

Sincerely,

Mónica Hutchens Tipton
141 B Street
Vallejo, CA 94590
707.652.5642

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Mónica Hutchens Tipton (TIP)

Response to TIP-1

The commenter provided introductory remarks. No response is necessary.

Response to TIP-2

The commenter provided background information for the air quality concerns in the project area, and provided the summary of Impact AIR-1 from the Draft EIR. No response is necessary.

Response to TIP-3

The commenter stated that building in an environmentally sensitive watershed is ill-advised. The commenter referred to the Biological Resources section and the Geological and Soils section. The commenter identified that the Draft EIR did not address rising water tables or sea levels that would result from global warming. Rising water tables are not an identified potential impact from global warming. However, it is understood that climate change could result in sea level rises.

The Pacific Institute, with support from the California Energy Commission, California Department of Transportation, and the Ocean Protection Council, prepared maps showing the potential extent of coastal flooding and erosion under one scenario that involved a sea level rise of 1.4 meters (55 inches). This scenario represents the medium to high greenhouse gas emissions scenarios but does not reflect the worst case that could occur. The scenario estimates that the 1.4-meter sea-level rise could occur by 2100. The lowest elevation at the project site is approximately 85 feet, or 26 meters, above current sea level. Therefore, the project site is outside the predicted area of inundation.

Response to TIP-4

The commenter indicated that the analysis of public services is inadequate, because the 1983 General Plan for the City of Vallejo was utilized in preparation of the Draft EIR, but public services have been severely reduced since the date of that General Plan. Although the 1983 General Plan was utilized for portions of the Draft EIR, the public services analysis also utilized current provider information. As stated in Section 3.10, Public Services, the section utilized multiple resources, including public service agency responses to questionnaires circulated specifically to gather data for this Draft EIR.

Response to TIP-5

The commenter expressed concern that seasonal traffic would exacerbate the traffic impacts. The Draft EIR acknowledges the congestion that occurs on summer weekend days, and assesses conditions for the regularly recurring peak hours on summer Saturdays, although it does not assess conditions for the “peak of the peak” days when attendance at Six Flags Discovery Kingdom and/or the Fairgrounds is at its highest. The standard practice for analysis under CEQA is to capture the regularly recurring peak traffic time for the study area, not the absolute or “peak of peak” scenario. This is why it is typical to study the weekday commute peak hours; however, for this project and study area, the regularly recurring peak times occur on summer weekends from May to October. The Draft EIR identifies mitigations to reduce traffic congestion impacts for the regularly recurring Saturdays; however, impacts would not be mitigated to a less than significant level. The construction

of the Fairgrounds Drive/Redwood Parkway Interchange Improvement project (Interchange Project), which the Solano Transportation Authority and Caltrans are planning and to which the project would contribute its fair share of funding, will improve traffic-carrying capacity. Refer to Response to CALTRANS-10 for additional discussion.

It is true that temporary construction period delays will occur while that project is constructed. Infrastructure projects such as the Interchange Project typically have detailed, phased traffic management plans to minimize the impacts on local traffic access and circulation during construction.

Response to TIP-6

The commenter commended the Draft EIR preparers for providing a comprehensive report of the environmental impacts of the proposed project, and stated general disapproval of the project. Comment noted. No further response is required.

SECTION 3: ERRATA

The following are revisions to the Draft EIR for the Solano360 Specific Plan. These revisions are minor modifications and clarifications to the document, and do not change the significance of any of the environmental issue conclusions within the Draft EIR. The revisions are listed by page number. All additions to the text are underlined (underlined) and all deletions from the text are stricken (~~stricken~~).

3.1 - Changes in Response to Specific Comments

Section ES, Executive Summary and Section 3.3, Biological Resources

Pages ES-18 and 3.3-16

The following addition has been added to pages ES-18 and 3.3-16 to Mitigation Measure BIO-1b at the request of the California Department of Fish and Game:

MM BIO-1b **Migratory Birds and Raptors:** A qualified biologist shall conduct a preconstruction survey for nesting migratory birds and tree-nesting raptors in all trees occurring within 500 feet of construction areas. Pre-disturbance surveys shall also be conducted prior to tree trimming or tree removal. These surveys should be conducted within 30 days of initial ground disturbance activities within the project site, if such disturbance occurs during the breeding season (February 1 to August 31).

Avoidance. Conduct construction, tree trimming, and/or tree removal within areas supporting avian nesting habitat during the non-breeding season (September 1 to January 31).

Minimization. If protected birds (including raptors) are detected, a construction-free buffer (appropriately sized based on species) shall be established around each active nest and monitored by a qualified biologist for the duration of the breeding season or until it is determined the young have fledged. Pre-construction avian surveys are not required during the non-breeding season, as birds are expected to abandon their roosts if disturbed by construction, tree trimming, or tree removal.

Burrowing Owls: Surveys will be conducted in suitable burrowing owl habitat, including a 500-foot buffer of the proposed work area. Because the Planning Area will be developed over an extended length of time and because of the low-quality burrowing owl habitat onsite, pre-construction burrowing owl surveys will be conducted within 14 days prior to the start of any new construction phase, regardless of the time of year. Since burrowing

owls may overwinter at a site, surveys should be conducted prior to any construction planned during either the nesting season (typically February 1 until August 30) or the non-breeding season.

The California Department of Fish and Wildlife will be notified in the event that owls occupy the Plan Area or adjacent lands. In the event that burrowing owl are observed onsite, an assessment of project related impacts and long-term conservation requirements will be conducted to determine the appropriate avoidance, minimization and/or mitigation measures based on the current site conditions. Measures may vary from passive relocation to offsite habitat compensation, depending on a number of environmental and biological factors.

Pages ES-18 and 3.3-22

The following amendment has been added to page ES-18 as revised language to Mitigation Measure BIO-2 (4)(D) Fiber Rolls:

- D. ~~Fiber Rolls~~Coconut Coir Matting or Tackified Hydroseeding Compounds – Fiber rolls that consist of straw that is wrapped in tubular black plastic netting are prohibited. These rolls are used extensively in the construction industry due to their cost-effectiveness. However, plastic monofilament or similar material containing netting are known to entangle or trap amphibians. If installed correctly, ~~straw rolls~~ coconut coir matting or tackified hydroseeding compounds will capture and keep sediment and minimize sheet and rill erosion until permanent vegetation can established. Installed, ~~straw rolls~~ these materials shorten the slope length, thereby interrupting the erosion processes. Organic matter and native seeds are trapped behind the ~~rolls~~ erosion control material, which provides a stable medium for germination.

It is imperative, especially on steeper slopes, that a sufficient installation and monitoring be implemented ~~trench is constructed to place the roll in. Without it, the roll will not so~~ that the erosion control material will function properly, runoff will not scour underneath it, and trees or shrubs planted behind the roll will ~~not~~ have a stable environment in which to become established. ~~Straw rolls will last an average of one to two years and are a relatively low cost solution to sheet and rill erosion problems.~~ This effective control life of the chosen material is an important factor when planning the optimum length of time the slope or construction site will need mechanical stabilization. ~~Fiber rolls can~~ shall be staked with willow stakes if site conditions warrant, and the moisture retained by the fiber roll will encourage willow establishment. ~~Plastic netting will eventually photodegrade, eliminating the need for retrieval of materials after the straw has broken down.~~

Page ES-42

The following amendment is made to page ES-42, Table ES-1 as revised language under the heading, “Mitigation Measures”:

~~No mitigation is necessary.~~ Implementation of Mitigation Measure TRANS-8 (which references Mitigation Measure TRANS-1) will reduce the level of this impact.

Section 3.11, Transportation/Traffic

Page 3.11-14

The following addition is made to page 3.11-14, Table 3.11-4 to revise the intersection name:

16. Redwood Street/Admiral Callaghan Lane/I-80 Eastbound Off-ramp

3.2 - Changes in Response to Staff Recommendations

Appendix J: Water Supply Assessment

Page 7

The following addition is made to page 7 of the Water Supply Assessment as recommended by staff:

Vallejo Permit Water is delivered from the NBA pumping facility at Barker Slough to the DWR Forebay at Cordelia. Vallejo Permit Water may be diverted to supply Travis Air Force Base before reaching the DWR Forebay. From the DWR Forebay at Cordelia it is pumped by City facilities to the Fleming Hill WTP. Conveyance of Vallejo Permit Water through the NBA is projected to become available in 2015.

Page 9, Table 7

The following modification and addition have been made to page 9, Table 7, of the Water Supply Assessment as recommended by staff:

**TABLE 7. CITY OF VALLEJO PROJECTED WATER DEMANDS BY CATEGORY
IN ACRE-FEET PER YEAR (AFY)**

Category	2010 _s	2015	2020	2025	2030	2035
City of Vallejo Water System ₁	18,324 24,290	25,690	27,140	27,140	27,140	27,140
Vallejo Lakes System	427 340	350	360	370	380	390
Wholesale Customers						
Travis AFB Deliveries	2,320 3,860	4,330	4,790	5,250	5,250	5,250

**TABLE 7 (cont.). CITY OF VALLEJO PROJECTED WATER DEMANDS BY CATEGORY
IN ACRE-FEET PER YEAR (AFY)**

Category	2010 ₃	2015	2020	2025	2030	2035
City of Benicia	<u>841</u> 1,100	1,100	1,100	1,100	1,100	1,100
City of American Canyon	<u>688</u> 750	750	750	750	750	750
Subtotal	<u>3,489</u> 5,710	6,180	6,640	7,100	7,100	7,100
Other Demands	<u>1,500</u> 1,000	1,000	1,000	1,000	1,000	1,000
Solano360 Specific Plan₂	0	94.4	188.8	188.8	188.8	188.8
Total Demands	<u>24,100</u> 31,340	33,314	35,329	35,799	35,809	35,819

Notes:

1. City of Vallejo System includes Single Family, Multi-Family, Commercial, industrial, institutional, landscaping, governmental, recreational, nonbilled metered use, unaccounted for water and golf course irrigation.
2. Water demands associated with the Project are assumed to be 50% of total anticipated demand in 2015. Build-out of project expected by 2020.
3. Water Demands for 2010 are actual water use, not projected demand from the 2005 UWMP based on metered records and use data obtained from the City (Sahin, 2013).

Source: City of Vallejo 2006

Page 12, Table 9

The following modifications have been made to page 12, Table 9, of the Water Supply Assessment as recommended by staff:

TABLE 9. ADJUSTED WATER SUPPLIES FOR NORMAL AND DRY WATER YEARS ACRE FEET PER YEAR

Water Year		2010	2015	2020	2025	2030	2035
Normal Year							
State Water Project	10%	5,040	5,040	5,040	5,040	5,040	5,040
Vallejo Permit Water	0%	<u>17,200</u> 22,800	22,800	22,800	22,800	22,800	22,800
Lakes Madigan/Frey	0%	400	400	400	400	400	400
Lake Curry Solano	0%	1,500	3,750	3,750	3,750	3,750	3,750
Project Water	1%	14,454	14,454	14,454	14,454	14,454	14,454
Normal Year Total		<u>38,594</u> 44,194	46,444	46,444	46,444	46,444	46,444
Single Dry Year							
State Water Project	39%	3,416	3,416	3,416	3,416	3,416	3,416
Vallejo Permit Water	15%	<u>14,620</u> 19,380	19,380	19,380	19,380	19,380	19,380
Lakes Madigan/Frey	20%	320	320	320	320	320	320
Lake Curry Solano	20%	1,200	3,000	3,000	3,000	3,000	3,000
Project Water	2%	14,308	14,308	14,308	14,308	14,308	14,308

TABLE 9 (cont.). ADJUSTED WATER SUPPLIES FOR NORMAL AND DRY WATER YEARS ACRE FEET PER YEAR

Water Year		2010	2015	2020	2025	2030	2035
Single Dry Year Total		<u>33,864</u> 38,624	40,424	40,424	40,424	40,424	40,424
<i>Second Dry Year</i>							
State Water Project	50%	2,800	2,800	2,800	2,800	2,800	2,800
Vallejo Permit Water	20%	<u>13,760</u>	18,240	18,240	18,240	18,240	18,240
		18,240					
Lakes Madigan/Frey	25%	300	300	300	300	300	300
Lake Curry Solano	25%	1,125	2,813	2,813	2,813	2,813	2,813
Project Water	5%	13,870	13,870	13,870	13,870	13,870	13,870
Second Dry Year Total		<u>31,855</u> 36,335	38,023	38,023	38,023	38,023	38,023
<i>Third Dry Year</i>							
State Water Project	61%	2,184	2,184	22,184	2,184	2,184	2,184
Vallejo Permit Water	25%	<u>12,900</u>	17,100	17,100	17,100	17,100	17,100
		17,100					
Lakes Madigan/Frey	25%	300	300	300	300	300	300
Lake Curry Solano	25%	1,125	2,813	2,813	2,813	2,813	2,813
Project Water	8%	13,432	13,432	13,432	13,432	13,432	13,432
Third Dry Year Total		<u>29,941</u> 34,141	35,829	35,829	35,829	35,829	35,829

Source: City of Vallejo 2006

Page 16, Table 10

The following modifications have been made to page 16, Table 10, of the Water Supply Assessment as recommended by staff:

TABLE 10. COMPARISON OF CITY OF VALLEJO WATER SUPPLIES AND PROJECTED WATER DEMANDS

Water Year	2010	2015	2020	2025	2030	2035
<i>Normal Year</i>						
Supply	<u>38,594</u>	46,444	46,444	46,444	46,444	46,444
	44,194					
Demand	<u>24,100</u>	33,314	35,329	35,799	35,809	35,819
	31,340					
Difference = Surplus or (Deficit)	<u>14,494</u>	13,130	11,115	10,645	10,635	10,625
	12,854					
Difference (as percentage of supply)	<u>38%</u>	28%	24%	23%	23%	23%
	29%					
<i>Single Dry Year</i>						
Supply	<u>33,864</u>	40,424	40,424	40,424	40,424	40,424
	38,624					
Demand	<u>24,100</u>	33,314	35,329	35,799	35,809	35,819
	31,340					
System Efficiencies (1% Vallejo City System)	(243)	(257)	(271)	(271)	(271)	(271)

TABLE 10 (cont.). COMPARISON OF CITY OF VALLEJO WATER SUPPLIES AND PROJECTED WATER DEMANDS

Water Year	2010	2015	2020	2025	2030	2035
Difference = Surplus or (Deficit)	<u>10,007</u> 7,527	7,367	5,366	4,896	4,886	4,876
Difference (as percentage of supply)	<u>30%</u> 19%	18%	13%	12%	12%	12%
Second Dry Year						
Supply	<u>31,855</u> 36,335	38,023	38,023	38,023	38,023	38,023
Demand	<u>24,100</u> 31,340	33,314	35,329	35,799	35,809	35,819
System Efficiencies (2% Vallejo City System)	(486)	(514)	(543)	(543)	(543)	(543)
Difference = Surplus or (Deficit)	<u>8,241</u> 5,481	5,223	3,237	2,767	2,757	2,747
Difference (as percentage of supply)	<u>26%</u> 15%	14%	9%	7%	7%	7%
Demand with Drought Response	<u>23,614</u> 30,854	32,800	33,047	33,493	33,503	33,512
Difference With Drought Response	<u>8,241</u> 5,481	5,223	4,976	4,530	4,520	4,511
Difference with Drought Response (percentage of supply)	<u>26%</u> 15%	14%	13%	12%	12%	12%
Third Dry Year						
Supply	<u>29,941</u> 34,141	35,829	35,829	35,829	35,829	35,829
Demand	<u>24,100</u> 31,340	33,314	35,329	35,799	35,809	35,819
System Efficiencies (3% Vallejo City System)	(729)	(771)	(814)	(814)	(814)	(814)
Difference = Surplus or (Deficit)	<u>6,570</u> 3,530	3,286	1,314	844	834	824
Difference (as percentage of supply)	<u>22%</u> 10%	9%	4%	2%	2%	2%
Demand with Drought Response	<u>23,371</u> 30,611	29,289	31,063	31,486	31,495	31,504
Difference With Drought Response	<u>6,570</u> 3,530	6,540	4,766	4,343	4,334	4,325
Difference with Drought Response (percentage of supply)	<u>22%</u> 10%	18%	13%	12%	12%	12%

Notes:

1. Annual water demands shown in Table 10 include all City demands (Vallejo City System, Vallejo Lakes System, Travis, Benicia, American Canyon and Other as well as the water demands associated with the Project.
2. System efficiency demand reduction based on data presented in City’s UWMP and is for sub-category Vallejo City System which is only a portion of the total water demands shown above.

Page 17

The following revision has been made to page 17 of the Water Supply Assessment as recommended by staff:

The City's total projected water supplies during normal and single dry years during a 20 year projection will meet the projected water demands associated with the Project in addition to existing and planned future uses. Annual supplies will exceed demands on the order of 12 to 2938 percent per year.

