



Solano Local Agency Formation Commission

675 Texas St. Ste. 6700 • Fairfield, California 94533
(707) 439-3897 • FAX: (707) 438-1788

Monica E. Brown, District 2 Supervisor
Solano County Board of Supervisors
Email: mebrown@solanocounty.com

December 7, 2018

Supervisor Brown,

Thank you for your correspondence concerning the Pacific Flyway Education Center's (project) potential impact on the Cordelia Fire Protection District (District). I appreciate your concern regarding the service and funding impacts on the District.

Solano LAFCO expressed similar concerns in our August 13, 2018, comment letter to the City (attached Response to Comments report – pgs. 16-19). Specifically, LAFCO comment #5 requested an analysis and discussion on fire and police protection, and whether the project will result in the need to increase the number of personnel for these public services. In response, the City, the lead agency, advised, "The project does not cross any established City of Fairfield threshold which would require an increase in personnel for fire or police services."

Fire service impacts were further discussed in the Final Initial Study and Mitigated Negative Declaration (page 43) (Study attached). The Initial Study has determined that with current staffing levels and existing agreements for mutual and auto response aid, the City Fire Department (Department) will be adequately prepared to respond to and administer emergency fire and medical services to the project. In preparing the Initial Study, responses were solicited from providers regarding the proposal and no adverse comments were received, including no adverse response from the District or the Department.

The project involves the annexation of two parcels: APNs 0046-050-300 and 0046-100-260. These two unincorporated parcels were State owned and are part of a land-exchange with the Pacific Flyway Fund. The annexation of these two parcels is necessary to obtain the provision of City services, such as sewer and water, to serve the project's needs.

Concerning funding, as noted above, the two parcels to be annexed were State-owned parcels that generated zero property tax and were exempt from the District's assessment.

Upon annexation, the project will be within the City of Fairfield Fire Department's boundary and detached from the District's boundary. Review of the project noted that the Department's station #35 is closest to the project. Department Station #35 is approximately 2.5 miles from the project versus the 3.8 miles from District Station #31.

Sincerely,

Rich Seithel

Cc: Cordelia Fire Protection District
City of Fairfield

Commissioners

Harry Price, Chair • Jim Spering, Vice-Chair • Pete Sanchez • Nancy Shopay • John Vasquez

Alternate Commissioners

Len Augustine • Shawn Smith • Skip Thomson

Staff

Rich Seithel, Executive Officer • Michelle McIntyre, Analyst • P. Scott Browne, Legal Counsel

PACIFIC FLYWAY CENTER

APPENDIX F INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION

RESPONSE TO COMMENTS



City of
FAIRFIELD California

www.fairfield.ca.gov

COMMENT LETTER 5: Solano County LAFCO



August 13, 2018

Amy Kreimeier, Assistant Planner
City of Fairfield – Planning Division
1000 Webster Street
Fairfield CA 94533

RECEIVED

AUG 20 2018

CITY OF FAIRFIELD
COMMUNITY DEVELOPMENT

Re: Pacific Flyway Center – Mitigated Negative Declaration – Public Review and Comment;
APNs 0046-050-300, 0046-100-260, (and adjacent APNs 0046-050-310, and 0046-100-270)

Dear Ms. Kreimeier:

Thank you for the opportunity to comment on the City of Fairfield's (City) Pacific Flyway Center's Initial Study and Mitigated Negative Declaration (MND). Pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines (Article 7 15096(d)), the Local Agency Formation Commission of Solano County (LAFCO), as a Responsible Agency, should review and comment on draft EIRS and MND for projects which it would later be asked to approve. Solano LAFCO provides the following six comments concerning the identified MND sections:

- 1) **Other Public Agency Approvals (MND page 4)** – City should provide a complete list of required LAFCO approvals/actions:
 - a. Municipal Service Review study,
 - b. Sphere of Influence Update,
 - c. City of Fairfield annexation,
 - d. Fairfield Suisun Sewer District annexation¹,
 - e. Cordelia Fire Protection District detachment, and,
 - f. Solano County Lighting Service Area detachment

- 2) **Agriculture and Forest Resources (MND page 10)** – City should provide analysis and discussion with respect to Prime Agricultural Lands pursuant to California Government Code Section (GC §) 56064 (following excerpt).

¹ Required per the Fairfield Suisun Sewer District Act (State of California Chapter 103 Statutes of 1951, Article 1 Section 1)

Commissioners

Harry Price, Chair • Jim Spiering, Vice-Chair • Pete Sanchez • Nancy Shopay • John Vasquez

Alternate Commissioners

Len Augustine • Shawn Smith • Skip Thomson

Staff

Rich Seithel, Executive Officer • Michelle McIntyre, Analyst • P. Scott Browne, Legal Counsel

PACIFIC FLYWAY CENTER RESPONSE TO COMMENTS

"Prime agricultural land" means an area of land, whether a single parcel or contiguous parcels, that has not been developed for a use other than an agricultural use and that meets any of the following qualifications:

(a) Land that qualifies, if irrigated, for rating as class I or class II in the USDA Natural Resources Conservation Service land use capability classification, whether or not land is actually irrigated, provided that irrigation is feasible.

(b) Land that qualifies for a Storie Index rating of 80 through 100.

LAFCO staff conducted a preliminary analysis of soil classifications within the proposal site and found land that meets the prime agricultural land definition. (Attached map exhibit and soil description from USDA Natural Resources Conservation). Approximately 120-130 acres of the site appear to meet soil classifications that qualify as "prime agricultural land" under the LAFCO definition. In order for this analysis to meet LAFCO's requirement and the requirements of CEQA, it may be helpful if the environmental analysis explains the previous historical use of this land, its history of agricultural production (if any), and current status. We also suggest providing reasoned analysis why the permanent removal of this acreage from potential agricultural production is not likely to result in a significant loss of agricultural land that creates a significant impact on the environment. If there is a potential for significant impacts, the analysis should discuss any potential mitigation measures.

- 3) **Agriculture and Forest Resources** (MND page 10) City should provide analysis and discussion with respect to the conversion of open space lands pursuant to GC §56377, "open space" as defined by GC §56064, §65560. Additional information that LAFCO requires is an analysis of the availability of other developable land located within the City limits, or elsewhere in the City sphere, that is suitable for this particular use that does not "prime agricultural land" or land devoted to "open space" uses as defined by LAFCO standards.
- 4) **Land Use and Planning** (MND page 36) City's list of approval requirements for LAFCO should be consistent with the list under the Other Public Agency Approvals section.
- 5) **Public Services** (MND page 41) City should provide analysis and discussion on fire protection and police services, for example; will the project result in the need to increase the number of personnel for these public services?
- 6) **Public Services** (MND page 41) City should provide analysis and discussion to address the creation of a service island. Per the MND, the City will request annexation of

PACIFIC FLYWAY CENTER RESPONSE TO COMMENTS

Assessor Parcel Numbers (APNs) 0046-050-300, 0046-100-260 and will not seek annexation of APNs 046-050-310 and 046-100-270; the latter APNs will remain under the jurisdiction of the Solano County Sheriff and the Cordella Fire Protection District. The City should explore pursuing a memorandum of understanding with these two agencies to provide greater clarity and efficient provision of services to the subject areas.

Amy, in addition, it may be helpful for the City, as the Lead Agency, to include a list of other agencies that were provided a copy of the environmental documents pursuant to Section 15073(c) of the CEQA Guidelines. (e.g. it is unknown if Solano County, Solano Transportation Authority, or the Bay Area Air Quality Management District received the subject environmental document).

We appreciate the opportunity to comment on the subject environmental document. Please contact our Executive Officer, Rich Seithel, at 707-439-3897 or rseithel@solanolafco.com should you have any questions.

Sincerely,



James Spering
Vice-Chair

Solano Local Agency Formation Commission

Attachments: Map exhibit and soil description from USDA Natural Resources Conservation

RESPONSE TO COMMENT:

Solano County LAFCO (LAFCO) is a Responsible Agency under CEQA. The IS/MND prepared for the project will inform LAFCO of the environmental effects of the project that it will later be asked to approve. LAFCO has requested further clarification on the topics of Agriculture and Forest Resources and Public Services, and for a complete list of the required LAFCO approvals. The complete list of approvals has been added to the list of Other Public Agency Approvals found on page 4, and added to the Land Use and Planning section on page 38 of the Final IS/MND.

The California Department of Conservation Farmland Mapping and Monitoring Program prepares maps and compiles statistical data used for categorizing agricultural lands and analyzing related impacts. These maps classify the farmlands of the state as prime farmland, farmland of statewide importance, unique farmland or farmland of local importance (together, "status farmlands"). Other mapping classifications, such as grazing land and urban land, are not considered status farmlands. The subject site is classified as grazing land on the Solano County Important Farmlands map prepared pursuant to the Farmland Mapping and Monitoring Program of the

PACIFIC FLYWAY CENTER RESPONSE TO COMMENTS

California Resources Agency. Therefore, under CEQA, the Draft IS/MND correctly determined that the project would not result in an impact to status farmland.

However, the Cortese-Knox-Hertzberg Act of 2000 mandates that the LAFCO consider how spheres of influence or changes of organization could affect open space and prime agricultural land. Prime agricultural land is defined in California Government Code Section 56064, and does not have the same meaning as status farmland. To ensure that the IS/MND provides the information needed by LAFCO, additional analysis and discussion has been added to the Agricultural and Forest Resources section of the Final IS/MND on pages 10-12. The newly-added text discusses the site's status as prime agricultural and open space land, provides information on the historic and current uses of the site, and demonstrates why the permanent removal of this land from agricultural production will not result in a significant loss of agricultural land that creates a significant impact on the environment. It also elaborates on the loss of open space lands pursuant to California Government Code Sections 56377, 56064 and 65560, and explains why other land within the current City limits would not be suitable for the project.

In addition to the paragraphs above, further information and analysis was added to the Public Services section on pages 43 and 44 of the Final IS/MND, in order to clarify the fire protection and police services that will be available to serve the project site. The project does not cross any established City of Fairfield threshold which would require an increase in personnel for fire or police services. The analysis determined that development of the site would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any public services. Further, the additional analysis added to the Final IS/MND discusses the process for which agreements between the City of Fairfield and the Cordelia Fire Protection District and Solano County Sheriff for the continued provision of services for parcels 0046-050-310 and 0046-100-270 will be formalized.

XIV. PUBLIC SERVICES

Potentially Significant Impact	Less Than Significant With Mitigation	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	--------------

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

Fire protection?		X	
Police protection?		X	
Schools?			X
Parks?			X
Other public facilities?			X

Discussion: The project has been reviewed by the Building and Fire Safety Division, Fire Department and Police Department. Responses were solicited from public service providers regarding the proposal. No adverse comments were received. It is anticipated that this project will have no significant impact upon public services.

The two parcels proposed for annexation into the City of Fairfield are currently located within the boundaries of the Cordelia Fire Protection District (CFPD). Upon approval of the annexation of parcels 0046-050-300 and 0046-100-260, they will receive fire protection service from the City of Fairfield Fire Department. The City of Fairfield Fire Department is the primary service provider for fire protection services within the City limits. Each of the department's five fire stations are staffed with an engine company composed of a captain, firefighter, and firefighter paramedic. The Fairfield Fire Department has automatic response agreements with neighboring fire agencies and adjacent fire jurisdictions to respond to close proximity calls, as well as to receive assistance from neighboring agencies when requested. Additionally, the Department participates in a mutual aid system that responds to requests for aid from throughout Solano County and the State.

The City of Fairfield General Plan does not have an adopted threshold of significance for fire response services for commercial properties. However, in 2017, the average response time for all apparatus was 5 minutes 46.8 seconds. The City of Fairfield's Fire Station 35 is located 2.5 miles from the project site and will respond to service requests at the site, with the ability to call upon mutual aid and auto response agreements when needed. Fire Station 35 currently and historically receives the lowest call volume and is

equipped with brand new facilities. It is anticipated that with current staffing levels and existing agreements for mutual and auto response aid, the City will be adequately prepared to respond to and administer emergency fire and medical services to the Pacific Flyway Center.

The project site is currently located within the jurisdiction of the Solano County Sheriff's Department. Upon approval of the annexation of parcels 0046-050-300 and 0046-100-260, these two parcels will receive law enforcement service from the City of Fairfield Police Department. The Fairfield Police Department provides local law enforcement services within the City's jurisdictional boundary, and existing mutual aid agreements allow local, regional, and state agencies to cooperate on major police and public safety emergencies. The Police Department is headquartered in the Fairfield Civic Center at 1000 Webster Street, Fairfield, CA 94533, approximately 10 miles from the project site.

The City of Fairfield General Plan calls for an average emergency response time of 5 minutes. In 2016, the Police Department's average response time was 4 minutes, 8 seconds from dispatch to arrival for emergency calls, well within the operating standard of five minutes. The General Plan also calls for a service ratio of sworn officers to population to be in the range of 1.13 to 1.20 officers per one thousand residents. The City currently meets this General Plan requirement, and the project is not proposed to increase residential population. Therefore, the project will not result in a significant impact to police service ratios or response times, which would require additional police staff or facilities.

The two easternmost parcels, 0046-050-310 and 0046-100-270, contain significant areas of wetlands and primary management marshland, which significantly restricts the applicant's ability to modify or develop these parcels. As such, the applicant is not requesting to annex these parcels into the City. As unincorporated areas, the parcels will continue to receive fire protection services from the Cordelia Fire Protection District and police protection services from the Solano County Sheriff's Department. Agreements between the City of Fairfield and both the Cordelia Fire Protection District and Solano County Sheriff's Department for the continued provision of services and access to these parcels will be formalized as part of the LAFCO annexation process. It is not anticipated that reducing the service area for the Cordelia Fire Protection District or the Solano County Sheriff's Department would have a significant impact on the ability of these agencies to maintain acceptable service ratios, response times or other performance objectives for any of the public services they provide. Therefore, this impact is considered less than significant.

(Source: 2, 3, 4, 6, 25, 39, 40)

XV. RECREATION

- a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial

Potentially Significant Impact	Less Than Significant With Mitigation	Less than Significant Impact	No Impact
--------------------------------	---------------------------------------	------------------------------	-----------

X