This appendix presents comment letters received in response to the Notice of Preparation and Revised Tiered Initial Study for the Conference Center, Hotel, and Graduate School of Management Building project that was circulated from August 17, 2001 to September 17, 2001. Each letter and each comment within a letter has been given a number. Responses are numbered so that they correspond to the appropriate comment. For example, the first comment in Comment Letter 1 is numbered 1-1.

Letter 1: Jeffrey Pulverman, Chief, Office of Regional Planning  
California Department of Transportation  
September 18, 2001

Letter 1.2: Harry Y. Yahata, District Director  
California Department of Transportation  
September 14, 2001

Letter 2: Christine Palisoc, Environmental Scientist, Storm Water Unit  
California Regional Water Quality Control Board  
September 6, 2001

Letter 3: Larry L. Eng, PhD, Assistant Regional Manager  
California Department of Fish and Game  
September 20, 2001

Letter 4: Ken Wagstaff, Mayor  
City of Davis  
September 14, 2001

Letter 5: Fred Buderi  
September 17, 2001

Letter 6: Marcie Kirk Holland  
UC Davis Internship and Career Center  
August 17, 2001
September 18, 2001

01YOL0054
SCH #2001082067:
UC Davis Conference Center, Hotel and Graduate School of Management Building
NOP: Tiered Initial Study
03YOL080 PM 0.001

Sid England
University of California, Davis
Office of Resource Management and Planning
One Shields Avenue
Davis, CA 95616

Dear Mr. England:

Thank you for the opportunity to comment on the UC Davis Conference Center, Hotel and Graduate School of Management Project. Our comments are as follows:

- A Traffic Impact Study (TIS) should be prepared to assess the project. The “Guide for the Preparation of Traffic Impact Studies” is enclosed for reference. Specifically, the proposed project could create significant traffic impacts to the Interstate 80/Old Davis Road eastbound and westbound off-ramp intersections. This should be addressed in the TIS.

- The TIS should incorporate the following scenarios:
  - Existing conditions without the project (current year).
  - Existing conditions plus any proposed phasing of the project.
  - Cumulative conditions (without the project).
  - Cumulative conditions (with project build-out).

- The TIS should provide a Level of Service (LOS) analysis for freeways, ramps and ramp terminal intersections. A merge/merge analysis should be performed for freeway and ramp junctures, all analysis should be based on AM and PM peak hour volumes. The analysis should include the (individual, not averaged) LOS and traffic volumes applicable to all intersection road approaches and turn movements. The procedures contained in the 1997 Update to the Highway Capacity Manual along with the Guide for the Preparation of Traffic Impact Studies should be used as a guide for the TIS.

- Mitigation measures should be identified where the project would have a significant impact. Caltrans considers the following to be significant impacts:
- Off-ramps with vehicle queues that extend into the ramp's deceleration area or onto the freeway.
- Vehicle queues at intersections that exceed existing lane storage.
- Project traffic impacts that cause any ramp's merge/(diverge Level of Service (LOS) to be worse than the freeway's LOS.
- Project impacts that cause the freeway or intersection LOS to deteriorate beyond LOS E for freeway and LOS D for highway and intersections. If the LOS is already “E” or “F”, then a quantitative measure of increased queue lengths and delay should be used to determine appropriate mitigation measures.

Possible mitigation measures to consider include:

- Widening interchange ramps to increase capacity.
- Modifying ramp terminal intersections.
- Adding auxiliary lanes between interchanges.
- Increasing the ramp acceleration or deceleration lane length to improve merge/diverge operations.
- Adding signalization and ramp intersection geometric improvements at impacted interchanges.

• The analysis of future traffic impacts should be based on a 20 year planning horizon.

• Future transportation systems assumed for cumulative conditions should only include those improvements that are included in the most recent approved Sacramento Area Council of Governments Regional Transportation Plan.

• Our previous letter dated October 25, 2000 (copy enclosed), with comments regarding the Union Pacific Railroad remain unchanged.

• Any work conducted within the State right of way will require an encroachment permit. For permit assistance, please contact Bruce Capaul at (530) 741-4408.

If you have any questions regarding these comments, please contact Rebecca Covington at (916) 322-0579.

Sincerely,

JEFFREY PULVERMAN, Chief
Office of Regional Planning
October 25, 2000

LYOL042
03-YOL-113 PM 0.420
UC Davis Conference Center and Hotel,
and University Relations Building
Mitigated Negative Declaration
SCH# 2000092072

Mr. Sid England
University of California, Planning and Budget Office
376 Mrak Hall
One Shields Avenue
Davis, CA 95616

Dear Mr. England,

Thank you for the opportunity to comment on the UC Davis Conference Center and Hotel, and University Relations Building Mitigated Negative Declaration.

We have the following comments:

- The Union Pacific Railroad (UPRR) has historically expressed desires to retain sufficient right-of-way for additional trackage. The most feasible placement for such additional trackage would be on the north side of the existing two tracks. Discussions with UPRR should take place well before the site plan is finalized so as to ensure that there are no conflicts between the site plan and future UPRR plans. Any plans regarding a wall or fence should be discussed with UPRR. Since UPRR right-of-way has been only approximately determined and the proposed realignment of Old Davis Road is to be 10 feet away, coordination with UPRR is critical.

- Sound attenuation for transportation is the responsibility of UC Davis. Interstate 80 (I-80) traffic, passenger rail service and freight trainsets can all be expected to increase, changing noise measurements and resulting calculations. If soundwalls are to be considered, their design and placement should be discussed with UPRR.

- While total trip generation incremental volumes are provided on pages 56 and 57, resulting intersection operating conditions in Appendix A are provided only in terms of seconds of delay. Please provide us with traffic volume data (existing and with project) for the I-80/Old Davis Road eastbound and westbound ramp intersections for our review. As with the included traffic data, these volumes should be provided for both non-event and event conditions.
Mr. Sid England  
October 25, 2000  
Page 2

Please provide our office with any further actions regarding this project. If you have any questions regarding these comments, please contact Ronald Hall, Local Development Review Coordinator, at (916)323-3728.

Sincerely,

JEFFREY PULVERMAN, Chief  
Office of Regional Planning
GUIDE FOR THE PREPARATION

OF

TRAFFIC IMPACT STUDIES

STATE OF CALIFORNIA
DEPARTMENT OF TRANSPORTATION

June 2001
PREFACE

The California Department of Transportation (Caltrans) has developed this "Guide for the Preparation of Traffic Impact Studies" in response to a survey of cities and counties in California. The purpose of that survey was to improve the Caltrans local development review process (also known as the Intergovernmental Review/California Environmental Quality Act or IGR/CEQA process). The survey indicated that approximately 30 percent of the respondents were not aware of what Caltrans required in a traffic impact study (TIS).

In the early 1990s, the Caltrans District 6 office located in Fresno identified a need to provide better quality and consistency in the analysis of traffic impacts generated by local development and land use change proposals that affect State highway facilities. At that time, District 6 brought together both public and private sector expertise to develop a traffic impact study guide. The District 6 guide has proven to be successful at promoting consistency and uniformity in the identification and analysis of traffic impacts generated by local development and land use changes.

The guide developed in Fresno was adapted for statewide use by a team of Headquarters and district staff. The guide will provide consistent guidance for Caltrans staff who review local development and land use change proposals as well as inform local agencies of the information needed for Caltrans to analyze the traffic impacts to State highway facilities. The guide will also benefit local agencies and the development community by providing more expeditious review of local development proposals.

Even though sound planning and engineering practices were used to adapt the Fresno TIS guide, it is anticipated that changes will occur over time as new technologies and more efficient practices become available. To facilitate these changes, Caltrans encourages all those who use this guide to contact their nearest district office (i.e., IGR/CEQA Coordinator) to coordinate any changes with the development team.

ACKNOWLEDGEMENTS

The District 6 traffic impact study guide provided the impetus and a starting point for developing the statewide guide. Special thanks is given to Marc Birnbaum for recognizing the need for a TIS guide and for his valued experience and vast knowledge of land use planning to significantly enhance the effort to adapt the District 6 guide for statewide use. Randy Treece from District 6 provided many hours of coordination, research and development of the original guide and should be commended for his diligent efforts. Sharri Bender Ehlert of District 6 provided much of the technical expertise in the adaptation of the District 6 guide and her efforts are greatly appreciated.

A special thanks is also given to all those Cities, Counties, Regional Agencies, Congestion Management Agencies, Consultants, and Caltrans Employees who reviewed the guide and provided input during the development of this Guide for the Preparation of Traffic Impact Studies.
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Appendix "A" Minimum Contents of Traffic Impact Study
Appendix "B" Methodology for Calculating Equitable Mitigation Measures
Appendix "C" Measures of Effectiveness by Facility Type
I. INTRODUCTION

Caltrans desires to provide a safe and efficient State transportation system for the citizens of California pursuant to various Sections of the California Streets and Highway Code. This is done in partnership with local and regional agencies through procedures established by the California Environmental Quality Act (CEQA) and other land use planning processes. The intent of this guide is to provide a starting point and a consistent basis in which Caltrans evaluates traffic impacts to State highway facilities. The applicability of this guide for local streets and roads (non-State highways) is at the discretion of the affected jurisdiction.

Caltrans reviews federal, State, and local agency development projects, and land use change proposals for their potential impact to State highway facilities. The primary objectives of this guide is to provide:

- guidance in determining if and when a traffic impact study (TIS) is needed,
- consistency and uniformity in the identification of traffic impacts generated by local land use proposals,
- consistency and equity in the identification of measures to mitigate the traffic impacts generated by land use proposals,
- lead agency officials with the information necessary to make informed decisions regarding the existing and proposed transportation infrastructure (see Appendix A, Minimum Contents of a TIS)
- TIS requirements early in the planning phase of a project (i.e., initial study, notice of preparation, or earlier) to eliminate potential delays later,
- a quality TIS by agreeing to the assumptions, data requirements, study scenarios, and analysis methodologies prior to beginning the TIS, and
- early coordination during the planning phases of a project to reduce the time and cost of preparing a TIS.

II. WHEN A TRAFFIC IMPACT STUDY IS NEEDED

The level of service (LOS) for operating State highway facilities is based upon measures of effectiveness (MOEs). These MOEs (see Appendix “C-2”) describe the measures best suited for analyzing State highway facilities (i.e., freeway segments, signalized intersections, on- or off-ramps, etc.). Caltrans endeavors to maintain a target LOS at the transition between LOS “C” and LOS “D” (see Appendix “C-3”) on State highway facilities, however, Caltrans acknowledges that this may not always be feasible and recommends that the lead agency consult with Caltrans to determine the appropriate target LOS. If an existing State highway facility is operating at less than the appropriate target LOS, the existing MOE should be maintained.

---

1 "Project" refers to activities directly undertaken by government, financed by government, or requiring a permit or other approval from government as defined in Section 21065 of the Public Resources Code and Section 15378 of the California Code of Regulations.

2 "Lead Agency" refers to the public agency that has the principal responsibility for carrying out or approving a project. Defined in Section 21165 of the Public Resources Code, the "California Environmental Quality Act, and Section 15367 of the California Code of Regulations.

A. Trip Generation Thresholds

The following criterion is a starting point in determining when a TIS is needed. When a project:

1. Generates over 100 peak hour trips assigned to a State highway facility
2. Generates 50 to 100 peak hour trips assigned to a State highway facility – and, affected State highway facilities are experiencing noticeable delay; approaching unstable traffic flow conditions (LOS “C” or “D”).
3. Generates 1 to 49 peak hour trips assigned to a State highway facility – the following are examples that may require a full TIS or some lesser analysis:
   a. Affected State highway facilities experiencing significant delay; unstable or forced traffic flow conditions (LOS “E” or “F”).
   b. The potential risk for a traffic incident is significantly increased (i.e., congestion related collisions, non-standard sight distance considerations, increase in traffic conflict points, etc.).
   c. Change in local circulation networks that impact a State highway facility (i.e., direct access to State highway facility, a non-standard highway geometric design, etc.).

Note: A traffic study may be as simple as providing a traffic count to as complex as a microscopic simulation. The appropriate level of study is determined by the particulars of a project, the prevailing highway conditions, and the forecasted traffic.

B. Exceptions

Exceptions require consultation between the lead agency, Caltrans, and those preparing the TIS. When a project’s traffic impact to a State highway facility can clearly be anticipated without a study and all the parties involved (lead agency, developer, and the Caltrans district office) are able to negotiate appropriate mitigation, a TIS may not be necessary.

C. Updating An Existing Traffic Impact Study

A TIS requires updating when the amount or character of traffic is significantly different from an earlier study. Generally a TIS requires updating every two years. A TIS may require updating sooner in rapidly developing areas and not as often in slower developing areas. In these cases, consultation with Caltrans is strongly recommended.

III. SCOPE OF TRAFFIC IMPACT STUDY

Consultation between the lead agency, Caltrans, and those preparing the TIS is recommended before commencing work on the study to establish the appropriate scope. At a minimum, the TIS should include the following:

A. Boundaries of the Traffic Impact Study

All State highway facilities impacted in accordance with the criteria in Section II should be studied. Traffic impacts to local streets and roads can impact intersections with State highway facilities. In these cases, the TIS should include an analysis of adjacent local facilities, upstream and downstream, of the intersection (i.e., driveways, intersections, and interchanges) with the State highway.

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4 A "lesser analysis" may include obtaining traffic counts, preparing signal warrants, or a focused TIS, etc.
B. Traffic Analysis Scenarios

Caltrans is interested in the effects of general plan updates and amendments as well as the effects of specific project entitlements (i.e., site plans, conditional use permits, subdivisions, rezoning, etc.) that have the potential to impact a State highway facility. The complexity or magnitude of the impacts of a project will normally dictate the scenarios necessary to analyze the project. Consultation between the lead agency, Caltrans, and those preparing the TIS is recommended to determine the appropriate scenarios for the analysis. The following scenarios should be addressed in the TIS when appropriate:

1. When only a general plan amendment or update is being sought, the following scenarios are required:
   a) Existing Conditions - Current year traffic volumes and peak hour LOS analysis of effected State highway facilities.
   b) Proposed Project Only with Select Link\(^5\) Analysis - Trip generation and assignment for build-out of general plan.
   c) General Plan Build-out Only - Trip assignment and peak hour LOS analysis. Include current land uses and other pending general plan amendments.
   d) General Plan Build-out Plus Proposed Project - Trip assignment and peak hour LOS analysis. Include proposed project and other pending general plan amendments.

2. When a general plan amendment is not proposed and a proposed project is seeking specific entitlements (i.e., site plans, conditional use permits, sub-division, rezoning, etc.), the following scenarios must be analyzed in the TIS:
   a) Existing Conditions - Current year traffic volumes and peak hour LOS analysis of effected State highway facilities.
   b) Proposed Project Only - Trip generation, distribution, and assignment in the year the project is anticipated to complete construction.
   c) Cumulative Conditions (Existing Conditions Plus Other Approved and Pending Projects Without Proposed Project) - Trip assignment and peak hour LOS analysis in the year the project is anticipated to complete construction.
   d) Cumulative Conditions Plus Proposed Project (Existing Conditions Plus Other Approved and Pending Projects Plus Proposed Project) - Trip assignment and peak hour LOS analysis in the year the project is anticipated to complete construction.
   e) Cumulative Conditions Plus Proposed Phases (Interim Years) - Trip assignment and peak hour LOS analysis in the years the project phases are anticipated to complete construction.

3. In cases where the circulation element of the general plan is not consistent with the land use element or the general plan is outdated and not representative of current or future forecasted conditions, all scenarios from Sections III. B. 1. and 2. should be utilized with the exception of duplicating of item 2.a.

\(^5\) "Select link" analysis represents a project only traffic model run, where the project's trips are distributed and assigned along a loaded highway network. This procedure isolates the specific impact on the State highway network.
IV. TRAFFIC DATA

Prior to any fieldwork, consultation between the lead agency, Caltrans, and those preparing the
TIS is recommended to reach consensus on the data and assumptions necessary for the study.
The following elements are a starting point in that consideration.

A. Trip Generation

The latest edition of the Institute of Transportation Engineers’ (ITE) TRIP GENERATION
report should be used for trip generation forecasts. Local trip generation rates are also
acceptable if appropriate validation is provided to support them.

1. Trip Generation Rates – When the land use has a limited number of studies to support
the trip generation rates or when the Coefficient of Determination ($R^2$) is below 0.75,
consultation between the lead agency, Caltrans and those preparing the TIS is
recommended.

2. Pass-by Trips6 – Pass-by trips are only considered for retail oriented development.
Reductions greater than 15% requires consultation and acceptance by Caltrans. The
justification for exceeding a 15% reduction should be discussed in the TIS.

3. Captured Trips7 – Captured trip reductions greater than 5% requires consultation and
acceptance by Caltrans. The justification for exceeding a 5% reduction should be
discussed in the TIS.

4. Transportation Demand Management (TDM) – Consultation between the lead agency
and Caltrans is essential before applying trip reduction for TDM strategies.

NOTE: Reasonable reductions to trip generation rates are considered when adjacent State
highway volumes are sufficient (at least 5000 ADT) to support reductions for the land use.

B. Traffic Counts

Prior to field traffic counts, consultation between the lead agency, Caltrans and those
preparing the TIS is recommended to determine the level of detail (e.g., location, signal
timing, travel speeds, turning movements, etc.) required at each traffic count site. All State
highway facilities within the boundaries of the TIS should be considered. Common rules for
counting vehicular traffic include but are not limited to:

1. Vehicle counts should be conducted on Tuesdays, Wednesdays, or Thursdays during
weeks not containing a holiday and conducted in favorable weather conditions.

2. Vehicle counts should be conducted during the appropriate peak hours (see peak
hour discussion below).

3. Seasonal and weekend variations in traffic should also be considered where
appropriate (i.e., recreational routes, tourist attractions, harvest season, etc.).

C. Peak Hours

To eliminate unnecessary analysis, consultation between the lead agency, Caltrans and those
preparing the TIS is recommended during the early planning stages of a project. In general,
the TIS should include a morning (a.m.) and an evening (p.m.) peak hour analyses. Other
peak hours (e.g., 11:30 a.m. to 1:30 p.m., weekend, holidays, etc.) may also be required to
determine the significance of the traffic impacts generated by a project.

6“Pass-by” trips are made as intermediate stops between an origin and a primary trip destination (i.e., home to work, home to
shopping, etc.).

7“Captured Trips” are trips that do not enter or leave the driveways of a project’s boundary within a mixed-use development.
D. Travel Forecasting (Transportation Modeling)

The local or regional traffic model should reflect the most current land use and planned improvements (i.e., where programming or funding is secured). When a general plan build-out model is not available, the closest forecast model year to build-out should be used. If a traffic model is not available, historical growth rates and current trends can be used to project future traffic volumes. The TIS should clearly describe any changes made in the model to accommodate the analysis of a proposed project.

V. TRAFFIC IMPACT ANALYSIS METHODOLOGIES

Typically, the traffic analysis methodologies for the facility types indicated below are used by Caltrans and will be accepted without prior consultation. When a State highway has saturated flows, the use of a micro-simulation model is encouraged for the analysis. Other analysis methods may be accepted, however, consultation between the lead agency, Caltrans and those preparing the TIS is recommended to agree on the data necessary for the analysis.

A. Freeway Segments – Highway Capacity Manual (HCM)*, operational analysis
B. Weaving Areas – Caltrans Highway Design Manual (HDM)
C. Ramps and Ramp Junctions – HCM*, operational analysis or Caltrans HDM, Caltrans Ramp Metering Guidelines (most recent edition)
D. Multi-Lane Highways – HCM*, operational analysis
E. Two-lane Highways – HCM*, operational analysis
F. Signalized Intersections* – HCM*, Highway Capacity Software**, operational analysis, TRAFFIX***, Synchro**, see footnote 8
G. Unsignalized Intersections – HCM*, operational analysis, Caltrans Traffic Manual for signal warrants if a signal is being considered
H. Transit – HCM*, operational analysis
I. Pedestrians – HCM*
J. Bicycles – HCM*
K. Caltrans Criteria/Warrants – Caltrans Traffic Manual (stop signs, traffic signals, freeway lighting, conventional highway lighting, school crossings)
L. Channelization – Caltrans guidelines for Reconstruction of Intersections, August 1985, Ichiro Fukutome

*The most current edition of the Highway Capacity Manual, Transportation Research Board, National Research Council, should be used.

**NOTE: Caltrans does not officially advocate the use of any special software. However, consistency with the HCM is advocated in most but not all cases. The Caltrans local development review units utilize the software mentioned above. If different software or analytical techniques are used for the TIS then consultation between the lead agency, Caltrans and those preparing the TIS is recommended. Results that are significantly different than those produced with the analytical techniques above should be challenged.

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8 The procedures in the Highway Capacity Manual "do not explicitly address operations of closely spaced signalized intersections. Under such conditions, several unique characteristics must be considered, including spill-back potential from the downstream intersection to the upstream intersection, effects of downstream queues on upstream saturation flow rate, and unusual platoon dispersion or compression between intersections. An example of such closely spaced operations is signalized ramp terminals at urban interchanges. Queue interactions between closely spaced intersections may seriously distort the procedures in" the HCM.
VI. MITIGATION MEASURES

The TIS should provide the nexus [Nollan v. California Coastal Commission, 1987, 483 U.S. 825 (108 S.Ct. 314)] between a project and the traffic impacts to State highway facilities. The TIS should also establish the rough proportionality [Dolan v. City of Tigard, 1994, 512 U.S. 374 (114 S. Ct. 2309)] between the mitigation measures and the traffic impacts. One method for establishing the rough proportionality or a project proponent's equitable responsibility for a project's impacts is provided in Appendix "B." Consultation between the lead agency, Caltrans and those preparing the TIS is recommended to reach consensus on the mitigation measures and who will be responsible.

Mitigation measures must be included in the traffic impact analysis. This determines if a project's impacts can be eliminated or reduced to a level of insignificance. Eliminating or reducing impacts to a level of insignificance is the standard pursuant to CEQA and the National Environmental Policy Act (NEPA). The lead agency is responsible for administering the CEQA review process and has the principal authority for approving a local development proposal or land use change. Caltrans, as a responsible agency, is responsible for reviewing the TIS for errors and omissions that pertain to State highway facilities. However, the authority vested in the lead agency under CEQA does not take precedence over other authorities in law.

If the mitigation measures require work in the State highway right-of-way an encroachment permit from Caltrans will be required. This work will also be subject to Caltrans standards and specifications. Consultation between the lead agency, Caltrans and those preparing the TIS early in the planning process is strongly recommended to expedite the review of local development proposals and to reduce conflicts and misunderstandings in both the local agency CEQA review process as well as the Caltrans encroachment permit process.
APPENDIX “A”

MINIMUM CONTENTS

OF A

TRAFFIC IMPACT STUDY
MINIMUM CONTENTS OF TRAFFIC IMPACT STUDY REPORT

I. EXECUTIVE SUMMARY

II. TABLE OF CONTENTS
   A. List of Figures (Maps)
   B. List of Tables

III. INTRODUCTION
   A. Description of the proposed project
   B. Location of project
   C. Site plan including all access to State highways (site plan, map)
   D. Circulation network including all access to State highways (vicinity map)
   E. Land use and zoning
   F. Phasing plan including proposed dates of project (phase) completion
   G. Project sponsor and contact person(s)
   H. References to other traffic impact studies

IV. TRAFFIC ANALYSIS
   A. Clearly stated assumptions
   B. Existing and projected traffic volumes (including turning movements), facility geometry
      (including storage lengths), and traffic controls (including signal phasing and multi-
      signal progression where appropriate) (figure)
   C. Project trip generation including references (table)
   D. Project generated trip distribution and assignment (figure)
   E. LOS and warrant analyses - existing conditions, cumulative conditions, and full build of
      general plan conditions with and without project

V. CONCLUSIONS AND RECOMMENDATIONS
   A. LOS and appropriate MOE quantities of impacted facilities with and without mitigation
      measures
   B. Mitigation phasing plan including dates of proposed mitigation measures
   C. Define responsibilities for implementing mitigation measures
   D. Cost estimates for mitigation measures and financing plan

VI. APPENDICES
   A. Description of traffic data and how data was collected
   B. Description of methodologies and assumptions used in analyses
   C. Worksheets used in analyses (i.e., signal warrant, LOS, traffic count information, etc.)
APPENDIX "B"

METHODOLOGY FOR

CALCULATING EQUITABLE

MITIGATION MEASURES
METHOD FOR CALCULATING EQUITABLE MITIGATION MEASURES

The methodology below is neither intended as, nor does it establish, a legal standard for determining equitable responsibility and cost of a project’s traffic impact, the intent is to provide:

1. A starting point for early discussions to address traffic mitigation equitably.
2. A means for calculating the equitable share for mitigating traffic impacts.

The formulas should be used when:
- A project has impacts that do not immediately warrant mitigation, but their cumulative effects are significant and will require mitigating in the future.
- A project has an immediate impact and the lead agency has assumed responsibility for addressing operational improvements

NOTE: This formula is not intended for circumstances where a project proponent will be receiving a substantial benefit from the identified mitigation measures. In these cases, (e.g., mid-block access and signalization to a shopping center) the project should take full responsibility to toward providing the necessary infrastructure.

**EQUITABLE SHARE RESPONSIBILITY:** Equation C-1

NOTE: \( T_E < T_B \), see explanation for \( T_B \) below.

\[
P = \frac{T}{T_B - T_E}
\]

Where:
- \( P \) = The equitable share for the proposed project's traffic impact.
- \( T \) = The vehicle trips generated by the project during the peak hour of adjacent State highway facility in vehicles per hour, vph.
- \( T_B \) = The forecasted traffic volume on an impacted State highway facility at the time of general plan build-out (e.g., 20 year model or the furthest future model date feasible), vph.
- \( T_E \) = The traffic volume existing on the impacted State highway facility plus other approved projects that will generate traffic that has yet to be constructed/opened, vph.

**EQUITABLE COST:** Equation C-2

\[
C = P \cdot \left( C_T \right)
\]

Where:
- \( C \) = The equitable cost of traffic mitigation for the proposed project, ($) (Rounded to nearest one thousand dollars)
- \( P \) = The equitable share for the project being considered.
- \( C_T \) = The total cost estimate for improvements necessary to mitigate the forecasted traffic demand on the impacted State highway facility in question at general plan build-out, ($).

**NOTES**

1. Once the equitable share responsibility and equitable cost has been established on a per trip basis, these values can be utilized for all projects on that State highway facility until the forecasted general plan build-out model is revised.
2. Truck traffic should be converted to passenger car equivalents before utilizing these equations (see the Highway Capacity Manual for converting to passenger car equivalents).
APPENDIX "C"

MEASURES OF EFFECTIVENESS

BY

FACILITY TYPE
### MEASURES OF EFFECTIVENESS BY FACILITY TYPE

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<tr>
<th>TYPE OF FACILITY</th>
<th>MEASURE OF EFFECTIVENESS (MOE)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Basic Freeway Segments</td>
<td>Density (pc/mi/ln)</td>
</tr>
<tr>
<td>Ramps</td>
<td>Density (pc/mi/ln)</td>
</tr>
<tr>
<td>Ramp Terminals</td>
<td>Delay (sec/veh)</td>
</tr>
<tr>
<td>Multi-Lane Highways</td>
<td>Density (pc/mi/ln)</td>
</tr>
<tr>
<td>Two-Lane Highways</td>
<td>Percent-Time-Following</td>
</tr>
<tr>
<td></td>
<td>Average Travel Speed (mi/hr)</td>
</tr>
<tr>
<td>Signalized Intersections</td>
<td>Control Delay per Vehicle (sec/veh)</td>
</tr>
<tr>
<td>Unsignalized Intersections</td>
<td>Average Control Delay per Vehicle (sec/veh)</td>
</tr>
<tr>
<td>Urban Streets</td>
<td>Average Travel Speed (mi/hr)</td>
</tr>
</tbody>
</table>

Measures of effectiveness for level of service definitions located in the most recent version of the Highway Capacity Manual, Transportation Research Board, National Research Council.
Transition between LOS "C" and LOS "D" Criteria
(Reference Highway Capacity Manual)

BASIC FREEWAY SEGMENTS @ 65 mi/hr

<table>
<thead>
<tr>
<th>LOS</th>
<th>Maximum Density (pc/mi/ln)</th>
<th>Minimum Speed (mph)</th>
<th>Maximum v/c</th>
<th>Maximum Service Flow Rate (pc/hr/ln)</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>11</td>
<td>65.0</td>
<td>0.30</td>
<td>710</td>
</tr>
<tr>
<td>B</td>
<td>18</td>
<td>65.0</td>
<td>0.50</td>
<td>1170</td>
</tr>
<tr>
<td>C</td>
<td>26</td>
<td>64.6</td>
<td>0.71</td>
<td>1680</td>
</tr>
<tr>
<td>D</td>
<td>35</td>
<td>59.7</td>
<td>0.89</td>
<td>2090</td>
</tr>
<tr>
<td>E</td>
<td>45</td>
<td>52.2</td>
<td>1.00</td>
<td>2350</td>
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</table>

SIGNALIZED INTERSECTIONS and RAMP TERMINALS

<table>
<thead>
<tr>
<th>LOS</th>
<th>Control Delay per Vehicle (sec/veh)</th>
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<tbody>
<tr>
<td>A</td>
<td>( \leq 10 )</td>
</tr>
<tr>
<td>B</td>
<td>( &gt; 10 - 20 )</td>
</tr>
<tr>
<td>C</td>
<td>( &gt; 20 - 35 )</td>
</tr>
<tr>
<td>D</td>
<td>( &gt; 35 - 55 )</td>
</tr>
<tr>
<td>E</td>
<td>( &gt; 55 - 80 )</td>
</tr>
<tr>
<td>F</td>
<td>( &gt; 80 )</td>
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</table>

MULTI-LANE HIGHWAYS @ 55 mi/hr

<table>
<thead>
<tr>
<th>LOS</th>
<th>Maximum Density (pc/mi/ln)</th>
<th>Minimum Speed (mph)</th>
<th>Maximum v/c</th>
<th>Maximum Service Flow Rate (pc/hr/ln)</th>
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<tr>
<td>A</td>
<td>11</td>
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<td>B</td>
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<td>990</td>
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<tr>
<td>C</td>
<td>26</td>
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<td>0.68</td>
<td>1430</td>
</tr>
<tr>
<td>D</td>
<td>35</td>
<td>52.9</td>
<td>0.88</td>
<td>1850</td>
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<tr>
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<td>41</td>
<td>51.2</td>
<td>1.00</td>
<td>2100</td>
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Dotted line represents the transition between LOS "C" and LOS "D"
### TWO-LANE HIGHWAYS

<table>
<thead>
<tr>
<th>LOS</th>
<th>Percent Time-Spent-Following</th>
<th>Average Travel Speed (mi/hr)</th>
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<tbody>
<tr>
<td>A</td>
<td>≤ 35</td>
<td>&gt; 55</td>
</tr>
<tr>
<td>B</td>
<td>&gt; 35 - 50</td>
<td>&gt; 50 - 55</td>
</tr>
<tr>
<td>C</td>
<td>&gt; 50 - 65</td>
<td>&gt; 45 - 55</td>
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<tr>
<td>D</td>
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<td>&gt; 40 - 45</td>
</tr>
<tr>
<td>E</td>
<td>&gt; 80</td>
<td>≤ 40</td>
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### URBAN STREETS

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<th>Urban Street Class</th>
<th>I</th>
<th>II</th>
<th>III</th>
<th>IV</th>
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<tbody>
<tr>
<td>Range of FFS</td>
<td>55 to 45 mi/hr</td>
<td>45 to 35 mi/hr</td>
<td>35 to 30 mi/hr</td>
<td>35 to 25 mi/hr</td>
</tr>
<tr>
<td>Typical FFS</td>
<td>50 mi/hr</td>
<td>40 mi/hr</td>
<td>35 mi/hr</td>
<td>30 mi/hr</td>
</tr>
<tr>
<td>LOS</td>
<td>Average Travel Speed (mi/hr)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>A</td>
<td>&gt; 42</td>
<td>&gt; 35</td>
<td>&gt; 30</td>
<td>&gt; 25</td>
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<tr>
<td>B</td>
<td>&gt; 34 - 42</td>
<td>&gt; 28 - 35</td>
<td>&gt; 24 - 30</td>
<td>&gt; 19 - 25</td>
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<tr>
<td>C</td>
<td>&gt; 27 - 34</td>
<td>&gt; 22 - 28</td>
<td>&gt; 18 - 24</td>
<td>&gt; 13 - 19</td>
</tr>
<tr>
<td>D</td>
<td>&gt; 21 - 27</td>
<td>&gt; 17 - 22</td>
<td>&gt; 14 - 18</td>
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</tr>
<tr>
<td>E</td>
<td>&gt; 16 - 21</td>
<td>&gt; 13 - 17</td>
<td>&gt; 10 - 14</td>
<td>&gt; 7 - 9</td>
</tr>
<tr>
<td>F</td>
<td>≤ 16</td>
<td>≤ 13</td>
<td>≤ 10</td>
<td>≤ 7</td>
</tr>
</tbody>
</table>

Dotted line represents the transition between LOS "C" and LOS "D"
GRAY DAVIS
Governor

MARIA CONTRERAS-SWEET
Secretary
Business, Transportation and Housing Agency

JEFF MORALES
Director
California Department of Transportation

RANDELL H. IWASAKI
Deputy Director
Maintenance and Operations

JOSEPH HECKER
Chief
Division of Traffic Operations

For additional copies of these guidelines, please contact Tom Persons @ email:
Thomas.Persons@dot.ca.gov
LETTER 1: Jeffrey Pulverman, State of California Department of Transportation, District 3 (September 18, 2001)

Response to Comment 1-1

Section 4.3-1 in this DEIR discusses transportation and circulation impacts. Project-specific and cumulative increases in traffic volumes in relationship to the capacity of the future transportation are discussed in Impacts 4.3-1, 4.3-3 and 4.3-4. The data, methodology, and conclusions regarding project-specific and cumulative transportation and circulation effects of the proposed project are detailed in Appendix F, Transportation and Circulation Analysis, UC Davis Conference Center and Hotel and Graduate School of Management Building. This study conforms to the recommendations outlined by the commenter for transportation impact studies and includes the collection of new traffic volume data, the estimation of the traffic characteristics associated with the project for both “event” and “non-event” conditions, calculation of both existing and cumulative plus project traffic volumes, analysis of roadway operating conditions, analysis of freeway operating conditions for a 20-year time horizon, comparison to standards of significance, and development of mitigation measures (as appropriate).

Response to Comment 1-2

The cumulative future traffic impacts at the I-80/Old Davis Road interchange were evaluated using regional forecasts for the year 2022 developed by the Sacramento Area Council of Governments (SACOG). Traffic impacts at the interchanges are discussed in Section 4.3, Transportation and Circulation, of this DEIR.

Response to Comment 1-3

Cumulative increases in traffic volumes in relationship to the capacity of the future transportation are discussed in Impacts 4.3-3 and 4.3-4 of the DEIR. The data, methodology, and conclusions regarding project-specific and cumulative transportation and circulation effects of the proposed project presented in this section are detailed in Appendix F. Future improvements assumed in the cumulative analysis were based on the most recent SACOG Regional Transportation Plan.

Response to Comment 1-4

Please see Responses to Comments 1-6 and 1-7 regarding the location of UPRR tracks relative to the project site.

Response to Comment 1-5

The proposed project would not include any work within the state right-of-way. 1994 LRDP EIR Mitigation Measure 4.3-1(b), which recommends modifications to the Richards Boulevard and I-80 eastbound ramp, is outside the jurisdiction of the University to implement. However, the campus assumes that, if implemented, these measures would comply with Caltrans encroachment permit requirements.
Response to Comment 1-6

The commenter expresses concern about potential right-of-way encroachments on UPRR facilities related to the realignment of Old Davis Road. Realignment of Old Davis Road in the vicinity of the project site was approved as part of the Center for the Arts Performance Hall and South Entry Roadway and Parking Improvements project and is currently under construction.

The southern boundary of the proposed project site is located approximately 90 feet north of the existing UPRR tracks. UPRR does not have any current plans to acquire more right of way in the area of the proposed project.¹ No walls, fences, or other development would be constructed as part of the proposed project or as part of the previously approved realignment of Old Davis Road that would encroach on existing or future UPRR right-of-way.

Response to Comment 1-7

Potential effects of off-site source of noise, including trains, are discussed on page 68 in the Initial Study (Appendix A in this DEIR). The project would include features to reduce interior sound levels, if appropriate. Soundwalls are not proposed as part of the project.

Response to Comment 1-8

Please see Response to Comments 1-1 through 1-3.

September 14, 2001

Mr. A. Sydney England
Office of Resource Management and Planning
376 Mrak Hall
University of California
One Shields Avenue
Davis, CA 95616

Dear Mr. England:

UC DAVIS CONFERENCE CENTER, HOTEL, AND GRADUATE SCHOOL OF MANAGEMENT

Thank you for including the California Department of Transportation in the environmental review process for the above-referenced project. We have reviewed the Initial Study, dated August 17, 2001, and we are satisfied that the proposed activities will not significantly impact the State highway system in Solano County.

Should you require further information or have any questions regarding this letter, please call Rick Kuo, of my staff at (510) 286-5988.

Sincerely,

HARRY Y. YAHATA
District Director

By

JEAN C. R. FINNEY
District Branch Chief
IGR/CEQA

c: Katie Shulte Joung (State Clearing House)
LETTER 1.2-1: Harry Y. Yahata, State of California Department of Transportation,  
(September 14, 2001)

Response to Comment 1.2-1

Comment noted. The commenter indicates Caltrans (Oakland office) has concluded the proposed project would not significantly affect the State highway system in Solano County.
6 September 2001

Sid Meyer
University of California, Davis
Office of Resource Management and Planning
One Shields Avenue
Davis, California 95616

PROPOSED PROJECT REVIEW, CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA), INITIAL STUDY FOR THE UC DAVIS CONFERENCE CENTER, HOTEL AND GRADUATE SCHOOL OF MANAGEMENT BUILDING PROJECT, DAVIS, YOLO COUNTY, STATE CLEARINGHOUSE #2001082067

We have reviewed the Initial Study for the Conference Center, Hotel, and Graduate School of Management Building project. Based on our review, we have the following comments regarding the proposed project.

Storm Water

A Construction Activities Storm Water General Permit is required for storm water discharges associated with construction activity involving clearing, grading, and excavation that results in land disturbance of five or more acres. Storm water discharges from construction activity that results in land disturbance of less than five acres, but part of a Larger Common Plan of Development or Sale also require a permit.

On 10 July 2001, the Regional Board began consideration of University of California, Davis Campus (University) as a Larger Common Plan of Development or Sale. Therefore, the University must submit a New Construction Project Information Form to the address above for every construction project occurring on campus involving clearing, grading, and excavation that results in land disturbance.

The University must also develop a Storm Water Pollution Prevention Plan. This plan includes site-specific Best Management Practices that prevent soil erosion, control sediment, and eliminate all construction pollutants from moving off the proposed Conference Center, Hotel, and Graduate School of Management Building construction site and into receiving waters.

California Environmental Protection Agency

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at http://www.swrcb.ca.gov/rwqcb5
Dewatering Permit

The University may be required to file a Dewatering Permit covered under Waste Discharge Requirements General Order for Dewatering and Other Low Threat Discharges to Surface Waters Permit, Order No. 5-00-175 (NPDES CAG995001) provided the discharge does not contain significant quantities of pollutants and are either (1) four months or less in duration, or (2) the average dry weather discharge does not exceed 0.25 mgd:

a. Well development water  
b. Construction dewatering  
c. Pump/well testing  
d. Pipeline/tank pressure testing  
e. Pipeline/tank flushing or dewatering  
f. Condensate discharges  
g. Water Supply system discharges  
h. Miscellaneous dewatering/low threat discharges

If you have any questions regarding these comments please contact me at (916) 255-3063 or George D. Day, Senior Water Resources Control Engineer, Storm Water and Water Quality Certification Unit at (916) 255-3506.

CHRISTINE PALISOC  
Environmental Scientist  
Storm Water Unit

cc: Mr. Carl Foreman, University of California, Davis, Environmental Health and Safety, Davis  
Mr. Brian Oatman, University of California, Davis, Environmental Health and Safety, Davis  
Mr. Lee Tolentino, University of California, Davis, Architects and Engineers, Davis  
Mr. Thomas To, Yolo County Environmental Health, Woodland  
Ms. Katie Schulte Joung, State Clearinghouse, Sacramento
LETTER 2: Christine Palisoc, California Regional Water Quality Control Board Central Valley Region, Storm Water Unit (September 6, 2001)

Response to Comment 2-1

As indicated in the Hydrology and Water Quality Section (Item 9a) of the Initial Study (see Appendix A in the DEIR) construction activity associated with the proposed project would be covered under the “General Permit for Discharge of Storm Water Associated with Construction” for the entire Davis campus. In compliance with the permit, a “New Construction Project Information Form” would be submitted for the proposed project before construction begins. In addition, a “Stormwater Pollution Prevention Plan” that includes site-specific “Best Management Practices” would be prepared and implemented.

Response to Comment 2-2

Comment noted. Dewatering activities are not anticipated to occur as part of the proposed project. In addition, it is campus policy to discharge water used in pipeline testing/flushing to the campus sewer system, as opposed to the storm drainage system.
September 20, 2001

Mr. Sid England
University of California, Davis
Office of Resources Management and Planning
One Shields Avenue
Davis, CA 95616

Dear Mr. England:

The Department of Fish and Game (DFG) has reviewed the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Conference Center, Hotel, and Graduate School of Management Building project (SCH # 2001082067). The project proposes the development of the above-mentioned facilities on a five-acre site located near the south entry area of the central campus of the University of California, Davis. The project is located in the City of Davis, in Yolo County.

Wildlife habitat resources consist primarily of agricultural row crops and intensively managed tree/shrub species composing the urban landscaping of the area. Significant resources of the project include nesting/foraging habitat for the state listed threatened Swainson's hawk (Buteo swainsoni) and the burrowing owl (Athene cunicularia), a state species of special concern. The draft EIR should address the following:

1. Analyze and discuss all reasonably foreseeable direct, indirect and cumulative project-related impacts on biological resources. This analysis should focus on the presence of, and potential habitats for all state and federal listed species and species of concern and the evaluation of direct, indirect and cumulative project impacts to these species and their respective habitat. This analysis should include discussion of adjacent habitats outside the project area that support or could support listed species or species of concern and that may be impacted as a result of project implementation. Quantify and delineate these habitats in this discussion.
2. Identify and discuss potentially feasible mitigation measures to address all reasonably foreseeable project-related impacts on biological resources. Such mitigation measures should first be directed at avoidance of project-related impacts, followed by an analysis of mitigation measures that will substantially lessen such impacts, and complete the analysis, if necessary, with an evaluation of potentially feasible mitigation measures that will compensate in whole or in part for any unavoidable project-related impacts on biological resources. Specifically, identify mitigation measures that minimize and fully mitigate all project impacts to state and federal listed species. Specific project level analysis should identify both on-site mitigation achieved through project design, take avoidance measures, and any potential off-site mitigation strategies.

3. Evaluate the project's consistency with the applicable land use plans such as General Plans (specific ones), Watershed Plans, and Fish and Wildlife Biological Opinions.

4. Evaluate the project's contribution to habitat fragmentation, population isolation and issues related to connectivity of all plant and animal populations including but not limited to listed species and species of concern. Identify all feasible mitigation measures that will avoid or substantially lessen these impacts.

5. Discuss and include as mitigation some alternatives in project design that will avoid or substantially lessen project-related impacts on biological resources. Alternative designs should include avoidance of all significant habitats, listed species and species of concern should include design concepts that address habitat connectivity, habitat fragmentation and population isolation.

Because this project will have an impact to fish and/or wildlife habitat, assessment of fees under Public Resources Code Section 21089, and as defined by Fish and Game Code Section 711.4 is necessary. Fees are payable by the project applicant upon filing of the Notice of Determination by the lead agency.
Mr. Sid England  
September 20, 2001  
Page Three

Pursuant to Public Resources Code Sections 21092 and 21092.2, the DFG requests written notification of proposed actions and pending decisions regarding this project. Written notifications should be directed to this office.

Thank you for the opportunity to review this project. If the DFG can be of further assistance, please contact Mr. Craig Stowers, Associate Wildlife Biologist, at (916) 691-2122 or Ms. Terry Roscoe, Habitat Conservation Planning Supervisor, at (916) 358-2883.

Sincerely,

Larry L. Eng., Ph.D.  
Assistant Regional Manager  
Fisheries, Wildlife and Environmental Programs

cc: State Clearinghouse  
1400 Tenth Street  
Post Office Box 3044  
Sacramento, CA 95812-3044

Ms. Terry Roscoe  
Mr. Craig Stowers  
Department of Fish and Game  
1701 Nimbus Road, Suite A  
Rancho Cordova, CA 95670
LETTER 3: Larry L. Eng, State of California Department of Fish and Game, Sacramento Valley and Central Sierra Region (September 20, 2001)

Response to Comment 3-1

Biological resources on the project site are described in Section 4.5 of this DEIR and on pages 97 through 98 in the Initial Study (Appendix A in this DEIR). The project site for the proposed Conference Center, Hotel, and Graduate School of Management does not offer Swainson’s hawk foraging habitat; however, the proposed site for the relocation of Environmental Horticulture activities is currently used for row crops and contains potential Swainson’s hawk foraging habitat. Relocation of Environmental Horticulture activities would develop less than two acres on this site. As discussed in the Initial Study, no burrowing owl habitat would be affected by the proposed project at either the project site or the Environmental Horticulture relocation site.

Response to Comment 3-2

Impacts 4.5-1 and 4.5-2 in this DEIR discuss potential project-specific and cumulative effects on loss of Swainson’s hawk foraging habitat. Project-specific Mitigation Measure 4.5-1 has been identified to reduce project-specific effects to a less-than-significant level through 1:1 habitat replacement, consistent with CDFG requirements. Construction-related impacts on Swainson’s hawk were discussed in Item 8b on pages 98 through 99 in the Initial Study (Appendix A in this DEIR).

Response to Comment 3-3

According to the Department of Fish and Game, all of the agricultural lands on the campus support potential Swainson’s hawk habitat. Because the Environmental Horticulture program requires adjacent land for teaching and research fields, any other location would also involve the use of agricultural lands. If feasible, development of agricultural support structures would be located in proximity to other developed uses (other structures, roads). Please see also Response to Comment 3-2.

Response to Comment 3-4

Comment noted. Fees as required under Public Resources Code Section 21089 will be paid upon filing of the project’s Notice of Determination.
September 14, 2001

John Meyer, Vice Chancellor
Office of Resource Management and Planning
One Shields Avenue
University of California
Davis, CA 95616

Re: Draft Tiered Initial Study for the Proposed UC Davis Hotel/Conference Center and Graduate School of Management Building

Dear John:

The City of Davis recognizes the responsiveness of the University in reevaluating the proposed Hotel/Conference Center project based on the concerns expressed last fall by the City and other interested parties on the previous environmental documentation for the then 150 room Hotel/Conference Center. We note positively the reduced room hotel proposal and other changes made by the University. The City appreciates the University's commitment to add much needed conference space to the community.

The City continues to identify fundamental land use policy questions and environmental issues that remain and must be addressed in the EIR. The City questions whether a tiered focused EIR is the appropriate vehicle for addressing these issues. For reasons detailed in this letter, the City believes changing conditions warrant broader environmental review either through a full EIR prepared for the Hotel/Conference Center project or in conjunction with the environmental review for the LRPD update process that has been initiated by the University.

For the record, there has been some question on the extent of prior public discussion on this project and the level of City input or the lack thereof. Staff reviewed the available record and found little evidence of public discussion on the Hotel/Conference Center prior to circulation of last year's tiered initial study. University staff made a presentation to the City Council in May of 1999. The focus of the presentation was the proposed Performing Arts Center. Minutes from the meeting contain no references to the Hotel/Conference Center, although it is possible that there were some general references to the concept. Because the minutes contain no direct comments, it is clear that the Hotel/Conference Center was not the focus of that presentation.

The 1998 tiered initial study for the proposed center for the performing arts contains broad assumptions for the then proposed 4.6 acre proposed enterprise opportunity site east of the entry quad and Performing Arts Center. There are some general references of what could be developed, such as an academic building or a Hotel/Conference Center. However, the initial
study made it clear that any such project would require further environmental review if and when a specific project proposal came forward. When the specific project came forward last year, the City responded as appropriate under the CEQA process.

It should be noted that the City's concerns with the nature and extent of a community draining commercial activity on University lands are not new. In the late 80's, when the University was developing an earlier version of the long range development plan, 1988 correspondence from the City's Planning Commission to the University stated, "The composition, size and siting of the Hotel/Conference Center/retail/office complex and center for the arts are of particular concern to the City. The siting of these uses has the potential to strengthen the City's core if adjacent to it, but could otherwise detract from it". This comment was reinforced with the following recommendation, "Note that the City support of retail and Hotel/Conference Center development on the Aggie Village site is predicated on anticipated annexation of the site, such that sales tax and transient occupancy tax revenues would accrue to the City (as well as the County) to partially offset costs to the City".

It is somewhat ironic that we seem to be back to a similar place today—with an added twist. The Hotel/Conference Center is now proposed with significant new University growth and another LRDP update looming on the horizon. Thousands of new students, faculty and staff are being contemplated, far in excess of the current LRDP. Regardless of where these increases are accommodated (on campus, in Davis, or in surrounding communities), the impacts will be greatest on the City of Davis. So what we now face is the prospect of the University proposing a commercial activity that is documented to have draining impacts on local businesses (even with mitigation) and takes away a potential revenue generating use from the City that would help offset the impacts of new University growth. The prospect of a limited, focused EIR is not justified given the breadth of the issues now before us. Given these circumstances, the City believes the most appropriate course of action would be for the University to delay any action on the proposed Hotel/Conference Center until it can be considered in the context of the new LRDP update.

From a public information standpoint, the City believes the tiering of environmental analysis done under the 1994 LRDP is antiquated and confusing. In addition to the significant changes in circumstances since the adoption of the 1994 LRDP, we found it nearly impossible to follow the tangled web of environmental analyses and feel the new information regarding University's growth plans at minimum warrants preparation of significant new environmental analysis for the Hotel/Conference Center or any other substantive campus project that affects the City's economic base, fiscal stability and community character.

To demonstrate the confusion resulting from the previous tiering of environmental documents from the 1994 LRDP, it is unclear to if the plan objectives for the enterprise reserve designations were modified in conjunction with the 1998 amendment for the proposed performing arts center. Of particular interest is whether one of the four plan objectives pertaining to commercial uses stated on page 68 of the LRDP was amended to reflect the contemplated action. Plan objective number four states, "4. Commercial Uses. Reserve land at the east end of First Street, which has a low opportunity cost for direct campus uses, for commercial development to financially
support the academic mission". The 1998 amendment which created the "Potential Enterprise Opportunity" overlay on the site of the now proposed Hotel/Conference Center, seems inconsistent with this plan objective from the 1994 plan. The City finds no evidence that the 1998 amendment included a change in this language. The current initial study on page 31, fourth paragraph, indicates that the Hotel/Conference Center is consistent with designation as a commercial activity, based on the list of permitted uses on page 68 of the LRDP. However, City staff reviewed the list and could only find commercial uses referenced with regard to land at the east end of First Street. There is no other reference to commercial use on that page. If the 1998 amendment did not change the text of this page, there would appear to be an internal inconsistency between the text of the LRDP and the location of the subject enterprise overlay. The hotel conference center project cannot be tiered off a document that did not contemplate commercial uses at the currently proposed location. Rather, the University would need to address this issue is a broad based environmental review that looks at all aspects of the hotel-conference center in light of the currently known circumstances, rather than tiering off an out of date environmental document that no longer reflects the cumulative impacts and other impacts of the proposed project.

In addition to the above general comments, staff has the following detailed comments on the Initial Study. Comments on traffic issues are contained in Attachment 1.

- On page 2, it appears that the Initial Study is tiering from narrower environmental analysis in addition to the broader program EIR. Section 15152 of the CEQA guidelines allow tiering only from broader earlier document. As indicated earlier, this proposed tiering, given the varying levels of environmental documents that have been prepared, is confusing and lacks the appropriate progression in analysis. A full EIR is necessary to remedy current discontinuities.

- At the bottom of page 30, there is discusison that the 1994 LRDP was amended by the Center for the Arts Performance Hall and South Entry Roadway and Parking Improvements Tiered Initial Study and Mitigated Negative Declaration. This appears to be an incorrect reference since an environmental document cannot amend a plan. Was the amendment approved by the Regents or some other decision making body?

- The last paragraph on page 33 references future University growth and the need to update the LRDP. It concludes by indicting that analyzing the impacts of this growth would be too speculative at this time. The City believes that the magnitude of the projected growth is known at this time in more than sufficient detail. Growth on campus is not speculative as that term is used in CEQA. The use of the 15262 exemption is improper. It is integral to the issues the City is raising about the Hotel/Conference Center. To ignore these impacts at this time would raise issues about project segmentation, and inappropriate tiering from past documents.

- On page 41 in the discussion of land use impacts, the last sentence indicates that "the proposed project is within the scope of land use and Planning analysis presented in the prior trend documents and that there are no changed circumstances since preparation of those
documents that require reanalysis of cumulative impacts. City staff questions this conclusion given what we know about so called "Tidal Wave 2". We believe the scope of EIR should include an analysis of these impacts which are sufficiently detailed to be considered more than speculative.

- Also on page 41, the City does not agree with the conclusion of "no impact" with regard to consistency with a local general plan. The City's General Plan contains numerous policies for preserving the downtown as the community's core and center for commercial and cultural activities. The proposed Hotel/Conference Center could potentially diffuse these activities and damage the downtown vitality. This is a fundamental land use principle in the community, and any action that erodes it must be considered a significant impact.

- The last paragraph on page 42 indicates the proposed Hotel/Conference Center is consistent with the 1994 LRDP as amended. In light of our earlier comment about the Potential Enterprise Opportunity designation, and specified locations for commercial activities, the City questions the accuracy of this determination.

- The second paragraph on page 43 concludes that because UCD is exempt from local land use plans and policies, no impact would occur relative to possible inconsistencies. While it is true that UCD is exempt, this does equate to a determination of no impact. CEQA still requires disclosure, and, in appropriate circumstances, mitigation. We urge that the University consider the impacts of activities on campus to our shared community, and the need to address these impacts in a cooperative and responsible manner.

- On page 43, bottom paragraph, the reference to the Nishi property should be updated to indicate it is now designated Urban Reserve.

- It should be noted that the City level of service standards indicated in the top bullet on page 52 have changed with the recently updated General Plan. The 1994 analysis would have to be updated to reflect this change.

- Some of the traffic mitigations noted on the top of page 55 may need to be modified to reflect the City's new General Plan. Accordingly, the response to item 9 on page 57 should be changed to indicate some level of impact. The "no impact" determination does not seem appropriate.

In conclusion, the proposed Hotel/Conference Center raises significant issues about the future of the community and the University's role in ensuring that community character is reinforced and not degraded by campus related development. The City recognizes that some campus growth is inevitable, and that in most respects this benefits the community. Of fundamental concern to the City is the vagueness of the Enterprise Reserves concept contained in the 1994 LRDP, and how it is being implemented. The description of Enterprise Reserves on page 57 indicates that "an Enterprise approach can be utilized in almost any LRDP land use area to create space for research activities, faculty/staff housing, student housing, office space, recreation activities, open
space activities and cultural facilities". There is no reference to commercial activities. The only direct reference is on page 68, and it pertains only to the east end of First Street and is listed only under plan objectives.

From the City's perspective, the Hotel/Conference Center is neither inevitable at its proposed location nor is it clearly authorized under the LRDP. Given the concerns of the City in 1994 and earlier, the 1994 LRDP may have omitted use of the Enterprise Reserves in a broader context for intentional reasons. The University, at that time, likely recognized that creation of commercial clusters separated from downtown Davis was inconsistent with the community's vision. This recognition and shared community vision seems to have been lost through a series of tiered environmental documents and plan amendments that may have been inconsistent with the General Plan and LRDP and these inconsistencies were never addressed and remedied as part of the subsequent environmental review and LRDP amendments. Given these circumstances, the City strongly urges that the scope of the EIR be expanded, preferably in conjunction with the LRDP update process that is being initiated. To move forward without consideration of this process would surely impede opportunities for creative problem solving and joint solutions to challenges facing our community.

Sincerely,

[Signature]

Ken Wagstaff
Mayor, City of Davis

c: City Council
   Jeanie Hippler, Interim City Manager

Attachment
1. Transportation and Circulation Comments
Transportation and Circulation Comments

Comments were previously made in the letter dated October 27, 2000 from the city of Davis to the Vice Chancellor, John Meyer. A copy of this letter is attached to the current initial study in Appendix B, as Letter 1. The only response to Comments listed as 1-6 through 1-9, inclusive, appears to be that these issues will be examined and/or further explained in a subsequent document, the Draft Focussed EIR. We recommend that the preparer of that document, which is expected to be available in the fall, review the previously made comments and include specific discussion of the issues previously raised. We further recommend that the consultant contact and work with engineering staff from the city's Public Works department, to ensure that the impacts, if any, are fully disclosed and evaluated.

There are also specific concerns regarding the Transportation/Circulation analysis in the current initial study.

On page 53 of the study, it is noted that the 1994 LRDP includes mitigation measures for impact 4.3-1 which would reduce the impacts to a less than significant impact, but then seems to back away from mitigations because "... the University of California could not guarantee implementation of the mitigation measures because they fall within other jurisdictions to enforce or monitor." The focussed Draft EIR should specifically state which mitigations are feasible, and be clear as to the financial and monitoring obligations of the parties, whether it be the University, the City of Davis, CALTRANS, etc.

Of particular concern are the mitigation measures listed on pages 54 and 55 of the Initial Study:

"... the campus shall monitor a.m. and p.m. peak hour traffic at critical intersections on a regular basis (at least every three years)...." Has this been done, and if so, this information should be presented in the focussed Draft EIR.

"(a) Realign Old Davis Road..." The exhibit(s) showing the proposed reconfiguration should be included in the focussed EIR to facilitate review of that document.

For the mitigation measures (b) through (e), inclusive, exhibits of the proposed improvements, including right of way, width of lanes and other pertinent information should be included in the focussed EIR. The feasibility of some of these measures is questionable, and the financial responsibility for implementation is not addressed. It would appear that the University would be responsible for the costs of implementation, as the listed improvements are not currently contemplated in the city's General Plan, nor in the recently adopted General Plan Update, with the exception of the possible signalization of First Street at B Street. A signal project for this intersection is included in the city's Long Range Capital Improvement program. The focussed EIR should analyze this intersection, for current and future traffic, and should discuss what the University's prorata share for this improvement, when warranted.
Please note that the measures identified above are also shown in the text of Appendix A, on page 11.

The discussion in the focussed EIR should also examine, at some level, the implications to the city of some of the policies promoted for implementation of Mitigation Measure 4.3-1(b), particularly "... increased parking fees." The city has experienced numerous neighborhood complaints that are likely the result of parking fees, particularly for the University properties located within the city. The fact that the University charges fees for their parking lots within the city results in employees and staff using the free on-street parking which impacts the availability of parking for residents and other property owners.
LETTER 4: City Of Davis Mayor Ken Wagstaff And Councilmember Sue Greenwald (September 14, 2001)

Response to Comment 4-1

Comment noted. On July 16, 2001, the campus met with City of Davis Mayor Ken Wagstaff and City Councilmember Sue Greenwald to discuss the conference center and hotel project. In a letter to the Mayor and the City Council dated July 19, 2001, the campus outlined steps it proposes to address City concerns regarding the scope of the project. Primarily, the project was reduced in size from 150 rooms to 75 rooms. The campus also made changes to the project’s business plan that would: (1) eliminate perceived competitive advantages by eliminating tax-exempt financing and ensuring private financing by the developer; (2) charge fair market value for the land; (3) pay all applicable taxes in full; (4) require prevailing wage for conference and hotel construction and operation; (5) keep current arrangements for UC Davis business with local hotels to provide accommodations for visiting sports teams; (6) eliminate the complete meeting package so conference attendees will have more options to use local hotels and restaurants; (7) develop enhanced bicycle and pedestrian links along the Arboretum; and (8) use the interim tax generated by the project to increase occupancy in local hotels and to encourage patronage of downtown Davis businesses by paying the campus’ long term membership in the Davis Conference and Visitors Bureau and supporting joint marketing efforts (including tram service to downtown Davis).²³

Response to Comment 4-2

The appropriateness of a Focused Tiered EIR for the proposed project is explained on page 5 in the Initial Study and in Chapter 1 of this DEIR. Please also see Response to Comment 4-5.

Response to Comment 4-3

The Draft Tiered Initial Study for the Center for the Arts Performance Hall and South Entry Roadway and Parking Improvements Project was circulated for public and agency review from September 4, 1998 to October 5, 1998. In Section 3, Project Description, subsection Future South Entry Projects, the Initial Study addressed the following: “for the purposes of analysis, it is assumed that the site to the east of the Entry Quad could be developed as an academic building or a Hotel and Conference Center. For the purpose of the analysis in this Tiered Initial Study, cumulative impacts for utilities and traffic were evaluated consistent with these assumptions. The analysis includes an evaluation of the proposed amendment to the 1994 LRDP to change the land use designation to accommodate anticipated development on these sites. When the Campus identifies specific projects for these sites, additional environmental review would be conducted, as appropriate.” The City did not comment on this document.


3. Larry N. Vanderhoef, Chancellor, letter to Yolo County Board of Supervisors and Davis City Council, August 15, 2001.
A Draft Tiered Initial Study for the UC Davis Conference Center and Hotel, and University Relations Building project (a project that included a conference center, hotel, and an administrative building on the proposed project site) was circulated for public and agency review from September 26, 2000 to October 27, 2000. In response to comments received on this document (including comments from the City of Davis) and to provide additional information, the campus circulated a Revised Draft Tiered Initial Study for the Conference Center and Hotel, and University Relations Building project from November 17, 2000 to December 18, 2000. A public scoping meeting for the project was held on December 4, 2000. In response to comments received on the Revised Draft Tiered Initial Study (including comments from the City of Davis) and program changes, the campus made several changes to the previously proposed Conference Center and Hotel, and University Relations Building project. Differences between the previously proposed project and the currently proposed Conference Center, Hotel, and Graduate School of Management Building project are discussed on pages 6 to 8 of the August 2001 Tiered Initial Study (Appendix A). Appendix A and Chapter 1, Introduction, of this DEIR also include discussion of comments provided on the previously published Initial Studies.

Response to Comment 4-4

The campus has had ongoing discussions with the City regarding the project over the past two years. In response to concerns expressed by the City, the project was revised to lessen possible economic effects on Davis lodging facilities. Please see Response to Comment 4-1 for a complete list of these changes, including use of a three percent in-lieu fee charged to the hotel guests to increase occupancy in local hotels and to encourage patronage of downtown Davis businesses by paying the campus’ membership in the Davis Conference and Visitors Bureau and supporting joint marketing efforts (including tram service to downtown Davis).

Response to Comment 4-5

As discussed in Chapter 1, Introduction, the proposed project is consistent with the population projections identified in the 1994 LRDP for 2005-06 and is consistent with the land use designations identified in the 1994 LRDP, as amended. This DEIR is tiered from the 1994 LRDP EIR in accordance with CEQA and Section 15152 of the CEQA Guidelines. Section 15152 indicates that if projects are consistent with a general plan (the 1994 LRDP serves as the general plan for the campus), agencies are encouraged to use the analysis of general matters included in a broad EIR (in this case, the 1994 LRDP EIR) in later EIRs, and concentrate the later EIR solely on the issues specific to the later project.

The campus is in the early stages of formulating a revised LRDP that will take into account the population increases projected for the campus and associated development through 2014-15. After the LRDP is drafted, the campus will begin the required CEQA review process, which will entail a full analysis of the LRDP’s potential environmental impacts, both project-specific and cumulative. This will be accomplished in a comprehensive EIR for the revised LRDP. The campus expects to adopt a new LRDP in fall 2003, before population and facility growth anticipated in the 1994 LRDP are exceeded.

Because the revised LRDP is still in the planning stages, it would be premature and speculative to attempt to address the environmental impacts associated with the new LRDP in the project
level DEIR. However, because the projected new growth in enrollment is reasonably likely to occur, this DEIR will address the anticipated general effects of the population growth in the cumulative impacts analysis, where appropriate. This analysis is contained in the appropriate cumulative impacts sections of the DEIR and in Appendix D.

Response to Comment 4-6

As discussed in this DEIR in the discussion on Impacts 4.2-1, there is no evidence that the proposed project would result in adverse economic effects on the local lodging market. In fact, the project is expected to induce demand for local lodging and restaurant facilities and facilitate an increase in the room revenue for competitive lodging facilities over that achievable in the present market. The project would attract visitors to the City of Davis and would generate additional sales profits for local lodging facilities, restaurants, and other local businesses, thereby increasing City tax revenues. As discussed in Response to Comment 4-1, the campus has made several modifications to the project’s business plan to assist local businesses. In addition, the Board of Directors of both the Downtown Davis Business Association and the Davis Area Chamber of Commerce passed resolutions in support of the project. Future tax revenues generated by guests at the Conference Center and Hotel would go to the County of Yolo.

Response to Comment 4-7

Because an extensive long range planning process will be required before approval of the next LRDP (expected in 2003), demand for the project is already high, and the project planning process is already advanced, it would not be reasonable to delay the project until approval of the next LRDP.

In addition, as addressed in Response to Comment 4-5, the project is consistent with the 1994 LRDP and the campus has prepared a cumulative impact analysis to address anticipated future growth beyond that allowed under the 1994 LRDP EIR (see Appendix D).

Response to Comment 4-8

The analysis provided in this DEIR reflects the amended 1994 LRDP and is tiered from the 1994 LRDP EIR, as updated and revised. The Regents has amended the 1994 LRDP upon approval of subsequent projects (and associated certification of EIRs and adoption of Negative Declarations) that required land use designation changes to the 1994 LRDP. The Regents has updated and revised the 1994 LRDP EIR upon approval of projects (and certification of associated EIRs and adoption of associated Negative Declaration) that required changes to impacts and/or mitigation measures, or when new analyses presented in a certified EIR or adopted Negative Declaration changed the analyses presented in the 1994 LRDP EIR. The campus realized that the various amendments to the LRDP and revisions to the LRDP EIR could be confusing to the public. Accordingly, the campus has carefully and succinctly traced the history of these changes, and has provided a clear “road map” for the public to understand the revisions. This “road map” is provided in Appendix C of this DEIR.
Response to Comment 4-9

Please see Responses to Comments 4-5 and 4-9.

Response to Comment 4-10

An EIR had been prepared which evaluates potential impacts of the proposed project. As stated in Response to Comment 4-6 and as discussed in Impact 4.2-1 in this DEIR, there is no evidence that the proposed project would adversely affect the City’s economic base, fiscal stability, or community character.

Response to Comment 4-11

Upon approval of the design of the Center for the Arts Performance Hall and South Entry Roadway and Parking Improvements project and associated adoption of that project's Mitigated Negative Declaration, The Regents changed the land use designation of parcels within the south entry area and amended the 1994 LRDP. These changes to the LRDP included adding a Potential Enterprise Opportunity overlay to the High Density Academic and Administrative designation of the proposed project site.

The Regents did not amend the 1994 LRDP objectives for Enterprise Reserve areas identified in the 1994 LRDP, because the 1998 change to the project site's land use designation was consistent with these objectives. The designation is consistent with 1994 LRDP Enterprise Reserve Plan Objective 1, which states “Reserve high density academic and administrative lands near the academic core of the campus for Enterprise partnerships.” In addition, the proposed Conference Center, Hotel, and Graduate School of Management Building project is consistent with the project site's High Density Academic and Administrative designation with Potential Enterprise Opportunity overlay. On page 67 of the 1994 LRDP, the campus indicates that Enterprise activities are those primarily funded “as a University development partnership with another public organization or private entity,” and they are intended to include “projects that benefit campus academic programs by hosting public or private research and outreach activities on campus land.” The proposed project would be partially funded by a development partnership with a private entity. As discussed in Chapter 3 of this DEIR in the subsection titled the proposed conference center and hotel would accommodate academic conferences and professional meetings, thereby substantially contributing to UC Davis' academic program.

Existing High Density Academic and Administrative space on campus includes a variety of venues that generate revenue and are open to the general public, including those in the Memorial Union (the Coffee House, the campus Bookstore and computer shop, and a bowling alley) and in the Silo (Silo Pub and Café, Taco Bell, Carl's Jr., Pizza Hut, Sub-City Sandwiches, and Starbucks). These venues are consistent with the High Density Academic and Administrative designation because they support the campus's instruction and research mission. Similarly, the proposed conference center and hotel would be open to the general public, would be revenue-generating in nature, and would support the campus' instruction and research mission. As discussed in Chapter 3 of this DEIR in the subsection titled “Project Background and Need,” the proposed conference center and hotel would accommodate academic conferences and professional meetings, thereby substantially contributing to UC Davis' academic program.
The commenter identifies an incorrect reference to the 1994 LRDP that was included on page 31 of the Tiered Initial Study. This error has been corrected in the DEIR's discussion of “Consistency with the 1994 LRDP.” Please see Chapter 1 of this DEIR.

Please see also Response to Comment 4-12.

Response to Comment 4-12

As discussed in Response to Comment 4-11, the proposed project is consistent with the project site's land use designation and objectives for this designation. Plan Objective 4 (Commercial Uses), discussed on page 68 of the 1994 LRDP, did not establish land at the east end of First Street for commercial development to exclude revenue-generating development at other locations. As discussed in Response to Comment 4-11, there are several revenue-generating venues on campus that are open to the general public, including various restaurant establishments and the campus bookstore. These venues make profits and directly support academic programs. The proposed project, as discussed in this DEIR in Chapter 3, Project Description, would play an integral part in research efforts and is critical to the success of the UC Davis academic program. The proposed location would allow the project to work in combination with the adjacent Center for the Performing Arts and Buehler Alumni and Visitors Center to enhance UC Davis' role as a regional academic and arts center and meeting place. In contrast, as indicated in Plan Objective 4, the area at the east end of First Street was reserved for commercial development with low potential for direct campus uses.

Please also see Response to Comment 4-5.

Response to Comment 4-13

Please see Responses to Comments 4-5 and 4-8.

Response to Comment 4-14

The commenter identifies incorrect wording in the Draft Tiered Initial Study. As explained further in Responses to Comments 2-11 and 2-12, upon approval of the design of the Center for the Arts Performance Hall and South Entry Roadway and Parking Improvements project and associated adoption of the project's Mitigated Negative Declaration, The Regents amended the 1994 LRDP land use designation of parcels in the area, including the project site. The Center for the Arts Performance Hall and South Entry Roadway and Parking Improvements Tiered Initial Study and Mitigated Negative Declaration updates the 1994 LRDP EIR Land Use assessment to address potential land use inconsistencies with the 1994 LRDP and identifies associated project-specific mitigation measures. No comments on the Draft Tiered Initial Study were received that addressed the proposed amendments to the 1994 LRDP and revisions to the 1994 LRDP EIR (see Response to Comment 4-3). A comprehensive discussion of amendments to the 1994 LRDP and updates and revisions to the 1994 LRDP EIR is included as Appendix C of this DEIR.
Response to Comment 4-15

As discussed in Response to Comment 4-5, the proposed project does not exceed the population projections identified in the 1994 LRDP for 2005-06 and is consistent with the land use designations identified in the 1994 LRDP, as amended. The EIR for the proposed Conference Center, Hotel, and Graduate School of Management Building project is tiered from the 1994 LRDP EIR in accordance with Section 15152 of the CEQA Guidelines. Cumulative impacts associated with anticipate campus growth through 2014-15 that would surpass growth projected in the 1994 LRDP are analyzed throughout this DEIR and in Appendix D. Please see Response to Comment 4-5 for more details.

Response to Comment 4-16

As discussed on pages 42 to 43 of the Tiered Initial Study, the “no impact” conclusion that the commenter references was drawn with respect to conflict with the applicable land use plan, the 1994 LRDP. The 1994 LRDP is the applicable land use plan because the University of California is exempt from local land use plans and policies such as the City of Davis General Plan. However, as indicated on page 44 of the Tiered Initial Study, the 1994 LRDP EIR standards of significance considered that a significant impact would result if campus or regional growth would conflict with local land use plans. Therefore, this DEIR analyzes the project's potential to conflict with the current City of Davis General Plan (Impact 4.2-2). The campus finds that the proposed project would not conflict with locally adopted City planning policies. The project would attract visitors associated with academic, corporate, and association meetings held at the proposed conference center to the City of Davis. This would contribute additional patrons to downtown lodging facilities, restaurants, retail establishments, and other businesses. Therefore, the project would benefit local businesses and the City by generating additional sales revenues and taxes. As discussed in Response to Comment 4-1, the campus has made several modifications to the project’s business plan to assist local businesses. In particular, in the discussion on Impact 4.2-1 of this DEIR, the campus finds that the proposed project would not cause any physical deterioration in the downtown area of the City of Davis as a result of motel closures and an inability to re-use these properties. Please see also Response to Comment 4-10.

Response to Comment 4-17

Please see Responses to Comments 4-5, 4-11, and 4-12.

Response to Comment 4-18

Please see Response to Comment 4-16.

Response to Comment 4-19

The discussion of adjacent land uses is updated where appropriate in this DEIR.
Response to Comment 4-20

The 1994 LRDP EIR uses a standard of significance of LOS D for roadways in the City of Davis. The 2001 City General Plan allows for an LOS E for arterials and collectors during peak traffic hours, and an LOS D is acceptable for arterials, collectors and major intersections during non-peak hours. Under the 2001 General Plan, LOS F is acceptable during peak hours in the Core Area. Although the new city standards are less stringent than the 1994 LRDP EIR standards, the 1994 LRDP EIR standards are used in this analysis in order to provide a more conservative analysis (i.e., one that overestimates impacts [see Section 4.3]).

Response to Comment 4-21

Section 4.3, Transportation and Circulation, includes an updated discussion on the status of roadway improvements in the City of Davis, as applicable to the proposed project. It is unclear what the commenter is referring to with respect to Item 9 on page 57 of the Initial Study. The “No Impact” findings with respect to Items c, d, e, and g are described on pages 59 and 60 of the Initial Study. The University does not concur that information contained in the City’s 2001 General Plan would result in a finding of impact for these issue areas. In fact, updates to the City’s General Plan in 2001 with regard to acceptable LOS are less stringent than the LOS standards of significance used in the 1994 LRDP. The campus will continue to use the 1994 LRDP standards which will result, overall, in a more conservative analysis (i.e., one that overestimates impacts). Impacts 4.3-1, 4.3-3 and 4.3-4 remain significant and unavoidable because certain intersections would continue to exceed standards of significance in the 1994 LRDP EIR and the University cannot assure implementation of recommended intersection modifications that are within other jurisdictions to implement.

Response to Comment 4-22

The City recognizes that, in most respects, campus growth will benefit the community. Comment noted.

Response to Comment 4-23

In addition to the 1994 LRDP text quoted by the commenter, the description of Enterprise Reserves on page 67 in the 1994 LRDP goes on to state that the objectives of Enterprise activity include: projects where the land assets of the campus may be converted to income to support the academic mission; projects that benefit campus academic programs by hosting public or private research and outreach activities on campus land; and projects that require participations with the private sector for a quick response to campus academic or administrative needs. As discussed in Response to Comments 4-11 and 4-12, the proposed project clearly implements the Enterprise Reserves concept and is consistent with the 1994 LRDP, as amended, land use designation for the project site. The commenter quotes text from pg. 67 in the LRDP that identifies types of activities that could take place at Enterprise areas. The LRDP list was not exclusive and did not limit activities to only those listed.
Response to Comment 4-24

Please see Responses to Comments 4-5 and 4-8.

Response to Comment 4-25

Issues raised in previous comments on the previously proposed Conference Center and Hotel, and University Relations Building project were responded to in the Responses to Comments section of the currently proposed project’s Initial Study, included in Appendix A of this DEIR (see Responses to Comments 2-3 through 2-10). As appropriate and applicable to the currently proposed project, these comments were considered in preparation of this DEIR.

Response to Comment 4-26

The DEIR describes the mitigation measures proposed for the identified project-specific and cumulative impacts. A discussion is also included, where appropriate, with respect to feasibility and responsibility of proposed mitigation. Mitigation measures identified in the 1994 LRDP EIR that are required to mitigate impacts that are outside of the jurisdiction of the University (for example, the City of Davis) are also presented; however, because implementation of these measures is outside of the jurisdiction of the University to enforce and monitor, the impacts would remain significant and unavoidable.

With respect to the particular concerns raised by the commenter:

- The campus does monitor peak hour traffic volumes on a regular basis (most recently in March of 2000). The results are described in Section 4.3 of this DEIR and are incorporated in the section’s analysis.
- The realignment of Old Davis Road is under construction and is represented in Figure 3-2 in Chapter 2, Project Description of this DEIR.
- The current status and feasibility of 1994 LRDP EIR Mitigation Measures 4.3-1(b)(b) through (e) is discussed in Section 4.3 of the DEIR under Impact 4.3-3. Even with implementation of these measures, the cumulative impact would remain significant and unavoidable because certain intersections would continue to exceed standards of significance in the 1994 LRDP EIR and the University of California could not guarantee implementation of the mitigation measures because they fall within other jurisdictions to enforce and monitor.
- See the discussion under Impact 4.3-3. The intersection of First and B Streets is included in the analysis and no significant impact was identified. Please see Impacts 4.3-1 and 4.3-3 in Section 4.3 of the DEIR.

Response to Comment 4-27

1994 LRDP EIR Mitigation Measure 4.3-1(a) does require that the campus continue to actively pursue TSM strategies (including increased parking fees and shuttle bus systems). The proposed project would provide for adequate parking under both non-event and event conditions. See the discussion under Impact 4.3-2 in Section 4.3 of the DEIR. In addition, the proposed project site
is not located adjacent to City of Davis residential neighborhoods. Therefore, it is not anticipated that the proposed project would contribute to off-campus on-street parking.
September 17, 2001

Mr. John Meyer, Vice Chancellor
Office of Resource Management and Planning
One Shields Ave.
Davis, CA 95616-8678

SUBJECT: NOP - UCD Hotel/Conference Center Project

Dear Mr. Meyer:

I have reviewed the Notice of Preparation (NOP) for the above-referenced project. Please consider the following items for discussion and analysis in the EIR:

Alternatives

The NOP identifies the possibility of including several alternatives for analysis in the EIR. I recommend that each of the alternative ideas offered on page 9 of the NOP/Initial Study document be studied in the document. This project raises several important issues related to the most appropriate size and place for a project of this nature and therefore the reasonable range of alternatives required for an EIR should encompass a wide variety of alternatives.

The "No Hotel" alternative offers an important alternative that will allow judgment of the impacts of the project without the main commercial component that could otherwise be developed in the downtown area of Davis, in close proximity to the campus.

At least one of the alternatives analyzed should be developed by identifying the development that would be most consistent with the City of Davis General Plan in terms of location, size and type of land use.

An additional alternative that provides the hotel within, or immediately adjacent to, the downtown Davis area should be included in the analysis. This type of alternative would provide a project design that may address some of the impact concerns raised during the scoping of this document. This alternative would also be most capable of lessening or avoiding conflicts with the City's General Plan, which is an impact identified in the Initial Study.

Potential alternative sites for a hotel also include the existing open parking lot at the southeast corner of First Street and A Street, with the associated conference center being placed where the existing Faculty Club parking lot is located. A hotel in this location could easily serve a conference center located to the south, across the creek in the existing parking area adjacent to the Faculty Club. A combined project in this area would provide a project in close proximity...
(walking distance) to the downtown, the center of campus, and existing meeting facilities in the Faculty Club facility.

An additional site for the entire facility could be in the area between the UPRR tracks and I-80, in the vicinity of the bicycle path from the South Davis area.

Project Impacts

The Initial Study indicates that housing/population impacts will not be analyzed in this EIR. Since the Davis community is currently suffering from an acute shortage of affordable student housing, the EIR should analyze the impact of this project on the potential housing supply within the community. The land identified for the project site, or at least a portion of it, may well be suitable for the construction of student housing. It is close to the center of campus, near commercial facilities in the City, near transportation, and, in part, outside of the highest noise level contours for freeway and railroad noise. The project may contribute to population/housing impacts by reducing the amount of land suitable for student housing.

The land use and planning impacts section will be analyzing physical changes that may occur due to the economic impacts of operating the project. This analysis should discuss the experience of other cities that have experienced the economic decline of older downtown areas. For example, what impacts have been identified where an older downtown has undergone decline (i.e. peripheral development; traffic impacts from less compact development; blight)? Based upon the project description, the project appears to be designed to be highly self-contained and thus may be designed to avoid being interconnected with existing commercial areas.

The Initial Study notes (page 41) that there are no changed circumstances from the land use planning issued examined in the 1994 LRDP EIR that might require new cumulative assessments. The City of Davis has recently adopted a new General Plan. The new plan contains policies related to downtown development and general urban form that may be different than those considered by the LRDP. The City has recently adopted, or is considering adopting, infill standards, and traditional neighborhood design guidelines that should be examined in the context of physical changes that may occur as a result of the project's impacts. In addition, the current housing situation is different from that in 1994 and should be analyzed in the context of land use planning policies in the EIR.

The project objectives note (page 16 of the Initial Study) that the project would combine with the Performing Arts Center in a larger, regionally oriented center. The EIR should discuss the potential growth inducing impacts that may result from the development of a regional commercial/entertainment/meeting center at this site.

Thank you for sending me the NOP on this project. Please include me on the mailing list to receive all notices regarding this project.

Sincerely,

Fred Buderi
LETTER 5: Fred Buderi (September 17, 2001)

Response to Comment 5-1

An evaluation of several alternatives to the proposed project is presented in Chapter 6, Alternatives to the Proposed Project, in this DEIR. This chapter includes a discussion of off-campus alternative sites that were considered but rejected from further consideration. In addition, several other on-campus alternatives were fully evaluated.

Response to Comment 5-2

The “Conference Center Without a Hotel” Alternative on the project site is evaluated in Chapter 6 in this DEIR.

Response to Comment 5-3

As discussed further in this DEIR in the discussion regarding Impact 4.2-2, and as discussed in Response to Comment 2-16, the proposed project would not conflict with the current City of Davis General Plan (updated 2001). Alternatives to the proposed project are discussed in Chapter 6 of this DEIR.

Response to Comment 5-4

The analysis in Chapter 6 in this DEIR considers locations within the City of Davis. However, these alternatives were rejected from further consideration due to various reasons. Please see Chapter 6 of this DEIR for further information.

Response to Comment 5-5

The alternatives analysis in Chapter 6 evaluates putting a conference Center and hotel facilities at the First and A Streets location. Please see Chapter 6 of this DEIR.

Response to Comment 5-6

As discussed in Chapter 6 of this DEIR, the campus evaluated the location of the project on the Nishi triangle property located south of the UPRR tracks and north of I-80. However, this alternative was rejected from detailed analysis because it could not feasibly obtain most of the project objectives, would not reduce or avoid significant environmental impacts, and was considered infeasible.

Response to Comment 5-7

The current land use designation for the project site (Academic and Administrative High Density – Potential Enterprise Opportunity and Parking) does not provide for student housing. The proposed project, including associated increase in campus staff (no increase in students would result), is within the scope of the 1994 LRDP, as amended. Therefore, population and housing impacts associated with the proposed project have already been adequately evaluated in the 1994
Appendix B

LRDP EIR, as updated and revised. As discussed further in Response to Comment 4-5, the campus prepared a Cumulative Impacts Analysis (Appendix D) that addresses the cumulative impacts associated with potential growth in the campus population associated with development through 2014-15 that would surpass growth projected in the 1994 LRDP for 2005-06.

Response to Comment 5-8

The experience of other cities with respect to the economic decline of older downtown areas is not relevant to the analysis of the proposed project because this DEIR (see discussion regarding Impact 4.2-1) provides supporting evidence that the proposed project would not lead to physical blight in the City of Davis as a result of motel closures and an inability to reuse properties. In fact, the project would attract conference attendees and hotel guests to the City of Davis, thereby generating additional profits for local businesses and city tax revenues. The economic impact study is presented in Appendix E of the DEIR. See also Response to Comment 4-6.

Response to Comment 5-9

Section 4.2, Land Use, and Section 5.1, Growth-Inducing Impacts, in this DEIR recognize that the City of Davis adopted an update to the General Plan in May 2001. The discussion regarding Impact 4.2-2 in Section 4.2, Land Use, in this DEIR addresses consistency with current adopted General Plan policies. This DEIR does not identify any significant land use impacts. City infill standards and traditional neighborhood design guidelines would not be applicable to the proposed project because the proposed project site is within the campus and not the city.

Response to Comment 5-10

The Davis area growth projections identified in the May 2001 General Plan have not changed from the previous General Plan and 1994 LRDP EIR assumptions (75,000 persons by 2010). Both the 1994 LRDP EIR and May 2001 General Plan identify a campus enrollment of 26,000 by 2005-06. The proposed project, including contribution of campus employees (no student population growth would occur as part of this project) is consistent with these projections. Therefore, there are no changed circumstances related to population that would require new assessments of housing-related land use policy consistency. However, as discussed further in Response to Comment 4-5, the campus prepared a Cumulative Impacts Analysis (Appendix C) that addresses the cumulative impacts associated with reasonably foreseeable growth in the campus population through 2014-15 that would surpass growth projected in the 1994 LRDP for 2005-06.

Response to Comment 5-11

The proposed project does not involve the development of a “regional commercial/entertainment/meeting center,” as suggested by the commenter. The proposed project would provide much-needed conference and meeting space and would work in combination with the proposed hotel, Center for the Performing Arts (under construction) and existing Buehler Alumni and Visitors Center to enhance UC Davis' role as a regional academic and arts center and meeting place.
Potential growth-inducing effects of the proposed Conference Center, Hotel, and Graduate School of Management Building project are discussed in Section 5.1 in this DEIR. Potential growth-related effects of the Center for the Performing Arts were discussed on page 33 in the Center for the Arts Performance Hall and South Entry Roadway and Parking Improvements Tiered Initial Study.
From: Marcie Kirk Holland <makirk@ucdavis.edu>
To: environreview@ucdavis.edu
Subject: Comments on Conf and GSM Facility
Mime-Version: 1.0
Content-Type: text/plain; charset="us-ascii"

Why only 100 parking spaces? If there are 75 guest rooms in addition to UCD offices 100 spaces seems inadequate. I absolutely agree that there should be open space and attractive grounds. Is there a way to build additional parking underground? This could alleviate the need for additional open spaces to be turned into parking, elsewhere on campus. There will be more and more people coming to campus - likely in cars. Let's accept that for now and incorporate parking into the building designs. There are also safety considerations. GSM hold many classes at night. If parking is within the same structure it seems safer.

Those are my thoughts.
Marcie Kirk Holland
Internship & Career Center
LETTER 6: Marcie Kirk Holland, UC Davis Internship and Career Center
(August 17, 2001)

Response to Comment 6-1

Parking impacts of the proposed project are evaluated in Impact 4.3-2 in this DEIR. Approximately 100 surface parking spaces (for overnight guests, restaurant and pub patrons, and Graduate School of Management and University Relations visitors) would be provided on-site immediately south of the proposed Graduate School of Management Building (see Figure 3-4). Approximately 75 existing parking spaces in Parking Lot 1 would be provided off the project site and immediately to the south for hotel guests and for restaurant and pub patrons as needed. Parking for conference attendees would be available in existing visitor parking spaces near the project site, including approximately 785 surface parking spaces in Parking Lots 1 and 2 (approximately 638 remaining spaces in Lot 1 and 147 spaces in Lot 2). In addition, 716 visitor parking spaces would be available for conference attendees in the South Entry Parking Structure on weekends and after 5:00 p.m. on weekdays. With special arrangement, spaces could be made available in the structure for conference attendees before 5:00 p.m. on weekdays. As discussed in Impact 4.3-2, given recent winter utilization rates in the South Entry area and the amount of parking supply, parking near the project site would be adequate to serve operation of the proposed project.