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August 14, 2025

**Memo to:**

Raffi Boloyan, Community Development Director City of Dixon Community Development Department 600 East A St. Dixon, CA 95620  
planningdepartment@cityofdixonca.gov

**From:**

Bob Berman, Solano County Orderly Growth Committee  
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**Subject: City of Dixon Notice of Preparation Harvest Master Plan, Southeast Annexation, and General Plan Amendment Project Draft Environmental Impact Report**

The Solano County Orderly Growth Committee has the following comments on the above-mentioned Draft EIR.

**Area of Interest**

The City is proposing to include approximately 3,408 acres in an Area of Interest. It is not clear what is the purpose and intent of the Areas of Interest and under what section of the California Government Code or Local Agency Formation Commission regulations these land use designations are being prepared.

Furthermore the NOP states that "... this EIR does not include an analysis of the Area of Interest". Since it appears that there is no basis for including these Areas of Interest in the project and the EIR is not going to prepare any type of analysis we request that they be removed from the project description.

**Lombardo Ranch Project**

Regarding the Lombardo Ranch Project, the NOP states “… this analysis will consider the Lombardo Ranch project at a programmatic level, and it is expected that a separate environmental review will be conducted when the project is more clearly defined.”

It is not clear to us what the extent of the future environmental review will consist of. We are concerned that when a future development application is submitted City staff will determine that since a previous programmatic EIR was prepared for Lombardo the only additional environmental review necessary will be a Negative Declaration. We find this to be unacceptable.

We request that the EIR now be being prepared clearly state that when a future Lombardo Ranch development application is submitted a full Environmental Impact Report will be prepared.

**Generic Nature of Scope of Work**

We are concerned with the generic nature of the description of the impacts to be evaluated in the EIR as listed in the NOP.

Each topical area is only very generally described. For example, in the transportation section the NOP only states that impacts to the circulation system including roadways will be discussed. It does not state which roadways will be evaluated. For example, will impacts to Highway 113 be evaluated? Which specific Highway 113 intersections will be evaluated? Will impacts to Interstate 80 be discussed? Which Interstate 80 interchanges be evaluated?

We request that each of the topical areas to be evaluated be expanded to state the specific analyses that will be evaluated.

**Cumulative Impacts**

Both the City of Dixon and Solano County are currently under unprecedented development proposals. It is critical that this EIR prepares complete and comprehensive cumulative impacts analyses. The NOP states “In addition to the potential environmental impacts noted above, the Draft EIR will evaluate potential cumulative impacts and potential growth-inducing effects associated with proposed project implementation.” Unfortunately, the NOP does not provide specific information regarding the specific projects which will be included and the level of analysis.

We request that two levels of cumulative impact analysis be prepared.

*City of Dixon*

In addition to the Harvest at Dixon Project, the map included in the NOP shows the location of the Brookfield Lombardo Ranch Project, three Sphere of Influence changes (Areas A, B, and C) and several Areas of Interest. It is noted that all of the Sphere of Influence changes and the Areas of Interested are located within the City’s Potential Greenline Boundary. We therefore conclude that the only reason the City is proposing the Sphere of Influence changes and the Areas of Interest is to accommodate future development. As noted in the NOP, the City will pre-zone the 3,153 acres in the Sphere of Influence areas. So, the City must make some reasonable assumptions regarding the development that will occur in the future areas to be annexed to the City.

Regarding the Areas of Interest it is not clear to us the purpose of this designation, but we can only conclude that the City’s long term goal is for urban development in these areas. Therefore, future development of these areas must be included in the cumulative analysis.

Regarding the Lombardo Ranch project reasonable development assumptions must be prepared for inclusion in the cumulative analysis.

*City of Dixon plus the remaining areas of Solano County.*

We request that the City complete a comprehensive search for all of the current proposed development projects in the other six cities in Solano County plus in the unincorporated area. Some of the projects we are aware of include:

*The Collinsville Shipyard Complex* – California Forever proposes to construct a shipyard complex on 1,200 acres it owns near Collinsville, along the Sacramento River. We have seen estimates that the proposed project will create tens of thousands of jobs.

*City of Rio Vista* – It is understood that the City of Rio Vista is considering entering into a reimbursement agreement with California Forever to study the development of lands California Forever owns within the City of Rio Vista.

*City of Suisun City* – Suisun City has recently signed an agreement with California Forever to study the expansion of the City limits. The proposed expansion area includes:

1) the Travis Protection Zone, consisting of approximately 5,726 acres,

2) the Lambie Industrial Park, consisting of approximately 1,410 acres, and

3) the Suisun Expansion Specific Plan, consisting of approximately 15,737 acres.

The Suisun Expansion Specific Plan appears similar to the previously proposed California Forever megacity,

*California Forever* - Flannery Associates owns more than 60,000 acres in Solano County. It has been proposed to develop a megacity on 17,500 acres it owns. The city is proposed to have 400,000 residents. California Forever has also proposed the Solano Foundry. The 2,100-acre foundry project is proposed to be a high-tech manufacturing park consisting of 40 million square feet of development and up to 40,000 jobs.

It is understood that there may be overlap with the current Suisun City annexation study and the development of a separate megacity by California Forever. We believe that for the purposes of this EIR cumulative analysis the complete buildout of the 400,000-resident megacity, including the Solano Foundry, must be analyzed.

This list of projects is by no means a complete list of proposed development projects in the seven Solano County cities plus the County’s unincorporated area. We request that a complete review of all the proposed projects in Solano County be prepared, and the cumulative impacts of these projects be included in the EIR being prepared by the City of Dixon.