

FINAL
ENVIRONMENTAL IMPACT REPORT

WILLOWS WAL-MART PROJECT

STATE CLEARINGHOUSE NO. 2004062128

CITY OF WILLOWS
201 NORTH LASSEN STREET
WILLOWS, CA 95988

JANUARY 2006

RESPONSES TO COMMENTS RECEIVED ON DRAFT EIR
REVISIONS TO DRAFT EIR

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STATE CLEARINGHOUSE NO. 2004062128

Prepared for

CITY OF WILLOWS
201 NORTH LASSEN STREET
WILLOWS, CA 95988

Prepared by

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JANUARY 2006

PREFACE

The document, together with the Draft Environmental Impact Report (DEIR) for the Willows Wal-Mart project, constitutes the Final Environment Impact Report (FEIR) for the proposed project. The Final EIR is an informational document prepared by the Lead Agency that must be considered by the decision-makers before approving the proposed project (CEQA Guidelines Section 15090). The California Environmental Quality Act (CEQA) Guidelines (Section 15132) specify that a Final EIR shall consist of the following:

- The Draft EIR or a revision of the Draft.
- Comments and recommendations received on the Draft EIR either verbatim or in a summary.
- A list of persons, organizations, and public agencies commenting on the Draft EIR.
- The responses of the Lead Agency to the significant environmental points raised in the review and consultation process.
- Any other information added by the Lead Agency.

In conformance with the CEQA Guidelines, the Final EIR provides objective information regarding the environmental consequences of the proposed project. The Final EIR also examines mitigation measures and alternatives to the project intended to reduce or eliminate significant environmental impacts. The Final EIR is used by the City and other Responsible Agencies in making decisions regarding the project. The CEQA Guidelines require that, while the information in the Final EIR does not control the agency's ultimate discretion on the project, the agency must respond to each significant effect identified in the Draft EIR by making written findings for each of those significant effects before it approves a project.

According to the CEQA Guidelines (§15091), no public agency shall approve or carry out a project for which an environmental impact report has been certified which identifies one or more significant environmental effects of the project, unless the public agency makes one or more written findings for each of those significant effects. According to the State Public Resources Code (Section 21081), no public agency shall approve or carry out a project for which an environmental impact report has been certified which identifies one or more significant effects on the environment that would occur if the project is approved or carried out unless *both* of the following occur:

- a) The public agency makes one or more of the following findings with respect to each significant effect:
 - 1) Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment.
 - 2) Those changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been required or can and should be adopted by that other agency.
 - 3) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities of highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.
- b) With respect to significant effects which were subject to a finding under paragraph (3) of subdivision (a), the public agency finds that specific overriding economic, legal, social, technological, or other benefits of the project outweigh the significant effects on the environment.

The Final EIR is to be made available to the public ten (10) days prior to the EIR certification hearing.

All documents referenced in this EIR are available for public review at the office of the City of Willows, City Hall, 201 North Lassen Street, Willows, California 95988, on weekdays during normal City office hours of 8:30 AM to 5:00 PM.

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ATTACHMENTS

I. LIST OF AGENCIES, ORGANIZATIONS AND INDIVIDUALS RECEIVING THE DRAFT EIR

State Agencies

California Department of Transportation (Caltrans), District 3
California Department of Transportation (Caltrans), Division of Transportation Planning
California Department of Transportation (Caltrans), Division of Aeronautics
California Highway Patrol
Office of Planning and Research, State Clearinghouse
California Resources Agency
California State Water Resources Control Board
California Regional Water Quality Control Board, Central Valley Region 5b
California Department of Conservation
California Department of Fish and Game, Region II
California Department of Food and Agriculture
California Department of Health Services
California Air Resources Board
California Solid Waste Management Board
California State Office of Historic Preservation
Native American Heritage Commission

Local Agencies, Districts and Utilities

Glenn County Air Pollution Control District
Glenn County Health Department
Glenn County Agricultural Commissioner
Glenn County Human Resources Agency
Glenn County Clerk
Glenn County Planning and Public Works Agency
Glenn County Department of Public Works
City of Willows Police Department
City of Willows Fire Department
City of Willows Public Works Department
City of Willows Public Library
Willows Unified School District
Glenn-Colusa Irrigation District
California Water Service Company
Pacific Bell

Local Organizations and Individuals

Bob Saint-Evens, Safety Tire Service, Inc.
Holiday Quality Foods, Store #35
Willie Woo, Sani-Food Market
William Kopper, Attorney-at-Law

II. LIST OF AGENCIES, ORGANIZATIONS AND INDIVIDUALS COMMENTING ON THE DRAFT EIR

Presented below is a list of agencies, organizations, and individuals who submitted written comments on the Draft EIR.

- A. California Department of Transportation (Caltrans) – September 19, 2005
- B. California Department of Transportation (Caltrans) – October 24, 2005
- C. California Department of Transportation (Caltrans), Division of Aeronautics – October, 28, 2005.
- D. California Regional Water Quality Control Board (RWQCB) – Central Valley Region
- E. Glenn County Department of Public Works
- F. Claire Arano, Ginter & Brown Realty
- G. Lorraine Baird
- H. Gladys M. Bettencourt
- I. Suzy Boyd et al.
- J. Jon S. Hays, Westside Outdoorsman
- K. Cindy Holder
- L. Earl and Pat Hoops
- M. Viola M. Lederer
- N. Marianne Madariaga
- O. John D. Minniear
- P. Hoover H. Mock
- Q. Debbie Owen et al.
- R. Debbie Owen
- S. Edna Roberts
- T. Bob Saint-Evens, Safety Tire Service, Inc.
- U. Laura Schauer
- V. Shirley Shumin

III. RESPONSES TO WRITTEN COMMENTS RECEIVED ON THE DRAFT EIR

This section includes all of the comments contained in the letters received during the 45-day review period advertised for the Draft EIR, and responses to those comments. The specific comments have been copied from the letters and presented as “Comment” with the “Response” directly following. Copies of the actual letters received are found in their entirety in Section VI of this document.

A. RESPONSES TO COMMENTS FROM THE CALIFORNIA DEPARTMENT OF TRANSPORTATION (CALTRANS), DATED SEPTEMBER 19, 2005

Comment A-1:

As of September 22, 2005, the Caltrans single point of contact assigned to work with the City of Willows on local government planning activities is Randy Evans...

Response A-1:

Comments noted. Although this letter was received during the DEIR public comment period, it does not contain any comments or information which relate specifically to the Draft EIR. As such no response is necessary or required. The City of Willows will make sure that future correspondence regarding the EIR, including providing Caltrans with a copy of the City’s responses to its comments prior to certification of the Final EIR, will be directed to Mr. Evans. (Note: Caltrans’ comments on the DEIR are contained in a subsequent comment letter, addressed below.)

B. RESPONSES TO COMMENTS FROM THE CALIFORNIA DEPARTMENT OF TRANSPORTATION (CALTRANS), DATED OCTOBER 24, 2005

Comment B-1:

Reference to Section I., B., Figure 5, Conceptual Site Plan

We concur with the proposed change to the existing easterly entrance to Wal-Mart to right in - right out with a raised median on SR 162. This change will eliminate left turns out of the Wal-Mart driveway and moves across the highway from the existing Airport Road.

Response B-1:

Comment noted. No response is necessary or required.

Comment B-2:

Reference to Section I., B., Figure 5, Conceptual Site Plan

We concur that a right turn lane should be constructed on eastbound SR-162 approaching the southbound I-5 on-ramp; since the structure only has sidewalks on the south side of the structure the right turn lane should be designed to assist pedestrians crossing this on-ramp.

Response B-2:

Comment noted. The Conceptual Site Plan replaces the existing slip ramp with a right-turn lane in order to reduce crossing distance for pedestrians across this south leg of what will become a signalized intersection, in conjunction with the Wal-Mart project. The Conceptual Site Plan also shows a striped pedestrian crosswalk across this ramp entrance to improve safety for pedestrians approaching along the existing sidewalk on the south side of the freeway bridge.

Comment B-3:

Reference to Section II. D., Hydrology and Water Quality

The development of this site will increase impervious surface area through the construction of roads, driveways, parking lots, retail center, garages and fuel station with a corresponding increase in surface water (storm water) runoff. This project will decrease surface water detention, retention and infiltration.

Response B-3:

The comment identifies the fact that development of the project site increases the impervious surface area and decreases surface water infiltration. The storm water runoff measures that are included in the project to mitigate the effects of increased stormwater runoff are discussed and evaluated on pages 48 through 50 of the Draft EIR. . The project storm drainage system will be designed and constructed so that there will be no increase in peak flow runoff volume or velocity entering the City's storm drainage system. As noted in the Draft EIR, the size of the detention basin will be increased from its existing capacity of 4.64 acre feet to 8.53 acre feet which will accommodate a 100-year storm event. The detention basin will be designed and function in a manner as to avoid the creation of a pond or standing water in excess of ± 24 hours.

Comment B-4:

Reference to Section II. D., Hydrology and Water Quality

It is stated in the Draft EIR that the design storm used by the engineer for storm drain design is the 10-year return event. It does not indicate where surface water in excess of the 10-year event will be discharged. Caltrans standard for introduction of off site surface water to the highway right of way (R/W) is to not allow any increase in discharge for the 100-year return event. The EIR indicates the existing detention basin size and capacity will reduce the post project discharge to the State's R/W for the 100-year to the pre-project discharge rate, then please provide documentation indicating this. Also, please identify the proposed runoff pattern and outfall.

Response B-4:

As indicated in the DEIR, the project on-site storm drainage system was preliminarily designed to convey 10-year flood flows from the site. Under the preliminary storm drain design, runoff from more intense storm events would be allowed to back up at the storm drain inlets and result in temporary surface ponding to depths not exceeding one foot. The ponded water would eventually enter the on-site storm drain system and be conveyed off-site. In the event of very intense storm events, such as the 100-year storm, ponded water exceeding this depth would be allowed to leave the site at topographical low points created at the site boundary.

In response to the above comment from Caltrans, the project engineers have revised the preliminary design for the on-site storm drain system such that, during the 100-year event, there will be no overland drainage release of stormwater into the I-5 right-of-way. The project hydrological reports have been revised by Robert A. Karn & Associates to reflect the 100-year storm drain design criteria. These revised reports are contained in Section V. *Revisions to the Appendices of the DEIR*. The report entitled *Hydrology Calculations for On-site Storm Drain*, dated June 21, 2005 as revised through December 29, 2005, includes an exhibit entitled *Watersheds and Outfall* that shows the proposed runoff pattern and outfalls.

As discussed on page 49 of the DEIR, the off-site detention basin has been designed to accommodate up to 100-year runoff volumes from the western on-site drainage area of the project site. The hydrology report on the detention basin design, also prepared by Robert A. Karn & Associates, has been added to the EIR and is contained in Section V. *Revisions to the Appendices of the Draft EIR*.

To reflect the changes which have been made to the on-site project storm drain design, Section II. D. *Hydrology and Water Quality* of the DEIR has been revised as appropriate. These text changes are contained in Section IV. *Revisions to the Text of the Draft EIR*. Since the design changes only involve modifications to routing of storm drainage and pipe sizes, no new significant impacts would result from these design changes.

Comment B-5:

Reference to Section II. D., Hydrology and Water Quality

Any increases of discharge into the State drainage system must be mitigated. Runoff must meet the Regional Water Quality Control Board (RWQCB) water quality standards prior to entering the State right of way or drainage facilities. No net increase to the surface water (storm water peak runoff discharge – 100 year storm event) within the State right of way and drainage facilities may be realized as a result of the completion of the project. Best Management Practices (BMP) systems should be included to remove objectionable pollutants and to manage storm water prior to discharge into the State right of way. Once installed the property owner must properly maintain these systems. The proponent/developer may be held liable for future damages due to impacts for which the adequate mitigation was not undertaken or sustained. Acceptable constituency levels and appropriate BMP information can be obtained from the RWQCB.

Response B-5:

The water quality mitigation requirements discussed in this comment are addressed on pages 50 through 53 of the Draft EIR. The EIR identifies comprehensive erosion control and water quality

pollution prevention measures to be implemented during the demolition, site clearing, grading, and construction phases, along with the procedural and reporting requirements of the State Water Resources Control Board (SWRCB) and RWQCB. The EIR also identifies structural and non-structural BMPs to reduce nonpoint source pollutants after the project is completed and operational. As required, the project will meet the RWQCB standards in effect within the City of Willows. (It should be noted that neither the City of Willows nor Glenn County have yet been designated as being subject to the Phase II NPDES Municipal Stormwater Permit program, so the numerical criteria for treatment of runoff which apply to larger urbanized jurisdictions are not applicable to this project. However, the project would be required to implement a combination of BMPs which produce runoff quality meeting the water quality standards of the Regional Board's Basin Plan.) While the DEIR enumerates a number of measures that are typically applied to minimize water quality impacts during and after project construction, the specific measures will be identified by the project engineer in conjunction with grading plan submittal, and will reflect the best combination of measures to meet the water quality objectives given the on-site conditions and project characteristics. The measures will be subject to approval by the City Engineer. The specific BMPs to be applied to this project will be specified in the Storm Water Pollution Prevention Plan (SWPPP) required by SWRCB, which will also be subject to the approval of the City Engineer.

With respect to runoff rates and volumes, both the on-site drainage system and the off-site detention basin have been designed to accommodate flows from the 100-year event, as discussed in Response B-5. As such, there will be no net increase in peak flow runoff to the state right-of-way and drainage facilities. Both the on-site and off-site elements of the project drainage system will be maintained by Wal-Mart. The off-site detention basin will be maintained by Wal-Mart in accordance with a maintenance agreement with the property owner.

Comment B-6:

Reference to Section II. D., Hydrology and Water Quality

The DEIR states a 6 pump (12 station) gas station will be included in the project. The proposed gas station is to be located at the southwest corner of the project site immediately adjacent to SR-162. No information was provided regarding collection and treatment of site runoff from this gas station. Please provide this information.

Response B-6:

The subject of runoff from the fuel station site is discussed on page 53 of the DEIR, which states: "...water quality controls would include inlet filters in the storm drain inlets. The runoff from the canopy over the pumps would be channeled to downspouts and filtered prior to entering the storm drain system."

Comment B-7:

Reference to Section II. D., Hydrology and Water Quality

Existing drainage patterns must be perpetuated, maintained or improved. Pre- and post project hydrologic/hydraulic calculations showing the coverage quantities for buildings, streets, parking and landscape areas should be supplied for review. Please request these calculations and send them to Mr.

Mike DeWall, District 3 Hydraulics Branch at the address in Marysville for review prior to final project approval. Mr. DeWall can be reached at (530) 741-4056.

Response B-7:

The revised drainage report *Hydrology Calculations for On-Site Storm Drain* includes *Table 2 - Pre and Post-Development Acreages* that identifies the requested acreages. Pre-and post project hydrologic/hydraulic calculations are contained in this report. (The revised report is contained in Section V. *Revisions to the Appendices of the DEIR*. The reader is also referred to text changes to EIR hydrology discussion contained in Section IV. *Revisions to the Text of the Draft EIR*, in this document.)

Comment B-8:

Reference to Section II. H., Traffic and Circulation

Page 104, Impact and Mitigation H1a.: We concur with the proposed mitigation that traffic signals should be installed on SR-162 (Wood Street) at North Airport Road, the southbound I-5 ramps and the northbound I-5 ramps in conjunction with the proposed project.

Response B-8:

Comment noted. No response is required.

Comment B-9:

Reference to Section II. H., Traffic and Circulation

Page 104-105, Impact and Mitigation H1b.: Improvements made at the Pacific Avenue-Enright Avenue/Wood Street (SR-162) can be expected to provide improvements to the local street operations.

Response B-9:

Comment noted. No response is required.

Comment B-10:

Reference to Appendix H., Traffic Report

Page 368, Figure 14, Cumulative Plus Project Conditions, Queue Lengths: Some of the storage lengths are optimistic for the cumulative conditions. For the westbound right to southbound I-5, there would have to be widening just west of the structure to provide the storage indicated. Based on the projected queuing, there will still be adequate storage for demand. The same issue arises at the eastbound left to Humboldt. Please clarify.

Response B-10:

The transportation consultants for the EIR – Omni-Means – measured the storage lengths from aerial photographs. The storage lengths indicated took into consideration an appropriate portion of the taper where both through and right/left turning vehicles could sit astride each other while waiting in the queues, even in the absence of pavement striping. Since the manner in which queues would actually develop would depend on many factors including the comfort of individual drivers, a best attempt was made to determine reasonable “average” conditions. Based upon observations of queuing lengths of similar conditions, it is the professional judgement of the traffic engineer that the lane widths and lengths proposed would provide sufficient storage.

Comment B-11:

Encroachment Permit Required

All work conducted in the State’s highway ROW will require an encroachment permit. For more information and to secure an application, please contact the Office of Permits at (530) 741-4403.

Response B-9:

Comment noted. No response is required.

C. RESPONSES TO COMMENTS FROM THE CALIFORNIA DEPARTMENT OF TRANSPORTATION (CALTRANS), DIVISION OF AERONAUTICS, DATED OCTOBER 28, 2005

Comment C-1:

It is difficult to determine from the information provided in the Draft Environmental Impact Report (DEIR), however, it appears that the gas station shown in Figure 5 may be located within the Runway Protection Zone (RPZ.) As we stated in our July 26, 2005 comment letter, airport safety zone and compatible and incompatible land uses must be thoroughly addressed in the DEIR. The DEIR should have included a detailed site plan depicting the safety zones for the Willows-Glenn County Airport and specifically the RPZ dimensions with respect to the gas station.

Response C-1:

Although the RPZ is plotted on the Conceptual Site Plan, it is very faint and difficult to discern. (Note: The RPZ is called 'Clear Zone Safety Area' in the County's Airport Comprehensive Land Use Plan.) The DEIR contains a detailed evaluation of airport compatibility on pages 24 and 25, and includes an evaluation of the location of the Clear Zone Safety Area relative to the project. The DEIR discussion states that the Clear Zone Safety Area extends into the western portion of the site for a distance of no more than 25 feet. (An enlarged detail of the site plan, showing the location of the RPZ relative to the project site is included in Chapter IV of this document.) The DEIR discussion also states that the portion of the site within the Clear Zone Safety Area is planned exclusively for landscaped setback area. The nearest planned gas pumps are at least 60 feet east of the eastern edge of the RPZ.

In this context it is important to note that the Glenn County Planning and Public Works Agency, which serves as staff for the Airport Land Use Commission (ALUC), found that the proposed Wal-Mart expansion project is consistent with the County's Airport Comprehensive Land Use Plan (CLUP), in accordance with a previous finding by ALUC that the original General Plan and Rezoning action for the Wal-Mart project was consistent with the CLUP. (These matters are discussed in detail in the County's consistency letter, which is included as Appendix B in Volume I of the DEIR.)

Comment C-2:

The RPZ is the most critical of the airport safety zones, considered to be "very high risk" due to its proximity to the end of the runway. The RPZ together with the inner safety zones encompass 30% to 50% of near-airport aircraft accident sites. Airport safety zones are established for a reason. While the chance of an aircraft injuring someone on the ground is historically quite low, an aircraft accident is a high consequence event. To protect people and property on the ground from the risks of near-airport aircraft accidents, some form of restrictions on land use are essential. The two principal methods for reducing the risk of injury and property damage on the ground are to limit the number of persons in an area and to limit the area covered by occupied structures.

Response C-2:

Please refer to Response C-1 above.

Comment C-3:

Public Resources Code, Section 21659, "Hazards Near Airports Prohibited" prohibits structural hazards near airports. The planned height of buildings, antennas, and other objects should be checked with respect to Federal Aviation Regulation (FAR) Part 77 criteria if development is close to the airport, particularly if situated within the runway approach corridors. To ensure compliance with FAR Part 77, "Objects Affecting Navigable Airspace," submission of a Notice of Proposed Construction or Alteration (Form 7460-1) to the Federal Aviation Administration (FAA) may be required. For further technical information, please refer to the FAA's web site at <http://www1.faa.gov/ats/ata/ATA400/oeaaa.html>.

Due to the proximity of the project site, the guidance in FAA's Advisory Circular 150/5370-2E, Operational Safety of Airports During Construction, should be incorporated into the project design in order to identify any permanent or temporary construction-related impacts (e.g., construction cranes, etc.) to the airport imaginary surfaces. This advisory circular is available at <http://www.faa.gov/ARP/publications/acs/5370-2e.pdf>.

Response C-3:

Comments noted. The project applicant will be required to submit a "Notice of Proposed Construction or Alteration (Form 7460-1)" to FAA, prior to site development. The project applicant has stated that the guidance in FAA's "Advisory Circular 150/5370-2E" will be incorporated into the project design and construction documents.

Comment C-4:

The protection of airports from incompatible land use encroachment is vital to California's economic future. Willows-Glenn County Airport is an active airport with approximately 57 based-aircraft and over 33,000 annual operations. Willows-Glenn County Airport is an economic asset that should be protected through effective airport land use compatibility planning and awareness. Although the need for compatible and safe land uses near airports in California is both a local and a State issue, airport staff, airport land use commissions and airport land use compatibility plans are key to protecting an airport and the people residing and working in the vicinity of an airport. Consideration given to the issue of compatible land uses in the vicinity of an airport should help to relieve future conflicts between airports and their neighbors.

Response C-4:

Please refer to Response C-1 above.

D. RESPONSES TO COMMENTS FROM THE CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD – CENTRAL VALLEY REGION, DATED SEPTEMBER 15, 2005

Comment D-1:

Construction Stormwater Permit.

Based on the project description, it appears that grading or other soil disturbing activities may occur. In order to protect water quality during development activities, appropriate stormwater pollution controls should be implemented when construction activities occur. If construction activities result in a land disturbance of one or more acres, the project will need to be covered under the General Construction Stormwater Permit (Order No. 99-08-DWQ). The permit requires that a Stormwater Pollution Prevention Plan (SWPPP) be prepared prior to construction activities. The SWPPP is used to identify potential pollutants (such as sediment and earthen materials, chemicals, building materials, etc.) and describe best management practices that will be employed at the site to eliminate or reduce those pollutants from entering surface waters. The Construction Stormwater Permit is administered by the State Water Resources Control Board (State Board) and the Regional Water Quality Control Boards (Regional Boards).

Response D-1:

All of the regulatory requirements related to water quality protection that are applicable to the project are discussed on pages 51 through 53 of the DEIR, which addresses all of the points made in the comment. Mitigation Measure D3 states that a Storm Water Pollution Prevention Plan (SWPPP) will be provided, which will meet the requirements noted in the Comment.

E. RESPONSES TO COMMENTS FROM THE GLENN COUNTY DEPARTMENT OF PUBLIC WORKS, DATED OCTOBER 19, 2005

Comment E-1:

Reference to page 12 – Access and Circulation

Right in & right out will cause most of the fast food clients to exit west and flip a “U” at the signal in order to get back to the freeway. This may create additional movements at the intersection and confusion. Is there a better way to configure this arrangement?

Response E-1:

It has been established that neither a traffic signal, nor the allowance of outbound left turns, will be possible at the main Wood Street entrance due to signal spacing, capacity, and safety considerations. If the Wood Street access were reconfigured such that only inbound right-turns were permitted at the driveway and all exiting traffic were forced to exit onto North Airport Avenue, no U-turns from the project would occur at the Wood Street/North Airport Avenue

intersection. However, as discussed in the DEIR and traffic report, it is recommended that signage be provided on site which is strategically placed such that vehicles exiting the gas station and fast food restaurant can clearly see them. These signs would direct traffic heading to Wood Street and I-5 to the driveway on North Airport Avenue. Although some vehicles will still exit via the Wood Street driveway and make the U-turn described, in the professional judgement of the traffic consultant these will likely be minimal with proper on-site signage. The City Engineer has reviewed the findings of the traffic consultant and concurs with the conclusion that the on-site signage will reduce this impact to a less-than-significant level.

Comment E-2:

Reference to page 14 – Grading and Drainage

14,000 C.Y. of material was removed from the site during the original construction causing the S.W. corner to experience intermittent flooding. This area should be raised with the construction of the new filling station and I would caution the removal of an additional 26,000 C.Y. with the new construction. Also, only the very eastern portion of the original project was allowed to drain directly into the main Wood Street storm drain with the remainder being routed to the detention basin. The intent was that all future development drainage would be taken to the detention basin and metered into the main Wood Street drain. This concept should be followed for the proposed development.

Response E-2:

According to Karn & Associates, the gas station site is proposed to be elevated by approximately one foot above the existing grades. This increase in elevation will allow the site to drain under a 10 year and 100 year rainfall event.

The proposed 26,000 cy of export material is generated by a grading and drainage design for currently undeveloped areas of the site which conforms to the existing grading in the developed portions of the site. In addition, the grading calculation considers that the planned finish floor elevation of the new Wal-Mart store will be elevated approximately one foot above the existing ground elevation.

The on-site drainage system has been redesigned to direct the entire increase in 100-year storm runoff generated by the expanded project, including the gas station, to the detention pond via the storm drainage system in North Airport Avenue. This is discussed in the revised drainage report *Hydrology Calculations for On-Site Storm Drain* contained in Section V. *Revisions to the Appendices of the Draft EIR*, and summarized in the revised EIR hydrology discussion, which is contained in Section IV. *Revisions to the Text of the Draft EIR*, in this document.

The site grading and utility plan has been designed to mitigate the difference between pre- and post-development for the 10- and 100-year storm events. The supporting calculations are contained in *Table A – Eastern Watershed Flow Rates* in the revised drainage report *Hydrology Calculations for On-site Storm Drain*. The project has been designed such that all storm runoff in excess of the pre-development flow rates will be conveyed to the enlarged detention basin.

Comment E-3:

Reference to page 46 – Site Drainage

Incorrect – The southerly and westerly watersheds both drain to the junction box which regulates whether it's allowed to go directly to the main storm drain or is diverted to the detention basin. All additional drainage should be directed to the detention basin and the basin should be enlarged accordingly.

Response E-3:

According to Karn & Associates, the southwesterly (southerly) watershed was connected directly to Wood Street with the construction of the original Wal-Mart. Under the current proposed project, the southwesterly watershed will be combined with the western watershed and the storm runoff from this combined drainage area will be conveyed to the detention pond. (For a full description, see the text changes to EIR hydrology discussion contained in Section IV. *Revisions to the Text of the Draft EIR*, in this document.

Comment E-4:

Reference to page 47 – Flooding Potential

I'm not sure what the Glenn Colusa Canal flood zone on the west side of I-5 refers to.

Response E-4:

The area subject to 100-year flooding on the west side of the Glenn-Colusa Canal is shown on Figure 4-1 of the City of Willows General Plan, as well as Figure 3-7 of the Glenn County General Plan. Both figures are based on the Flood Insurance Rate Map (FIRM) for the area.

Comment E-5:

Reference to page 48 – Impact D1

Instead of “velocity” of peak runoff it should say “discharge.”

Response E-5:

Comment noted and acknowledged. The EIR has been revised to reflect the suggested text change. (See Section IV. *Revisions to the Text of the Draft EIR*.)

Comment E-6:

Reference to page 50 – Impact D

As previously mentioned, the S.W. corner of the site should be raised with the construction of the new filling station since this is the area that typically experiences standing water during heavy storms.

Response E-6:

The project civil engineer has indicated that the gas station site will be elevated by approximately one foot above the existing grades, in conjunction with implementation of the proposed grading and drainage plan. This increase in elevation will allow the site to drain under a 10-year and 100-year rainfall event. The on-site drainage system has been designed to direct all stormwater from the western portion of the site, including the fuel station site, to the off-site detention pond via the storm drainage system in North Airport Avenue. As noted in the DEIR, the 100-year runoff generated in the eastern portion of the site will drain directly to the City's storm drain in Wood Street, which has sufficient capacity to accommodate this flow.

Comment E-7:

Reference to page 83 – Transit Systems

End of middle paragraph should indicated downtown Willows not Oroville.

Response E-7:

Comment noted. The text of the EIR has been revised to indicate that the bus continues either to Chico or the Public Works Building, depending on schedule. (See Section IV. *Revisions to the Text of the Draft EIR.*)

**F. RESPONSES TO COMMENTS FROM CLAIR ARANO, GINTER & BROWN REALTY,
DATED SEPTEMBER 29, 2005**

Comment F-1:

As an Orland Resident and City Planning Commissioner, I am concerned about the proposed expansion of the Willows Wal-Mart store into a "Supercenter." Not only will the expansion impact Willows, but Orland as well. Our newly-formed Economic Development Commission is working diligently with the planning commission and local business to keep everyone afloat while seeking additional businesses to our community.

If Wal-Mart is allowed to replicate downtown Willows on the interchange at 162 and I-5, not only will the last drop of lifeblood be sucked from downtown Willows, but from Orland as well.

Response F-1:

The economic impact report prepared by Sedway Group, which is included as Appendix C to the DEIR, includes a thorough analysis of the potential effects of the Supercenter on existing businesses in Willows. The economic analysis, which is summarized on pages 27 through 32 of the DEIR, concludes that three businesses in Willows are at risk of potential closure as a result of the Supercenter. The market area that was studied comprised all of Glenn County, and data contained in the Sedway report shows the level of economic impact that can be expected in areas of the County outside of Willows. A brief summary of the data is provided below, along with a brief discussion of impacts.

The two main retail categories of concern are general merchandise and food sales. The Sedway report (in Exhibit 12) indicates that the Supercenter is estimated to result in an average sales reduction of 23.6 percent for competing food stores in Willows, and an average reduction of 21.4 percent for competing general merchandise stores in Willows. Based on data contained in Exhibit 11 of the economic report, it can be deduced that for stores located in the remainder of Glenn County, the Supercenter will result in an average sales reduction of about 25.4 percent for competing food stores, and an average reduction of 25.7 percent for competing general merchandise stores, or about 25 percent for both categories.

A 25 percent reduction in business can be substantial to small businesses, which comprise the vast majority of the businesses affected. However, the effects are unlikely to be distributed equally among all affected businesses. The effects of the Supercenter on individual stores will vary depending on several factors, including: comparability with items sold at Wal-Mart, price competitiveness, distance from Wal-Mart, existing financial health of the competing retailer, and other differentiating factors such as service and ability of affected businesses to reposition themselves in the marketplace in the face of increased competition. Thus it is more likely that the effects will be concentrated among a few businesses, which would be at greatest risk of closure. Should these businesses close, the remaining stores would experience lesser impacts, such that they would be able to remain in business.

Due to the relatively large number of businesses in the County (including Orland) that could be potentially affected to some extent, it is not possible to identify with any degree of certainty which specific businesses may be subject to potential closure. For example, there are dozens of stores in the County which sell general merchandise. Similarly, there are 34 existing food outlets

in all of Glenn County, of which about two thirds are located outside Willows. One of these stores, Holiday Quality Foods in Orland, is a moderate-sized supermarket of about 25,000 square feet. Since this is the only supermarket serving the northern portion of Glenn County, it is unlikely that it will close in the face of competition from the proposed Supercenter which will be 15 miles away. Groceries are by nature a convenience shopping good, thus the majority of such shopping occurs at places proximate to shoppers. While shoppers in the Orland area are likely to be periodic shoppers at the Supercenter given the draw of low pricing and variety, they are still highly likely to conduct a large share of their weekly grocery shopping close to home, at the conveniently located Holiday Quality Foods in Orland. Given the large number of remaining small stores and the multiple variables that would affect the specific level of impact on each store, any attempt to draw further conclusions regarding impacts from the data available would be speculative.

It should also be emphasized that the economic impact analysis in the EIR was prepared for the sole purpose of determining the potential for physical impacts, specifically the potential for physical deterioration and urban decay due to long-term building vacancies, which could be shown to indirectly result from the Supercenter. Environmental documents prepared under CEQA are not required to evaluate non-physical impacts, such as loss of revenue, loss of jobs, or similar effects, unless there is a potential that they may indirectly result in physical impacts. However, such socio-economic effects, in and of themselves, are not recognized as impacts under CEQA in the absence of resulting physical effects.

Comment F-2:

According to UC Berkeley's Labor Center Briefing Paper, Wal-Mart workers rely on public assistance to shore up their wages and health needs. In essence, the taxpayer is subsidizing Wal-Mart by picking up the gap in wages and medical insurance.

The wage base for our entire area will see a downturn because so many of the Wal-Mart workers earn little more than minimum wage, and very, very few workers are "full-time." Since Wal-Mart considers anything more than 28 hours in a week as full-time, most of the workers are working part-time, and as such are in need of the safety net of welfare, free lunches, subsidized housing and MediCal.

Response F-2:

Wages and benefits of workers are not issues which are to be addressed in EIRs under CEQA. As mentioned in earlier responses, environmental documents prepared under CEQA are required to solely address physical impacts, including physical impacts which can be shown to indirectly result from economic impacts, such as urban decay which might result from building vacancies. Purely social issues which have no demonstrable causal relationship to physical impacts are specifically precluded from analysis in environmental documents prepared under CEQA, because they are socioeconomic affects which in and of themselves do not result in impacts to the physical environment. Therefore, no further response is necessary or required.

G. RESPONSES TO COMMENTS FROM LORRAINE BAIRD, DATED OCTOBER 26, 2005

Comment G-1:

I am totally against Wal-Mart becoming a Super Wal-Mart store. A few years ago, I shopped at the Chico Wal-Mart and was surprised to find the same items I bought in Willows were more expensive here. I asked the store manager why the price difference and was told each store could price items according to what the local population could bear. I was told if I "didn't like the Willows prices," I "could just shop in Chico." I asked about our Seniors and lower income families, and was told, "I guess if they can't get to Chico, they'll just have to pay our prices."

If the Super Store comes in, the prices will be lower, until they drive our local businesses out, then you can bet they'll increase their prices.

As for Wal-Mart bringing in more people, shopping Willows, is a laugh. Yes, people come to town, get off the freeway and go to Wal-Mart, not downtown.

Do not allow Wal-Mart to ruin our town.

Response G-1:

Comments noted. These comments do not address the Draft EIR specifically, nor do they raise any new issues under CEQA which have not been addressed in the EIR. As such, no further response is necessary or required.

H. RESPONSES TO COMMENTS FROM GLADYS M. BETTENCOURT, DATED OCTOBER 29, 2005

Comment H-1:

Glenn County needs Wal-Mart Supercenter. They provide services that are not available to the citizens, especially the senior citizens who can't drive because of poor eyesight or too feeble, whereas they can take a taxi if they want to shop for the following: affordable groceries, yardage, men's department, ladies' ready-to-wear, children's department, shoe department, ceramics, electronics (mainly TVs), large nursery, curtains, bedding, households (coffee pots, microwaves, etc.).

The above are not available in Glenn County. Please approve. Approve the EIR. Thank you.

Response H-1:

Comments noted. These comments do not address the Draft EIR specifically; nor do they raise any new issues under CEQA which have not been addressed in the EIR. As such, no further response is necessary or required.

I. RESPONSES TO COMMENTS FROM SUZY BOYD ET AL., DATED OCTOBER 31, 2005

Comment I-1:

We already have a Wal-Mart store here. As Stacey Mitchell said in her presentation delivered in St. Croix Falls, Wisconsin, on October 8, 2003: "Just because it builds a new Supercenter it doesn't mean people are going to need more gallons of milk or pairs of socks. Unless this town is experiencing astronomical population or income growth, it's impossible to absorb one of these giant stores without causing sales to decline sharply at the existing businesses, some of which will be forced to close altogether."

These existing businesses have been here for years, some for generations. They and their families have supported this city and its community. They have been able to survive with this Wal-Mart but not be able to compete with this Supercenter. Products, those that for the majority come from China or other low-wage places for low production costs.

"Wal-Mart concedes that when it comes to town, it's out to eliminate competitors. Any store it opens can crush our local groceries, pharmacies, hardware stores, clothiers and other retailers not being more efficient, but by slashing its prices below what it pays for the products. And when it's over, when the local competitors are bled to death, this Wal-Mart store's prices rise. Wal-Mart isn't a job creator for our communities. By crushing local businesses, this giant eliminates three decent jobs for every two poorly paid, part-time, high-turnover Wal-Mart jobettes that it creates. It is an extractor of community wealth, not a creator. This Super Store will sit like a giant tombstone sucking up local money and channeling it to Bentonville." (Jim Hightower, Thieves In High Places, 2003.) We already see this pricing now, as you can go to the Wal-Mart in Chico and find the same item for less than at the Willows store.

I ask you to take into consideration just some of the information I have been able to compile over this short period of time. A very good Web Site is The Institute for Local Self-Reliance based in Minneapolis (www.ilsr.org). I ask you to please read the attached UC Berkeley Labor Center's August 2, 2004 report on the Hidden Cost of Wal-Mart jobs and the speech made by Stacey Mitchell author of The Home Town Advantage, which I have also included with this plea to take a good hard look as to the reality of what will happen if we let Wal-Mart expand its doors.

We are not alone, it is coming out more and more in the news about cities who are fighting to keep out the Wal-Mart and other Big Box Stores and their super centers. For just a few, Fresno, Auburn, Eureka, Grass Valley, North Auburn, Reedley, San Francisco, San Juan Capistrano, Santa Maria, Santa Rosa, Simi Valley California. And this list goes on as you look at what is happening through out the rest of the United States. If they are worried about protecting their community shouldn't we?

Response I-1:

Comments noted. The general point made in the first paragraph is supported by the findings of the economic impact report prepared for the Draft EIR, in that it is likely that sales at existing businesses will decline and some businesses will be at risk of closure as a result of the Supercenter. (See discussion on pages 27 through 32 of the DEIR, and the economic impact report in Appendix C of the DEIR.)

The points raised in the subsequent paragraphs express opinions of the commentator and others with respect to business practices and their outcomes. These comments do not address the Draft EIR specifically, nor do they raise any new issues under CEQA which have not been addressed in the EIR. As such, no response to these points is required.

The attached UC Berkeley report discusses working conditions and social issues which are socio-economic issues and not within the analysis of impacts to the physical environment that are within the purview of CEQA.. As mentioned in earlier responses, environmental documents prepared under CEQA are required to solely address physical impacts, including physical impacts which can be shown to indirectly result from economic impacts, such as urban decay which might result from building vacancies. Purely social issues which have no demonstrable causal relationship to physical impacts are specifically precluded from analysis in environmental documents prepared under CEQA.

J. RESPONSES TO COMMENTS FROM JON S. HAYS, DATED OCTOBER 20, 2005

Comment J-1:

When Wal-Mart came to our community they claimed they would draw out of town shoppers into local business and keep local shoppers at hope. Wal-Mart also promised to solve our unemployment problem and to increase our sales tax revenues tremendously.

My question is simple. Is Willows better off than before Wal-Mart arrived? I think not.

We have lost pet stores, garden stores, jewelry stores, clothing stores, farm stores and much more when you consider the families who lost their livelihoods, dreams and futures as these stores closed.

Please stop this expansion before they completely consume our community. I hate to envision a day when we will advertise: Welcome to Willows – Visit our Wal-Mart.

Response J-1:

Comments noted. These comments include information and opinions which relate to the Wal-Mart project. However, they include no comments on the Draft EIR specifically, nor do they raise any new issues under CEQA which have not been addressed in the DEIR. As such, no further response is necessary or required.

K. RESPONSES TO COMMENTS FROM CINDY HOLDER, DATED OCTOBER 29, 2005

Comment K-1:

My name is Cindy Holder, I have been a resident and have worked in Willows for over 30 years. I understand that a Wal-Mart Supercenter is going to be developed where the existing Wal-Mart is now.

I am not trying to stop development, the existing Wal-Mart does support most of our needs as it is in our community, but putting a third grocery store in this town is bad planning. I am all for competition, but leave Wal-Mart the way it is, and bring in something new to our community that is going to fill another niche, then something that is going to drive out the businesses that are already here.

I worked 18 years as a waitress at minimum wage only 15-25 hours weekly, no benefits, trying to support two children, though I wasn't proud, I needed public assistance for medical coverage for myself and my children. When Wal-Mart first came to town, and was hiring, I applied. My thought was they were going to bring jobs and more opportunities to our community, offering benefits and room for advancement. I wasn't the only one of my fellow co-workers that went to apply, and had an interview with Wal-Mart. Wanting more hours, and a chance for benefits would not only make my quality of life better, but also for my children. I was told I was better off where I was, as was my co-workers told also. Leaving that interview left me feeling defeated. I thought they were here to help people and give them an opportunity for a better quality of life and to help our county by getting people like me off public assistance. I like many, thought wrong! I continued working as a waitress for four more years until I was hired by Sani-Food Market. Within three months, I was hired on full-time (40 hours per week) with benefits. Not only medical, but dental, vision, sick leave and vacation pay. My quality of life improved dramatically. I disagree with Mr. Lino when he says wake up this is Willows, no one makes more than minimum wage. Believe me a lot of citizens in this community make more than minimum wage and do have benefits.

Response K-1:

Comments noted. These comments include opinion and personal information but do not address the content of the EIR specifically or any other issues of concern under CEQA.

Comment K-2:

I do not believe that according to the EIR that only 24 percent of sales will be taken away from the two existing grocery stores. I truly believe there will be a bigger impact on both these stores then the report suggests.

Response K-2:

Comment noted. The evaluation of potential economic impacts, including the estimate of lost sales by the food stores, was prepared by Sedway Group, a highly qualified and respected economic consulting firm. Since the commentator does not offer any analysis or data in support of her opinion, it is not possible to respond in a meaningful way. The City stands behind its conclusions in the EIR.

Comment K-3:

In case downsizing or closure happens because of the Supercenter, you are going to see far more people out of good paying jobs with benefits, into the unemployment lines and seeking public assistance, then you really expect. I myself will be one of them. If I want to stay and work in Willows, I will have to go back to being a waitress, part-time at minimum wage, no benefits. My quality of life will once again change dramatically. This time for the worse. I guess I could look for employment in Chico, but a new hire, I will not be assured of a full-time (40 hour) job, wages I'm making now or benefits. Plus I will have the added expense in gas, having to commute each day. I will not only have to start out at minimum wage, but at the bottom and work my way up again to where I am now. With the economy and job market as it is, I find myself at 48 years old and seeing that impossible.

Response K-3:

Comments noted. However, they include no comments on the Draft EIR specifically, nor do they raise any new issues under CEQA which have not been addressed in the DEIR. As such, no further response is necessary or required.

Comment K-4:

I also feel the impact on the tire stores, value stores, fuel stations, and other existing downtown businesses will be far more greater then expected or suggested in the DEIR.

Response K-4:

The comment expresses the personal opinion of the commenter. No specific evidence is presented in the comment to support the opinion regarding the referenced socio-economic analysis for which a response can be provided. The City stands behind the Economic Report prepared by Sedway Group.

Comment K-5:

I also feel that the Socio-Economic Analysis of the proposed Supercenter that Wal-Mart rejected shows a more realistic impact on our community then the EIR that was submitted.

Response K-5:

The comment expresses the personal opinion of the commenter. No specific evidence is presented in the comment to support the opinion of greater impacts for which a response can be provided.

Comment K-6:

The DEIR speaks more on the environment and CEQA standards and barely touches on the impacts of the socio-economic factors.

Response K-6:

As discussed in the DEIR and in prior responses, the purpose of CEQA is to analyze the potential impacts of a project on the physical environment. Socioeconomic impacts are generally not within the scope of analysis in an EIR. The California Environmental Quality Act and the CEQA Guidelines are quite clear that socio-economic issues are to be discussed in environmental documents only if such effects would indirectly result in physical impacts. In the case of a project which has the potential to cause existing stores to close, an economic impact analysis is required if there is evidence to show that the project could initiate a chain of events which could ultimately result in physical deterioration of buildings and properties, or urban decay. In other words, such an analysis is only necessary to establish whether or not a significant physical impact has the potential to occur. The analysis of any other kind of socio-economic effect, such as potential effects on working conditions or incomes, without a demonstrable connection to a resulting physical impact, is not required or necessary under CEQA.

Comment K-7:

The Supercenter is not going to stop people from still going to Chico for their shopping needs. You will still be able to go to Chico and get your groceries cheaply. You will still be able to go to Chico/Sacramento and get your electronics, appliances, furniture, fuel and vision products cheaper and may I add better quality. Instead of a bunch of inferior products, you end up throwing away or sitting around your house, because Wal-Mart will not take them back, and you can't afford after buying it, to send a TV back to the factory, or the cost to take it to the dump. Maybe Wal-Mart should have a dump station, for people to take their products and have them dump them for us.

Response K-7:

Comments noted. No response is necessary or required.

Comment K-8:

If bigger cities and communities are fighting to keep Wal-Mart Supercenters out of their towns, because of loss of businesses and jobs, then why are we allowing it to happen to us? For every two jobs Wal-Mart creates, three are lost, and most of those are going to be good paying jobs with benefits like mine. Are you prepared for this?

I urge you to look closely at the September 15, 2004 Wall Street Journal article "Wal-Mart's Surge Leaves Dead Stores Behind." I don't want this to happen to our community. I don't want to see other stores close or left behind, my friends or family lose. I don't want my shopping choices taken away, where the Supercenter is my only choice in this town to shop. You will then force me and many others to then go to Chico for shopping choices. Where's your revenue now.

Response K-8:

Again, these comments mainly relate to jobs and individual shopping choices, neither of which is a recognized topic of discussion under CEQA.

Regarding the reference to the Wall Street Journal, the article cited in the comment actually addressed the practice of Wal-Mart and other large retailers to vacate their existing stores when moving into larger spaces. In some localities it is difficult to sell or release this space, resulting in long-term vacancy of the former store building. In the case of the Willows Wal-Mart, the existing store will be demolished once the new store is completed, as is clearly described in the DEIR, so this is not an issue of concern here.

L. RESPONSES TO COMMENTS FROM EARL AND PAT HOOPS, DATED OCTOBER 30, 2005

Comment L-1:

We live in the Willow Glenn RV and Mobile Home Park where there are mostly retired people on fixed incomes. Therefore most of us want the Super Wal-Mart to come in. Some reasons are:

- 1. It will lower prices more to our benefit.*
- 2. It will be within a short distance for those of us who will soon be too old to drive much longer.*
- 3. We believe that in time by the City and the other established businesses and new businesses to come in will help our tax base and present more jobs.*
- 4. We need to work together to draw outside people to come to our town. We can do that by sending letters, advertise via billboards, word of mouth.*
- 5. Our downtown area is in bad shape. New ideas of some kind could come through a committee of people who are knowledge wise to make us grow.*
- 6. Like one of the guests at this meeting (the 10/28/05 meeting at the Round Table) stated, we need to improve the appearance in the downtown. Offer an appealing beautiful open area that will want to be seen by tourist and other counties. (Make specialty shops would help bring them in.)*
- 7. A slogan posted at the freeway entrances of our two places could alert the travelers that we have what they want.*
- 8. We could present an attraction by having a wild wild west theme and follow through with buildings that have things like the Joy Shop does.*
- 9. Craft stores, candy stores or factory, entertainments of plays, park BBQ or parades more often. Street fairs a couple of times a year downtown.*

We believe that the Super Store would help this community. Be a drawing point for other businesses to come in also, we need to let families be able to build. We realize that it is hard to make changes in one's life. But if we are to survive, we need to grow. Making maps of what we have to offer will help bring people into this town. Some buildings could be made into consignment booths.

Response L-1:

Comments noted. These comments are supportive of the Wal-Mart project and offer a number of suggestions as to how to improve the downtown area. However, these comments do not address the Draft EIR or raise new issues under CEQA. As such, no further response is necessary or required.

M. RESPONSES TO COMMENTS FROM VIOLA M. LEDERER, DATED OCTOBER 31, 2005

Comment M-1:

The DEIR does not speak for the Willows residents who welcome a Wal-Mart Superstore. Willows residents who presently shop out of town (Chico) will stay here. When Willows brings in more specialty and diversified stores, Willows will grow. The key to growth is community input and new ideas.

The “no growth” in downtown Willows began when the buildings on Sycamore, Butte and Tehama Streets were torn down. The “Fathers” then did not have a vision. New landlords in the area raise rents and do not upgrade or update the buildings. Holiday Store has not upgraded the store, some Butte Street storefronts are unattractive and the Old Theatre (Tower) and lot are a disgrace. New developers need incentives to come to Willows.

Revenues will increase with the Superstore. If Willows rejects the Superstore, it will be welcomed to the north or south of Willows and residents will travel there or to Chico. Other towns and cities near I-5 are growing – “baby boomers” who are retiring are looking for rural areas to settle; why not Willows?

Will Willows challenge itself with new growth, new ideas and new life, or will Willows stay in its comfort zone of no growth.

Response M-1:

Comments noted. These comments express support for the project and contain general opinions regarding past and future growth in Willows. The letter contains no specific comments on the Draft EIR, and it does not raise new issues under CEQA. As such, no further response is necessary or required.

N. RESPONSES TO COMMENTS FROM MARIANNE MADARIAGA, DATED OCTOBER 22, 2005

Comment N-1:

I would like the Planning Department, the Willows City Council and anyone else involved in the Wal-Mart Superstore decision to vote no on the issue. Willows has some wonderful, small, family-owned businesses. The existing Wal-Mart fills many of the gaps in available merchandise accessible to us. If the Superstore comes in I'm afraid of the closure of our smaller businesses. I do not want to live in a town where one store has all the commerce. Please don't let that happen.

Response N-1:

Comments noted. These comments express opposition to the project, particularly out of concern that some smaller businesses may close due to the Supercenter. The Draft EIR contains a detailed discussion of businesses at risk of closure due to the Supercenter on pages 27 through 32. The letter contains no specific comments or criticism regarding the economic impact analysis in the DEIR. As such, no further response is necessary or required.

O. RESPONSES TO COMMENTS FROM JOHN D. MINNEIAR, DATED OCTOBER 26, 2005

Comment O-1:

I am wholeheartedly in favor of Wal-Mart expanding to form a Super Store. I have lived here for 33 years and am now retired. Without the low prices of Wal-Mart, I don't know what I would do.

Response O-1:

Comments noted. This letter expresses general support for the Wal-Mart project, but contains no specific comments on the Draft EIR. As such, no further response is required.

P. RESPONSES TO COMMENTS FROM HOOVER H. MOCK, DATED OCTOBER 30, 2005

Comment P-1:

As a long time resident of this community I am voicing my opposition of a Super Wal-Mart Mega Store in Willows.

Willows is going to grow as the population continues to come northward. Willows is an ideal place for business, manufacturers, and other industries to come because of the location in the heart of the North-South corridor of Interstate 5. My concern is what a mega store will do to the downtown business community when it does grow.

The downtown business area will not grow now without some major removal of eyesores such as the Tower Theatre and the Daughtry Building. It needs a major anchor store to start the development of the downtown area. What anchor store will come into Willows with a Super Wal-Mart located next to I-5? The downtown business community will continue to dwindle because the hub of new businesses will be along I-5 and Wood Street.

In the 50's Willows was a very attractive town. The population was just over 4,500 residents but had 5 automobile dealerships, 3 tractor dealers, 2 lumberyards, 4 hardware stores, 3 drugstores, 5 grocery store, 6 clothing stores, 2 jewelry stores, 3 cleaners, and much more. We had a downtown. Willows fathers decided to improve downtown area with the Downtown Redevelopment Project that destroyed much of Willows old landmarks and the unique small businesses in the downtown area.

I have been involved with the Willows Chamber of Commerce, Willows Rotary, the committees formed to study the growth of businesses since the late 60's, 70's, and 80's. In my heart I have always felt that Willows business will grow back to where it was in the 50's.

After Wal-Mart came to Willows they were not part of the community as promised. They did not donate to any local organizations to help raise monies to their cause until the past two years when they wanted to put a Super Wal-Mart in Willows. Wal-Mart is the corporation that is concerned with the bottom line.

I have read much on the effect of Wal-Mart and Super Wal-Mart have on areas that they have located throughout our nation. They will, in the long run, destroy the Willows business community with their ruthless practice of "Low Price" merchandise. The practice of hiring part-time employees with little or no benefits with minimum pay will still be a burden to society. Wal-Mart provides health benefits to only half the employees.

Wal-Mart's continued practice of buying goods made overseas with cheap labor have destroyed American's proud "Made in U.S.A." industry. Wal-Mart has upset the economic chain of business in the United States.

The infrastructure of any community is paid for by generated tax dollars. It is true that Super Wal-Mart will generate a larger tax base for the City. But eventually it will cease to become a revenue, but a burden to the community.

But it will be better if we can turn monies earned in Willows 4 or 5 times at different businesses to generate that tax dollar and provide decent jobs for its residents. Or spending it at a Super Wal-Mart and sending it out of state?

What major business anchor and other businesses will come to downtown Willows when they must compete with a Super Wal-Mart.

I urge you to vote against a Super Wal-Mart in Willows.

Response P-1:

Comments noted. This letter expresses general opposition to the project, discusses Willows' past and future growth, and offers opinions on Wal-Mart's business practices and the general effects of Wal-Mart upon Willows' ability to attract other businesses. However, the letter contains no specific comments on the Draft EIR; nor does it raise any new issues under CEQA. As such, no further response is necessary or required.

Q. RESPONSES TO COMMENTS FROM DEBBIE OWEN ET AL., DATED OCTOBER 25, 2005

Comment Q-1:

The DEIR indicates that an estimated \$2.6 to \$3.7 million of general merchandise sales may be diverted from existing merchandise stores, equivalent to support for approximately 13,000 to 18,500 square feet of general merchandise store space, assuming performance of \$200 per square foot. Due to the increased capacity and enhanced variety of goods to be available, the Super Center Store will be more competitive than the current Discount Store. Other stores will be impacted as well, but this negative impact on existing stores will depend on their ability to sustain a temporary downturn in sales. The report indicates it is difficult to identify which general merchandise stores are at greatest risk of potential closure.

We concur that the Super Center Store will adversely impact existing retail stores and accept the \$2.6 to \$3.7 million sales diversion and inferred reduction in retail space use at 13,000 to 18,500 square feet. We also concur that it is difficult without further interaction, assessment, and evaluation to determine

which stores have the ability to sustain themselves when sales decrease. However, we do not believe that downturn in sales will be temporary, but rather will remain at less than current levels for the life of the Super Center. Thus the adverse impacts will likely be chronic, affecting existing and emerging retailers in the long term.

Response Q-1:

Comments noted. Sedway Group acknowledges that the term “temporary” was inadvertently included in the report and does not belong there. The text of both the Draft EIR and the Sedway report in Appendix C have been revised to delete references to temporary impacts. (See Section IV. *Revisions to the Text of the Draft EIR* and Section V. *Revisions to the Appendices of the Draft EIR.*) These revisions will not alter the remainder of the analysis or conclusions of the economic impact discussion.

In this context, it should be noted that the economic report only considered historic rates of population growth in Willows and Glenn County, which are both less than one percent. Based on this very low growth rate, it cannot be asserted that sales levels would return to current levels in a few years due to general growth in the area. However, in recent years there has been a significant increase in proposals and applications for residential development projects in Glenn County, as discussed in detail in Response Q-2 below. If even a portion of these projects are actually developed, the resulting population growth would potentially help local businesses make up for sales which may be lost to the proposed Supercenter.

Comment Q-2:

We do not concur with the Sedway Group’s conclusions regarding the potential for urban decay. It is their contention, based primarily on telephone interviews with local real estate professionals and visits to properties (Holiday Quality Foods, 99-Cent with Value, Safety Tire Service) most impacted by the Superstore, that due to the improving and expanding retail activities in the City of Willows, the loss of these businesses would not result in long-term vacancies or un-maintained, blighted properties. This analysis fails to consider the adverse impacts of the Supercenter on long-term retail opportunities, and assumes that the existing market characterization, defined on page 26, as moderate demand for small retail and office space, will continue unaffected by the reduction in downtown retail activities caused by the Supercenter. Thus the adverse impacts will likely be more severe and chronic leading to additional urban decay and blight within the City of Willows.

Response Q-2:

According to Sedway Group, the Supercenter may have an adverse impact on some existing establishments, as discussed in their report (and as summarized in the Draft EIR). However, Sedway Group stands behind their characterization of overall market conditions in Willows, before and after completion of the Supercenter. It is noted that having a larger, stronger store will help support a critical mass of retail and other commercial establishments, drawing more people to Willows in general. This can help buoy overall markets in Willows. While downtown Willows is approximately one mile east of Wal-Mart, there is the potential for shoppers seeking goods not available at the Supercenter to shop elsewhere in Willows. This would be more convenient than driving to a totally different shopping destination, especially given that Willows is already the County’s shopping hub, achieving 51 percent of all County sales (in 2003) with less than 25 percent of the population.

In addition, , if additional residential development in the area is constructed, the residents of those homes could provide additional support of local small businesses. The City expects to receive a revised development application for a 400-unit subdivision on the property south of the Colusa-Glenn Canal and east of I-5, and also had preliminary discussions with development interests concerning land immediately east of the City limits. There has also been considerable pre-development activity in the City of Orland where development applications for approximately 1,200 residential units have been received, and some of these new dwellings have been constructed. Additionally, Glenn County is currently processing an application for an approximately 1,150-unit project west of Artois, and has had predevelopment discussions on several other large potential projects in the Artois area. All of this development activity has arisen in the past two or three years, and more proposals are expected. In light of this trend, it appears that Glenn County is about to enter a period of substantial residential growth. While an increase in local growth rates cannot be quantified with specificity, since few projects have yet received approval, the proposed developments provide a strong indication that growth rates will rise substantially. Such growth would potentially help local businesses make up for sales which may be lost to the proposed Supercenter.

Comment Q-3:

In summation, we believe the DEIR minimizes the local retail sales and urban decay impacts and reject the tacit assumption that these impacts are best left to passive marketplace adjustments. We therefore urge a more responsive and responsible analysis of these impacts, which contain specific actions for mitigating the anticipated long-term reduction in retail sales and the anticipated vacancy of commercial properties that will result from this loss of retail sales.

We assert that an acceptable Environmental Impact Report must contain specific programs for mitigating these understated adverse impacts. Such a program should include: A) a more concise measurement (survey) of businesses anticipating impacts, B) quantification of each business' needs, capacity for change, and willingness to address competitive issues, C) provision of resources, technical assistance, and financial programs to address their needs, and D) development of organizational capacity to network and provide services in an efficient and comprehensive manner.

Response Q-3:

Comments noted. Each of the itemized points is addressed in turn below:

A) Without having access to private business information and a survey of consumer shopping behavior, it is not possible in a study of this nature to specifically identify to a greater extent which stores may be more negatively impacted than others. There are no publicly available data sources that contain reliable estimates of store sales data. Some fee-based resources have estimates while others have data believed to be actual, reported by the individual businesses, but these are the exception rather than the rule. Moreover, even if sales data are available, an independent observer cannot determine the level of profitability of a business without insight into operational costs, including overhead. Thus conclusions in reports like the economic impact analysis of the Willows Supercenter are primarily based on qualitative observations and judgements of experienced economic professionals.

B) Surveys of existing businesses have limitations as data sources; knowing that the nature of the queries will inevitably influence the responses provided, i.e., businesses are self-motivated, and will often provide answers that are most favorable to their business operations, regardless of their

veracity. In addition, businesses do not always correctly anticipate the nature of impacts generated by new high volume retail establishments – businesses can often be helped by the additional traffic volume generated by the high volume retailer just as much as others can be hurt by diverted sales. The retail components added by the Supercenter which are most unique to the Willows retail market will be the grocery and auto-oriented components. The estimated impacts of these components are documented in the Sedway Group report. For the other uses, only an expansion of the store is anticipated, with a broader mix of the same types of goods available. It is likely that impacts due to the sale of these types of goods were already experienced when the Wal-Mart store first opened in Willows. Thus stores remaining in operation have managed to adapt to the heightened competition. However, stores achieving marginal operations may experience some impacts, as discussed in the Sedway Group report.

C) As noted in the Draft EIR, no physical impacts are anticipated to result from the economic effects of the project. As such, no mitigation is required under CEQA. Environmental documents prepared under CEQA are not required to address economic or social impacts unless there is evidence that physical impacts will follow as a result. The economic impact report prepared by Sedway Group concludes that there is no evidence that physical deterioration or urban decay will result from the project.

D) This point is similar in nature to the point made in item C in that it calls for mitigation of economic impacts. As noted in the response to item C, no such mitigation is required since there is no evidence that physical impacts will result from the economic effects of the project.

R. RESPONSES TO COMMENTS FROM DEBBIE OWEN, UNDATED

Comment R-1:

I am writing this letter as a concerned citizen, tax payer and small business employee. I am concerned about the demise of our already in trouble downtown area. Citizens realize that we need development in Willows, but why can't we find a business that won't pose such a threat to the already existing small business. Please try to see my points and read between the lines on the EIR report and possibly not accept this.

Response R-1:

Comments noted. This letter contains no specific comments on the Draft EIR, nor does it raise new issues under CEQA. As such, no further response is necessary or required.

S. RESPONSES TO COMMENTS FROM EDNA ROBERTS, DATED OCTOBER 5, 2005

Comment S-1:

I have some concerns that I do not feel were properly addressed in the economic review of the project due to the unique situation I feel we have in Glenn County. I also believe that a document (Safety Tire letter) was missing from one of the appendixes from the environmental impact review study.

Response S-1:

As noted on page xxi of the Draft EIR, a comment letter in response to the Notice of Preparation (NOP) was received from Safety Tire Service after the close of the 30-day comment period for the NOP. The City's intent was to include a copy of the letter in Appendix A of the Draft EIR; however, it was inadvertently omitted from the document along with the letter from PG&E. The EIR has been amended to add both of these letters to the document. (See Section V. Revisions to the Appendixes of the Draft EIR).

Comment S-2:

The economic review only took in the Willows City area for the impact of this expansion. I do not feel this is adequate, fair or the proper way to address this project. I feel the entire Glenn County should have been in the economic impact review as the entire County of Glenn will be affected. I love this small home town Rural Americana atmosphere that have in Glenn County. I have read about many communities across the United States that have embraced growth while keeping their rural small town feel within their communities. I think with proper planning and development we can have both as well.

Because we enjoy our small communities in Glenn County (not just Orland and Willows) and many want to preserve them, I am asking for additional economic impact studies for the entire County, not just the City of Willows. I would like to see a committed plan in place for the economic stability and growth of our existing small businesses, prior to the ground breaking of the proposed Wal-Mart expansion. Lack of economic prosperity is not new to all of Glenn County and this could be the right time to address this long standing issue for everyone. If all Chambers of Commerce, all Economic Development Agencies, all City representatives, and all redevelopment agencies could pool their resources together in regards to economic issues facing current businesses, much could be accomplished. If we want to preserve our small towns that are relatively in close proximity to each other within the County, we need to look at ourselves on economic issues as a whole. I think by competing against each other economically has been quite detrimental to the businesses we have had in the past and the businesses currently struggling to survive now. We have several smaller communities/villages not being taken into account in what they have to offer as far as potential services, assets, and resources to make this County an even greater place to live. It might also be a potential way to lower the unemployment rate we are constantly fighting in the County. Having commercial stability and planned growth might also help the astronomically high residential property taxes that have been seen in the county this past year. I don't think anyone wants to see Glenn County strictly as a residential area. I know current residents cannot pay for needed city or county services by residential property taxes alone, which seems the road we are taking.

I am asking the City of Willows to ask for a new economic impact study with the boundary area being the entire Glenn County...If a new study can be done encompassing the entire county, maybe the Board of

Supervisors should be consulted on some level. (See Comment S-3 below for the intervening sentences in this part of the comment letter which address a different subject.)

Response S-2:

Comments noted. The comment requests economic information regarding the remainder of Glenn County, not just Willows. Please refer to Response F-1 which addresses the economic impacts to areas outside of Willows.

Regarding the comment in the second paragraph which calls for planning for the economic stability and growth of existing small businesses, it is not appropriate under CEQA for an environmental document on a specific project to address the need for general policy initiatives or programs. The reader is also referred to the discussion in Response Q-3 regarding economic mitigation measures.

Comment S-3:

I am for a proposed expansion, but would also like to see the option of a smaller project explored more fully, prior to a final decision. This was one of the options named in the environmental impact report but was not elaborated on.

Response S-3:

The assertion that the Draft EIR did not evaluate a smaller project alternative is not correct. The detailed analysis of the "Reduced Project Size Alternative" can be found on pages 159 through 162 of the Draft EIR. The size of this alternative project is about midway between the existing Wal-Mart store and the proposed Supercenter. It is not clear exactly what the commentator means by "smaller project," but consideration of an alternative smaller than the one presented in the EIR would not be meaningful or required since such an alternative would be very close in size to the existing store, which is represented in the No Project Alternative. Therefore, the Draft EIR contains and evaluates alternatives that represent a "reasonable range of alternatives" as required under CEQA.

**T. RESPONSES TO COMMENTS FROM BOB SAINT-EVENS, SAFETY TIRE SERVICE,
DATED OCTOBER 27, 2005**

Comment T-1:

As previously stated in my last letter, I think a Wal-Mart Supercenter will hurt Willows more than help it. There will be a definite economic impact on what retail businesses are left in the community, especially in the downtown area where vacancy rates are presently quite high.

Then there is the "multiple" effect, such as loss of businesses may result in loss of property tax revenue, loss of rental income, etc. I purchase as much locally as I can from the local auto parts store, grocery stores, hardware store and specialty shops. My insurance agent is local, as my dentist is local. I try to support our town.

I have many loyal customers. If I close they may choose to go to Chico or elsewhere. This may lead to other businesses being affected, not just those listed in the survey.

If Safety Tire was to close, it would cost three employees plus a part-time bookkeeper their jobs. Wal-Mart's hiring practices of 4-hour days, no overtime, no benefits for some employees, would not be equivalent to what they now earn.

What is Wal-Mart going to add to the community? Will it advertise locally in the media? Will the store manager live in Willows?

Response T-1:

Comments noted. These paragraphs include general opinions regarding Wal-Mart's economic impact upon existing businesses in Willows. Since these do not include specific comments on the Draft EIR, no response is necessary or required.

Comment T-2:

After reading the Environmental Impact Report indicating that Safety Tire Service was at the greatest risk of closing, which I did not appreciate, I have never considered closing my 40 year old business. If I was planning on selling my business, the Environmental Impact Report could be very damaging. If Wal-Mart does become a super center then my tire business may not seem like a good business for someone to purchase.

Sedway suggests that my empty building would not lead to general deterioration of the area. If I do not have a viable business income, I will not be able to insure, pay taxes or maintain my empty structure. This will have the same effect on other property owners, as well. How will Willows look with boarded and broken windows, graffiti, perhaps arson opportunities?

It is ridiculous that a business invest several thousands of dollars for new equipment, such as a smog machine, car wash, as suggested by Sedway. It would be absurd to indebt my business with such an expense, when Wal-Mart will most certainly provide similar services.

Response T-2:

Comments noted. The Sedway report states that even if Safety Tire Service were to close, the owners could be expected to at least maintain the structure to the extent of preventing physical deterioration. It was assumed that the current and long-time owners would have an incentive to maintain the building in a condition suitable for leasing or sale.

However, if a worst-case scenario is assumed, the following events could occur. Assuming that the Safety Tire Service could potentially close due to competition from Wal-Mart's Tire and Lube Express, and assuming the current owner is unable to lease or sell the property in the foreseeable future, the building could stand vacant for a considerable period. In the absence of a business income, it is assumed that the owner would lack the resources to provide minimal maintenance of the vacant building. Under this scenario, the critical question becomes whether the building would deteriorate physically and result in urban decay. In considering this question, it is important to note that the Safety Tire Service building is clad with corrugated metal siding and roofing and, being at least 50 years old, it shows its age but does not have a run-down

appearance. There are other similar vacant buildings in the immediate vicinity which date from about the same period. While these buildings may also be weathered and showing their age, they are not physically deteriorated, and certainly do not exhibit any of the characteristics which define urban decay (e.g., “impairs proper utilization of the properties or structures, and the health, safety and welfare of the surrounding community;” characterized by “...long-term unauthorized use of properties and parking lots, extensive gang or graffiti painted on buildings, dumping of refuse or overturned dumpsters on properties, dead trees or shrubbery and uncontrolled weed growth or homeless encampments”), as enumerated on page 28 of the DEIR and page 25 of the Sedway Group’s report in Appendix C. It is therefore reasonable to conclude that, even if the Safety Tire Service building was left vacant and unmaintained for an extended time period, it is unlikely that the building would be subject to significant physical deterioration such that the property could be characterized as being in a state of urban decay. Further, given that the surrounding properties have survived being underutilized and vacated for extended periods without significant physical deterioration, it is highly unlikely that the vacancy of the Safety Tire Service building would suddenly initiate a chain of events resulting in the urban decay of this part of Willows. Based on the foregoing considerations, the City stands by the urban decay analysis and conclusions presented in the Draft EIR.

Comment T-3:

As far as remediation of this facility, there are no environmental issues that need to be addressed. The tire shop was previously a beer warehouse. There are no typical auto business issues, such as oil drains, tanks or spills.

Response T-3:

Comment noted and acknowledged. The absence of environmental contamination issues would make potential rehabilitation and reuse of the building less problematic. The two sentences on page 32 of the Draft EIR which discuss the potential for environmental contamination issues have been removed from the DEIR, and the corresponding statements in the Sedway report have also been deleted. (See Section IV. *Revisions to the Text of the Draft EIR* and Section V. *Revisions to the Appendices of the Draft EIR.*)

Comment T-4:

It is just like Pacific Municipal Consultants to use a cookie cutter approach to Willows. Such as the definition of “Urban Decay.” That definition works well in a large urban area, but that is a matter of degree. What is insignificant in Inglewood, California IS significant in Willows, California.

Response T-4:

Since Environmental Impact Reports are prepared in order to fulfill legal reporting and analysis requirements under CEQA, they are prepared in strict adherence to impact criteria and definitions contained in the CEQA statutes and Guidelines, as well as any additional guidance provided by the courts. It is important to note that while environmental evaluations under CEQA are required to determine when economic effects of a project may indirectly result in “urban decay” or “physical deterioration,” neither of these terms are clearly defined in CEQA or the Guidelines. As such, EIR preparers must rely on the further definition and clarification of these terms as contained in the case law. Accordingly, the definition used by Sedway is taken directly from

recent published court cases on this point. It would be remiss of Sedway Group, Pacific Municipal Consultants, or the City of Willows to attempt to modify the legally accepted definitions of “urban decay” and “physical deterioration,” as defined under CEQA, when even the courts in most instances have been reluctant to do so.

Comment T-5:

This report fails to access the cumulative report of a Wal-Mart Supercenter to the Business Community. Such as the general appearance of the downtown area, effects of new industry coming to the area because of no businesses in Willows, except for the Wal-Mart. This domino effect will lead to blight.

Response T-5:

The assertion in this comment that the Sedway report does not contain an analysis of cumulative economic impacts is incorrect. The section of the report entitled “Cumulative Impacts” is found on page 24 of the Sedway report in Appendix C of the Draft EIR. In accordance with the requirements of CEQA, the cumulative impact analysis considers the combined effects of the proposed project together with the effects of any other projects which may be proposed in the vicinity, and which may magnify the effects of the proposed project.

The point that the commentator seems to be making is that the Sedway report did not consider the combined effects of the several potential business closures that could potentially result from the project. This issue is discussed at length on pages 27 through 29 of the Sedway report and is summarized on page 32 of the Draft EIR. Sedway’s findings are summarized in the following statement from page 29 of their report: “...although the development of the Supercenter Store may contribute to further retail vacancies in the primary market area (City of Willows), those vacancies are unlikely to result in urban decay because of the favorable conditions for retenanting in most instances.” In other words, Sedway Group found no evidence that such closures would result in a chain of events (or domino effect) which would result in urban decay.

Comment T-6:

Finally, if I do close there will be four empty buildings out of five at the intersection of Colusa and Sycamore Streets.

What happens when there are no more local businesses left?

If you go down memory lane, there once was a lovely town by the name of Willows. Let see, there was the Sears Catalogue Store, a huge Willows Department Store, known up and down the valley, Fitzpatrick Auto Center, Ben Franklin variety store and an A & W Root Beer Stand...

Response T-6:

The comment implies that three of the five buildings at the corner of Colusa and Sycamore Streets are currently vacant. This is not an accurate statement, as indicated below.

Southwest corner – building occupied by Safety Tire Service

Southeast corner – small office/professional building – occupied by unknown user (no exterior identification)

Northeast corner – retail building – largely vacant; partly occupied by All Seasons Screen
Print

– Bernstein Radiator building – vacant

Northwest corner – multi-tenant building – largely occupied by Body Works and Nail Works

Therefore, at the intersection of Colusa and Sycamore Streets, there currently are two fully occupied buildings, one largely occupied building, one partially occupied building, and one vacant building.

The remainder of the comment contains no specific comments on the EIR. Therefore, no further response is necessary or required.

U. RESPONSES TO COMMENTS FROM LAURA SCHAUER, DATED OCTOBER 24, 2005

Comment U-1:

I am enthusiastically in favor of Willows Wal-Mart becoming a Supercenter. For the 13 years that I have lived in Willows I've heard "Growth & Jobs" as the theme from City and County officials. Now, here is a large corporation willing to spend big money to enlarge their store that will (and does) provide "Growth & Jobs" and there is some doubt whether or not we "will let it happen"?

You've heard all the pros & cons, I won't list them again. But I ask you, if you are driving on I-5 going from point A to B, is there any store in downtown Willows for which you would leave I-5 to visit? Wal-Mart, gas stations and fast food restaurants do this for us.

There is room in Willows for quality independent merchants and a Wal-Mart Supercenter – "Growth & Jobs"!

Response U-1:

Comments noted. This letter expresses support for the project and provides general reasons for that support. The letter contains no specific comments on the Draft EIR, nor does it raise new issues under CEQA. As such, no further response is necessary or required.

V. RESPONSES TO COMMENTS FROM SHIRLEY SHUMIN, DATED SEPTEMBER 30, 2005

Comment V-1:

I have lived in Willows for most of my life. I went to school here and have worked all my adult years here. I believe in Willows and its lifestyle, in its innate welcoming goodness and the people who call Willows 'home'. We are interested, intelligent and caring.

I know there have been some expressed concerns about some businesses 'being forced to close down', however, I believe that any business which does close down will do so because they either would have anyway or they didn't want to cinch in the 'profit margin' they'd been used to in order to be competitive.

Response V-1:

Comments noted. These comments contain opinions regarding potential business closures resulting from the project. Since these comments do not specifically address the analysis or discussion contained in the Draft EIR, no response is required or necessary.

Comment V-2:

I believe the 'endangered' species (a hawk) is not limited to the specific site identified for the proposed Supercenter, but rather, the greater central valley.

Response V-2:

It is accurate that much of the Sacramento Valley, including the vacant project site, provides potential foraging habitat for Swainson's hawk, which is the species of particular concern in this area. However, there is no potential breeding (nesting) habitat for this species on the project site, although there are trees within one-quarter mile which could become occupied by nesting Swainson's hawks prior to commencement of project development. This is discussed in detail on pages 63-64 and pages 67-68 of the Draft EIR. The EIR identifies specific measures to be implemented in conjunction with project development, in the event that nesting Swainson's hawks are identified, which will avoid impacts to any nesting Swainson's hawks in the vicinity due to possible nesting disturbance during project construction.

Comment V-3:

But that aside, the monies which Glenn County residents spend in Chico now (especially for food) will be coming back to Willows (and its tax coffers), but only because Wal-Mart will provide beyond what people can imagine but they won't have to drive to Chico to shop. And with the cost of gas being what it is, this is a great incentive to shop local.

I guess what I want to say is: I APPROVE OF THE WAL-MART SUPERCENTER FOR WILLOWS.

Response V-3:

Comments noted. These comments express general support for the project and provide several reasons for this support. No response is required.

IV. REVISIONS TO THE TEXT OF THE DRAFT EIR

This section contains revisions to the Draft Environmental Impact Report for the Willows Wal-Mart Project. Underlining depicts text added while ~~strikeouts~~ depict text removed.

I. PROJECT DESCRIPTION

Page 8 FIGURE 5 – CONCEPTUAL SITE PLAN

On the page following page 8, insert a new exhibit entitled “Figure 5A – SITE PLAN DETAIL SHOWING AIRPORT CLEAR ZONE SAFETY AREA.” This new exhibit appears on the next page of this document.

Page 10 FIGURE 7 – CONCEPTUAL LANDSCAPE PLAN

Replace the existing Figure 7 with revised Figure 7 – CONCEPTUAL LANDSCAPE PLAN (REVISED).” The revised Figure 7 appears on the second next page of this document.

Page 15 Grading and Drainage

In first paragraph, REVISE third sentence as follows:

Roof drainage will be conveyed via downspouts directly to underground storm drains, through which it will be carried to the off-site detention basin described below.

Page 11 Proposed Land Uses

REVISE the fourth full paragraph as follows:

West of the Wal-Mart building within the main project parcel will be a welded steel water tank (32 feet in height and 38 feet in diameter) which will provide storage for fire flows. The tank will be painted a light tan color to match the primary color of the Wal-Mart building. Visual screening for the tank will be partially provided by an 8-foot high masonry block wall as well as a double row of landscape trees to be planted within the setback zone along North Airport Avenue (see Figure 7).

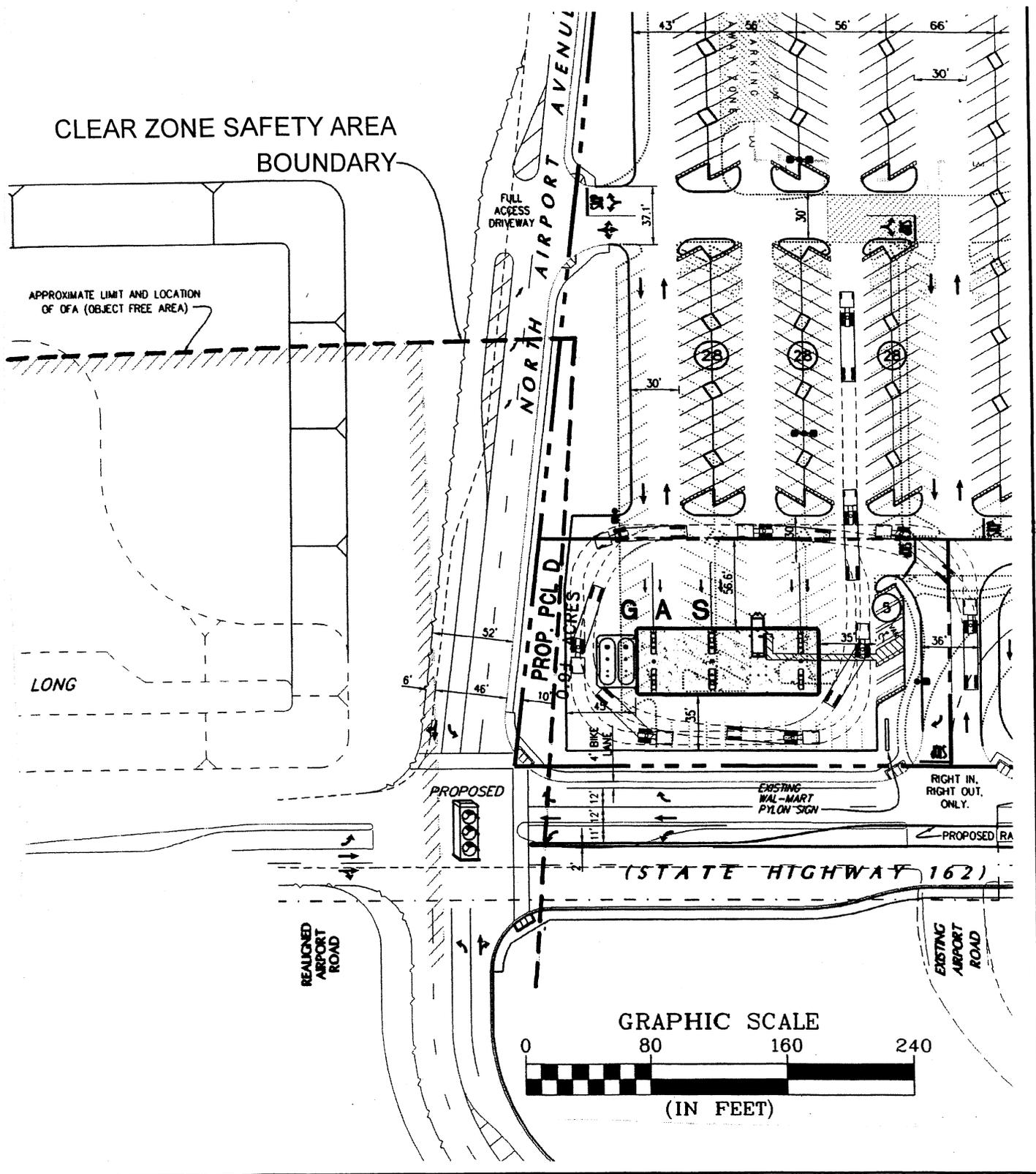
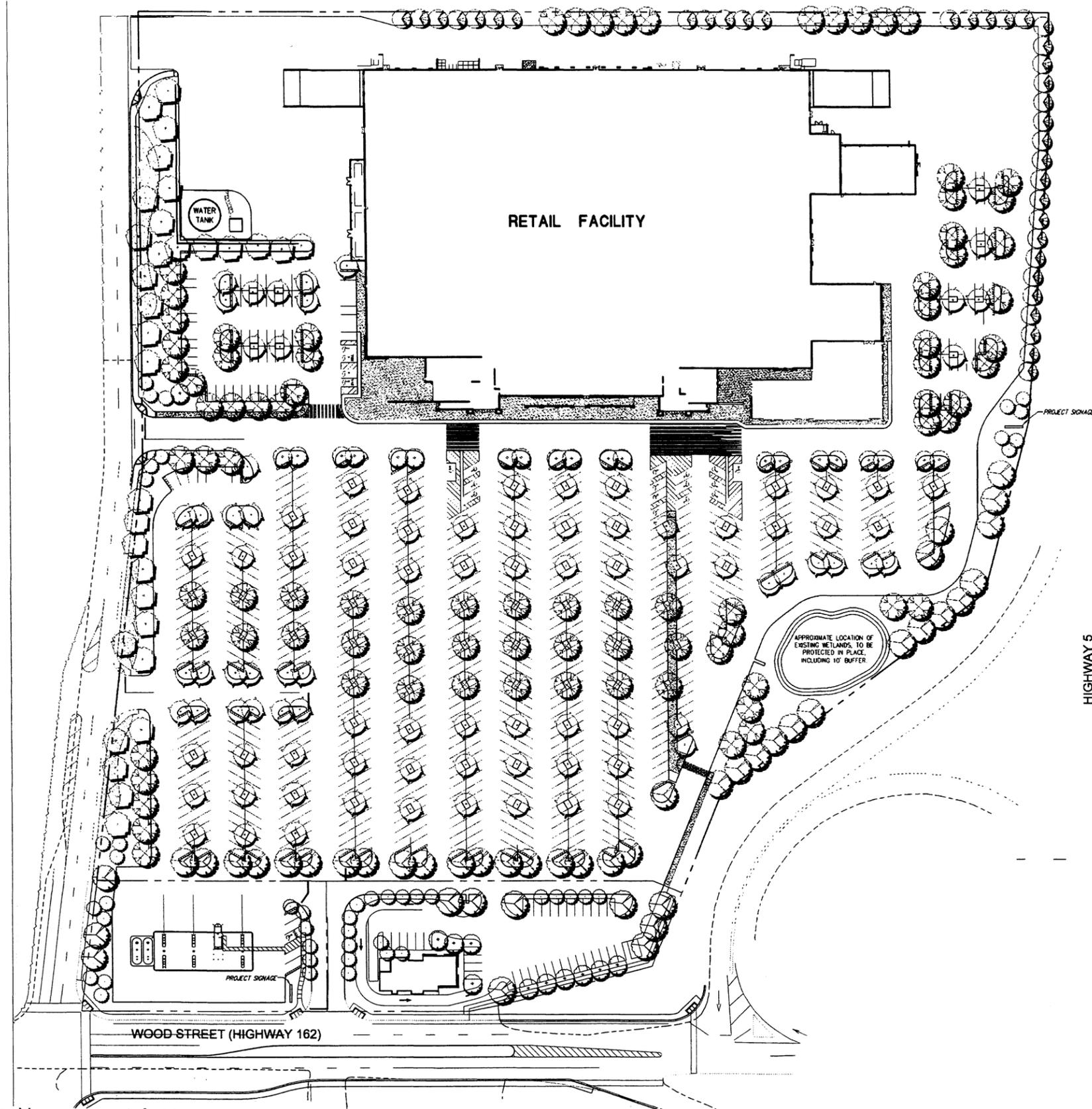


FIGURE 5A
 SITE PLAN DETAIL SHOWING
 AIRPORT CLEAR ZONE SAFETY AREA



TYPICAL TREE LIST

BOTANICAL NAME	COMMON NAME	SIZE
PARKING LOT TREES		
PLATANUS A. 'YARWOOD'	YARWOOD SYCAMORE	15 GAL
ROBINA 'PURPLE ROBE'	PURPLE ROBE LOCUST	15 GAL
LAGERSTROEMIA 'TUSKEGEE'	CRAPE MYRTLE	24" BOX
PERIMETER TREE		
SAPINDUS BIPIPERLUM	CHINESE TALLOW TREE	15 GAL
SCREEN TREES		
SEQUOIA S. 'APTOS BLUE'	APTOS BLUE COAST REDWOOD	15 GAL
ENTRY / ACCENT TREES		
PYRUS KAWAKAMI	EVERGREEN FLOWERING PEAR	24" BOX
ACCENT TREES		
PRUNUS X 'BURLEIGH'	PURPLE LEAF PLUM	24" BOX

TYPICAL SHRUB & GROUNDCOVER LIST

BOTANICAL NAME	COMMON NAME
DWARF TALL FESCUE	TURF
FELICIA BELLOROWANA	PRINCEPLE GUAVA
PROTINIA FRASERI	RED PROTINIA
ERIGERON KARVINSKYANUS	SANTA BARBARA DANDY
ESCALONIA COMPACTA	COMPACT ESCALONIA
GREVILLEA	GREVILLEA
HEMERICALLIS HYBRID (EVERGREEN)	DAT LILY
RAPIHOLEPIS L. 'CLARK'	WHITE RHAPHIOLIS
LAVENDULA X INTERMEDIA 'PROVENCE'	LAVENDER-PROVENCE
HE TENDRILLIS ARBUTIFOLIA	TOYON
NANDINA DOMESTICA 'FIRE POWER'	COMPACT HEAVENLY BAMBOO
NANDINA DOMESTICA	HEAVENLY BAMBOO
YBURNUM TITUS SPRING BOUQUET	SPRING BOUQUET YBURNUM
PITTOSPORIUM T. 'VARIEGATA'	VARIEGATED PITTOSPORIUM
RUSA 'CAMPET ROSE'	GROUNDCOVER ROSES
ROSMARINUS 'TUSCAN BLUE'	TUSCANY ROSEMARY
DIETES BICOLOR	YELLOW FORTNIGHT LILY
DIETES VEGETA	FORTNIGHT LILY
ADAPANTHES AFRICANUS	LILY-OF-THE-PILE
ADAPANTHES AFRICANUS 'PETER PAN'	DWARF LILY-OF-THE-PILE
TRACHELOSPERMUM JARMINOIDES	STAR JASMINE
COL. BOMBAY PULCHRUM	PINK BREATHER OF HEAVEN
LIGUSTRUM J. 'TEXANUM'	TEXAS PRIVET
LANTANA M. 'LAVENDER SWIRL'	CRESPING LANTANA
MYRTLE	MYRTLE
PENNISETUM B. 'TRUBRUM'	RUBRUM FOUNTAIN GRASS
PHORMIUM T. 'MADR'S CHEF'	HYBRID FLAX
PHORMIUM T. 'TOM TUM'	HYBRID DWARF FLAX
PRUNUS C. 'BRIGHT & TIGHT'	CAROLINA CHERRY
WESTRINGEA F. 'MORNING LIGHT'	NON
--- DENOTES DROUGHT TOLERANT PLANT	

PLANTING AND IRRIGATION NOTES

1. ALL PROPOSED PLANTING AREAS TO BE IRRIGATED BY MEANS OF AN AUTOMATICALLY CONTROLLED, ELECTRONIC IRRIGATION SYSTEM AND TO BE DESIGNED TO COMPLY WITH ANY WATER EFFICIENT ORDINANCE.
2. LANDSCAPE AREAS TO BE COMPRISED OF A COMBINATION OF TREES, SHRUBS AND GROUNDCOVER.
3. ALL PLANTING AREAS TO RECEIVE 5" BARK MULCH.
4. LOCATION AND NUMBER OF PROPOSED TREES IS SUBJECT TO CHANGE BASED ON FINAL UTILITY LOCATION.
5. ALL PROPOSED PLANTS ARE SUITABLE FOR ZONES 8 & 9.
6. PROPOSED PARKING LOT SHADE TREE PLANTINGS TO PROVIDE 50% PARKING STALL COVERAGE IN 15 YEARS.
7. WETLAND AREA LANDSCAPE: EXTENT OF WETLANDS AREA LANDSCAPE PER RECOMMENDATIONS OF ANY SITE SPECIFIC WETLANDS REPORTS.

GENERAL NOTES

1. PARKING LOT AND STREET PAVING PER CIVIL ENGINEER.
2. PEDESTRIAN PAVING PER ARCHITECT.
3. PROJECT SIGNAGE PER ARCHITECT.
4. LIGHTING PER LIGHT CONSULTANT.

SOURCE: VANDERTOOLEN ASSOCIATES



FIGURE 7
CONCEPTUAL LANDSCAPE PLAN
(REVISED)

PMC

PACIFIC MUNICIPAL
CONSULTANTS

II. ENVIRONMENTAL SETTING, IMPACTS, AND MITIGATION MEASURES

Page 24 A. LAND USE AND PLANNING

In the last paragraph, CORRECT the last two sentences as follows:

The Clear Zone Safety Area also includes height restrictions based on an imaginary approach surface sloping upward at an angle of 1:20 (horizontal: vertical) from the end of the “Primary Surface” which extends for 200 feet beyond the end of the airport runway. Thus the height limit begins at 0 feet from a point 200 feet north of the end of the runway and gradually increases to 50 feet at the north end of the Clear Zone Safety Area located 1,000 feet to the north.

Page 29 A. LAND USE AND PLANNING

In the last paragraph, CORRECT the last sentence as follows:

The Sedway report states that the extent of impact upon these existing stores will depend on their ability to sustain a ~~temporary~~ downturn in sales and make adjustments to their operations which would allow them to remain competitive.

Page 30 A. LAND USE AND PLANNING

In the last paragraph, CORRECT the last sentence as follows:

In summary, the economic impact analysis by Sedway Group indicates that impacts to business in some retail categories due to competition from the Supercenter may be severe enough to result in or contribute to the closure of several existing businesses in Willows, unless the business owners can sustain a ~~temporary~~ downturn in sales and make adjustments to their operations which would allow them to remain competitive.

Page 32 A. LAND USE AND PLANNING

CORRECT the first full paragraph as follows:

The Safety Tire Service business is located in a large, older warehouse building on the east side of Willows, with under-performing real estate assets nearby. The potential closure of Safety Tire Service could result in long-term vacancy of this building, given its size and lack of suitability for most uses other than another automotive-related business or a warehouse/storage operation. Although the applicable Light Industrial zoning of the site would permit a wide range of light industrial and commercial uses, the reuse of the building would likely require physical

rehabilitation to attract future tenants. ~~In addition, given the long-term automotive-related use of the site, it likely has environmental issues that would need to be addressed prior to reuse. The potential cost of environmental remediation may present an additional deterrent to the potential reuse of the site.~~ Thus it is possible that a long-term vacancy of this building could occur; however, it is believed that the current and long-time owners would keep the building maintained. It is therefore unlikely that the closure of Safety Tire Service and the long-term vacancy of the building would result in physical deterioration of the property itself, or urban decay.

Pages 48-50 **D. HYDROLOGY AND WATER QUALITY**

Revise the discussions for Impacts D1 and D2 as follows:

Impact D1. **Increased Stormwater Runoff.** **The project would result in a substantial increase in stormwater runoff generated at the site compared to existing conditions; however, the existing detention basin would be enlarged to accept the increased runoff, and regulated discharges to the City of Willows storm drain system would avoid downstream flooding and drainage impacts. (Less-than-Significant Impact)**

The project would involve the development of approximately 15 additional acres with buildings, parking area, and roadway, resulting in the coverage of approximately 90 percent of this area with impervious surfaces. This would increase the velocity of peak runoff leaving the site by about 15 cubic feet per second (cfs), and would increase total flood flows generated by the project during the 100-year event to 8.4 acre feet.

The project storm drain system has been designed to collect runoff from the 100-year, 24-hour event from the project development areas and North Airport Avenue. The three existing drainage areas on the site, described above under 'Existing Conditions', will be modified to create two drainage areas, of roughly equivalent size, dividing the site into eastern and western drainage areas. The project storm drain system has been designed such that all 100-year flows from the modified eastern drainage area will be discharged directly into the City's storm drain system in Wood Street without resulting in overland discharge of 100-year flows from the site. Thus there will be no adverse hydrologic or hydraulic impact to the State's existing highway rights-of-way and drainage facilities. In essence, the increases in peak runoff from the easterly watershed will be effectively transferred to the adjacent western watershed, thus eliminating the need for project drainage mitigation measures (i.e., on-site detention) for the peak storm within the easterly watershed.

The western drainage area will be reconfigured such that runoff from this area will essentially include all of the increased flows from the project. The storm runoff from this area (including a portion of roof drainage from the Wal-Mart building) will be conveyed to the detention basin. To accommodate the increased 100-year flows, the storage capacity of the existing detention pond will be expanded from 4.64 acre-feet to 8.43 acre-feet. The pond will continue to drain by gravity through the existing metering structure to the 36-inch storm drain in Wood Street, such that the increase in peak 100-year runoff entering the City's storm drainage system will not result in overland discharge into the State highway rights-of-way.

The surface area of the detention basin will be expanded from 3.52 acres to 5.82 acres. As under existing conditions, it will have side slopes of 6:1 (horizontal: vertical), and will have a maximum water depth of 5 feet, with 1.5 feet of freeboard. The basin will have a 10-foot wide access road and a 10-foot wide landscaped setback area between the edge of the basin and the perimeter fence enclosing the basin site. The detention basin will continue to be located on the Rosolia property with a maintenance agreement with Wal-Mart Stores, Inc. Maintenance activities will include weed abatement and periodic removal of accumulated sediments to maintain hydraulic capacity.

As mentioned, the detention pond will be designed to accommodate a 100-year storm event. During peak storm events, the pond will start out empty, then fill up in +/- 9 hours, and then drain to empty in another +/-15 hours, for a total time of +/- 24 hours. This would not result in the creation of a pond of standing water that would attract birds, and thus would not pose a potential aviation hazard to the Willows-Glenn County Airport.

Since the project storm drainage system will be designed and constructed such that there is no increase in the runoff volume or velocity entering the City's storm drainage system during peak flood conditions, the increased runoff generated by the project will result in less-than-significant impacts in terms of drainage and downstream flooding.

Mitigation. No mitigation required.

Impact D2. Flooding. During the 100-year storm event, the project site may be subject to shallow flooding to depths of less than one foot; however, the building pads would be raised above surrounding ground elevations to prevent flooding within the buildings. (Less-than-Significant Impact)

To facilitate positive site drainage, the building pads will be raised above surrounding finished ground elevations, with grades sloping away from the building pads toward storm drain inlets in the parking areas or along the perimeter of the project site. Although the on-site storm drainage system will be designed for the 100-year event, the project storm drain system has been designed to allow some portion of runoff from large events such as the 100-year storm would pond around the storm drain inlets until the peak runoff has passed through the pipes. This ponding would be very shallow, well under one foot on average, and would be prevented from flowing off-site by project grading design. After the backup has dissipated the ponded stormwater would be conveyed through the underground drainage system to the off-site detention basin, which will have capacity to hold 100-year flood flows. With the planned design of the project storm drain system, the project would not result in significant on-site or off-site flooding impacts.

Mitigation. No mitigation required.

G. AESTHETICS

Under the “Impact G1,” in the second paragraph after the impact statement, ADD the following after the second sentence:

The new water tank to be located west of the main Wal-Mart building may also be visible from State Route 162 (and North Airport Avenue); however, the tank will be partially screened by the 8-foot masonry wall to be constructed to the west and south of the tank. The tank will also be visually obscured by the double row of landscaping trees to be planted within the adjacent setback area along North Airport Boulevard, as well as the landscape trees planted throughout the parking lot. In addition, the height of the tank will not exceed the height of the building parapet, and it will be painted a light tan color to match the primary color of the Wal-Mart building and the masonry screen wall.

H. TRAFFIC AND CIRCULATION

Under the subheading “Wood Street,” in the second paragraph, CORRECT the second sentence as follows:

A single through lane is provided in each direction, along with a two-way center left-turn lane from which vehicles can make eastbound westbound left turns at North Airport Avenue or at the project entrance further to the east on Wood Street.

H. TRAFFIC AND CIRCULATION

Under the subheading “Villa Avenue,” CORRECT the first sentence as follows:

Villa Avenue is a 2-lane north-south roadway which begins ~~in northern Willows~~ at a “T” intersection at Wood Street County Road 48...

H. TRAFFIC AND CIRCULATION

Under the subheading “Butte Street,” CORRECT the first sentence as follows:

Butte Street is a 2-lane north-south collector roadway which begins ~~in northern Willows~~ the north at a “T” intersection with County Road 48, and enters the City limits at Green Street, continues continuing south past Wood Street and terminating at south of Elm Street.

H. TRAFFIC AND CIRCULATION

Under the heading “Transit System,” in the second paragraph, CORRECT the last sentence as follows:

To depart the site, the bus continues northbound along the west side of the store toward the rear of the store, then turns left toward North Airport Avenue, turning left again onto southbound North Airport Avenue en route to Wood Street and continuing either to Chico or the County Public Works Building ~~the return trip to downtown Oroville.~~

H. TRAFFIC AND CIRCULATION

In Tables 4, 6, 8 and 9, ADD the following to Footnote 2:

The acronym TWSC applies to both four-legged intersections with two-way stop control and three-legged (or “T”) intersections with only one stop sign.

J. AIR QUALITY

Under the heading “Health Effects of Pollutants,” CORRECT the first sentence as follows:

The primary air quality problems in the Sacramento San Joaquin Valley Air Basin (Air Basin) are ozone and particulate matter.

J. AIR QUALITY

Under the subheading “Carbon Monoxide,” CORRECT the first sentence as follows:

Carbon monoxide (CO) is a local pollutant in that it only occurs at high concentrations very near the source.

L. UTILITIES AND SERVICE SYSTEMS

Under the heading “Water Supply,” in the first paragraph, CORRECT the last sentence as follows:

The aquifer which ~~with~~ provides water to Cal Water is not in an overdraft condition.

Page 136 **L. UTILITIES AND SERVICE SYSTEMS**

Under the heading “Water Supply,” in the second paragraph, CORRECT the last line as follows:

...with a third connection running off an ~~and~~ existing 12-inch main in Wood Street.

Page 139 **L. UTILITIES AND SERVICE SYSTEMS**

Under “Impact L1,” in the fourth paragraph after the impact statement, REVISE the fourth sentence as follows:

The tank will consist of a 3246-foot high by 3832-foot diameter welded steel storage tank located in a landscaped buffer zone on the west side of the Supercenter building.

Page 145 **M. PUBLIC SERVICES**

In the fifth paragraph on the page, CORRECT the second line as follows:

...where they could be used as daily cover material. (Since this material may be used as...

Page 152 **III. CUMULATIVE IMPACTS**

Under the subheading “Air Quality,” CORRECT the last sentence as follows:

Therefore, cumulative dust emissions would not be considerable, and the project would not contribute to a cumulative dust impact.

Page 155 **IV. ALTERNATIVES TO THE PROPOSED PROJECT**

Under the subheading “Reduced Project Size Alternative,” CORRECT the fifth sentence as follows:

Moreover, one of the applicant’s basic project objectives, as stated in Section *I. C. Project Objectives*, is to construct a facility which ~~with~~ is 193,459 square feet in size...

V. REVISIONS TO THE APPENDICES OF THE DRAFT EIR

This section contains revisions to the Appendices to the Draft EIR for the Willows Wal-Mart Project. Underlining depicts text added while ~~strikeouts~~ depict text removed.

APPENDIX A – NOTICE OF PREPARATION (NOP) AND RESPONSES

The following letters are hereby added to Appendix A the EIR (copies of letters provided at the end of this section):

- Letter from Donald Chambers, PG&E, to Mike Mistrot, Willows City Manager, dated June 28, 2004.
 - Letter from Bob Saint-Evens, Tire Safety Service, to Mike Mistrot, Willows City Manager, dated March 1, 2005.
-

APPENDIX C – ECONOMIC REPORT

Page 2 In the third paragraph, CORRECT the second last sentence as follows:

However, the extent to which this will negatively impact existing stores will depend on their ability to sustain a ~~temporary~~ downturn in sales.

Page 20 In the second paragraph, CORRECT the second last sentence as follows:

However, the extent to which this will negatively impact existing stores will depend on their ability to sustain a ~~temporary~~ downturn in sales.

Page 28 CORRECT the second bulleted paragraph as follows:

- The **Safety Tire Service** business is located in a large, older warehouse building on the east side of Willows, with under-performing real estate assets nearby. The potential closure of Safety Tire Service could result in long-term vacancy of this building, given its size and lack of suitability for most uses other than another automotive-related business or a warehouse/storage operation. Although the applicable Light Industrial zoning of the site would permit a wide range of light industrial and commercial uses, the reuse of the building would likely require physical rehabilitation to attract future tenants. ~~In addition, given the~~

~~long term automotive related use of the site, it likely has environmental issues that would need to be addressed prior to reuse. The potential cost of environmental remediation may present an additional deterrent to the potential reuse of the site. Thus it is possible that a long-term vacancy of this building could occur; however, it is believed that the current and long-time owners would keep the building maintained. It is therefore unlikely that the closure of Safety Tire Service and the long-term vacancy of the building would result in physical deterioration of the property itself.~~

APPENDIX E – HYDROLOGY REPORT

The hydrology report contained in Appendix E of the DEIR is hereby deleted from the EIR and replaced by the following new and revised hydrology reports by Robert A. Karn & Associates. (These reports are included as attachments at the end of this document.)

- *Hydrology/Hydraulics Review (Willows Wal-Mart)*, Revised November 16, 2005.
- *Hydrology Calculations for On-Site Storm Drain – Wal-Mart Store #2053-02, Willows, California*, Revised December 29, 2005.
- *Hydrology Calculations for Detention Pond – Wal-Mart Store #2053-02, Willows, California*, Revised July 9, 2004.

APPENDIX H – TRAFFIC REPORT

P. 5 Third full paragraph, CORRECT the last sentence as follows:

A single through lane is provided in each direction, along with a two-way center left turn lane from which vehicles can make ~~eastbound westbound~~ left turns into the project driveway along Wood Street, as well as to N. Airport Avenue along which additional project driveways are located.

P. 6 Under the subheading “**Villa Avenue**,” CORRECT the first sentence as follows:

Villa Avenue is a 2-lane north-south roadway which begins ~~at its northern point as~~ at a “T” intersection at Wood Street County Road 48...

P. 6 Under the subheading “**Butte Street**,” CORRECT the second sentence as follows:

It begins as a “T” intersection with County Road 48, and enters the City limits at Green Street, continuing ~~continues~~ south past Wood Street terminating at ~~south of~~ Elm Street.

P. 11 First partial paragraph, CORRECT the last sentence as follows

To depart the site, the bus continues northbound along the west side of the store towards the rear of the store, then turns left towards N. Airport Ave., turning left again onto southbound N. Airport Ave. en route to Wood Street and continuing either to Chico or the Public Works Building ~~the return trip to downtown Oroville.~~

APPENDIX L – UTILITIES REPORT

Page 1 CORRECT second paragraph, last sentence as follows:

It then crosses under Interstate 5 and travels southerly on N. Humboldt Ave., then east along W. Sycamore St., and the Sycamore Lift Station, then southerly along S. Villa Ave., easterly along Laurel St., and then southerly along the railroad tracks and arrives at the Wastewater Treatment Plant.

NOP COMMENT LETTERS

The following pages contain the two comment letters on the Notice of Preparation (NOP) which were inadvertently omitted from the Draft EIR. These include NOP comment letters from PG&E and Bob Saint-Evens, owner of Safety Tire Service, Inc.

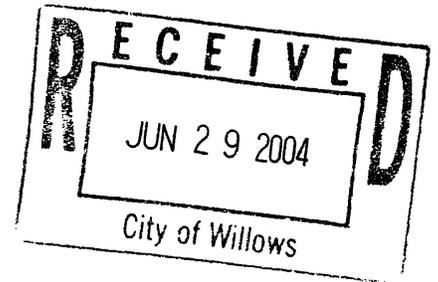


Pacific Gas and Electric Company

460 Rio Lindo Avenue
Chico, CA 95926
530/894-4423
FAX 530/894-4414

Don Chambers
Chico Land Rights Office

June 28, 2004



Mr. Mike Mistrot, City Manager
City of Willows
201 North Lassen Street
Willows, CA 95988

**RE: N.O.P. Draft E.I.R.-(Willows Wal-Mart Project)
Hwy.162 @ I-5**

Dear Mr. Mistrot:

We have reviewed the subject project description.

Pacific Gas and Electric Company (PG&E) has both underground electric and gas facilities in proximity currently serving the Wal-Mart store.

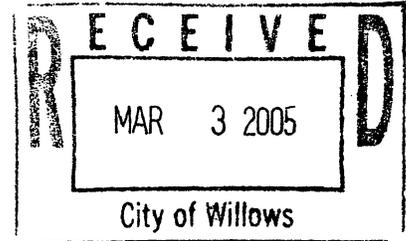
Any relocation or rearrangement of any existing PG&E facilities in this area, to accommodate this project will be at the expense of the developer/property owner. There shall be no building of structures, or the storage of any materials allowed over or under any existing PG&E facilities, or inside any easements that may exist.

In order to adequately schedule the rearrangement of our facilities, the developer needs to contact our Service Planning Department as soon as plans are available. A representative can be reached at 894-4749.

Thank you for the opportunity to review this matter. If you have any questions, please call me in Chico at 894-4423.

Sincerely,

Donald W. Chambers
Land Agent
(file: WllwsWalMart.doc)



March 1, 2005

Mike Mistrot
Manager
City of Willows
201 N. Lassen Street
Willows, California 95988

Re: Walmart Super Center

Dear Mr. Mistrot:

In regards to the City of Willows encouraging a Walmart Super Center to replace the now existing Walmart, I believe it would devastate the remaining portion of downtown Willows. Our town already has two grocery stores, four businesses that sell tires and one hardware store. All of these businesses are trying to survive. As you know a great deal of our city of Willows and Glenn County population shop in Chico.

After doing a little research, I learned that a Walmart Super Center opened and then closed, after the employees decided to strike for better benefits. My point is, do you want Willows to become a "ghost town"?

Sincerely,

A handwritten signature in black ink that reads "Bob Saint-Evens, Jr." in a cursive style.

Bob Saint-Evens, Jr., Owner
Safety Tire Service, Inc.

✓ cc: City Planning Department

VI. COPIES OF COMMENT LETTERS RECEIVED ON THE DRAFT EIR

*The comment letters commence on the following page. The alpha-numeric notations which have been added in the margins of each comment letter correspond to the reference numbers used in Section III. **RESPONSES TO WRITTEN COMMENTS RECEIVED ON THE DRAFT EIR.***

A

DEPARTMENT OF TRANSPORTATION

DISTRICT 3

703 B

P. O. BOX 911

MARYSVILLE, CA 95901-0911

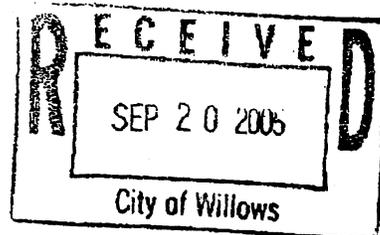
PHONE (530) 741-4025

FAX (530) 741-5346

TTY (530) 741-4509



*Flex your power!
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September 19, 2005

Mr. Mike Mistrot
City Manager/Planning Director
City of Willows
201 N. Lassen Street
Willows, CA 95988

Dear Mr. Mistrot:

Mike

A-1

As of September 22, 2005, the Caltrans single point of contact assigned to work with the City of Willows on local development planning activities is Randy Evans. Randy is available to answer your local development review questions and may be reached at (530) 634-7616, or by e-mail at "randy_evans@dot.ca.gov". Please share this information with your staff and other departments that are involved with local development planning activities.

Please continue to mail all Intergovernmental Review and Local Development Review activities to:

Bruce de Terra, Chief
Office of Transportation Planning – North
Department of Transportation, District 3
P.O. 911
Marysville, CA 95901-0911

Also, this is a periodic reminder that Caltrans should be provided with information regarding any local development proposal that may have an impact on the State transportation system. Providing information to Caltrans early in the development process will allow time for early consultation, saving time and resources for all involved agencies. Whenever possible, electronic sharing of information is advised so faster service may be provided.

Thank you for your assistance. Please call me at (530) 741-4025 if you have any questions.

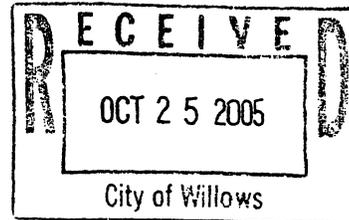
Sincerely,

Bruce de Terra

BRUCE DE TERRA, Chief
Office of Transportation Planning – North

DEPARTMENT OF TRANSPORTATION

DISTRICT 3
 703 B STREET
 P. O. BOX 911
 MARYSVILLE, CA 95901-0911
 PHONE (530) 741-4025
 FAX (530) 741-5346
 TTY (530) 741-4509



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October 24, 2005

05GLE0012
 03-GLE-162, P.M. 65.33
 Wal-Mart Expansion
 DEIR, SCH#: 2004062128

Mr. Mike Mistrot, City Manager
 City of Willows
 201 North Lassen Street
 Willows, CA 95988

Dear Mr. Mistrot:

Thank you for the opportunity to review and provide comments on the draft environmental impact report (DEIR) for the proposed expansion of the Wal-Mart store located on the northwest corner of State Route (SR) 162 and Interstate (I-) 5 in the City of Willows. Our comments on the DEIR are as follows:

Section I., B., Figure 5, Conceptual Site Plan:

- B-1** | • We concur with the proposed change to the existing easterly entrance to Wal-Mart to right in – right out with a raised median on SR 162. This change will eliminate left turns out of the Wal-Mart driveway and moves across the highway from the existing Airport Road.
- B-2** | • We concur that a right turn lane should be constructed on eastbound SR 162 approaching the southbound I-5 on-ramp; since the structure only has sidewalks on south side of the structure the right turn lane should be designed to assist pedestrians in crossing this on-ramp.

Section II.D., Hydrology and Water Quality:

- B-3** | • The development of this site will increase impervious surface area through the construction of roads, driveways, parking lots, retail center, garages and fuel station with a corresponding increase in surface water (storm water) runoff. This project will decrease surface water detention, retention and infiltration.
- B-4** | • It is stated in the Draft EIR that the design storm used by the engineer for storm drain design is the 10-year return event. It does not indicate where surface water in

B

Mr. Mike Mistrot
October 24, 2005
Page 2

B-4

excess of the 10-year event will be discharged. Caltrans standard for introduction of off site surface water to the highway right of way (R/W) is **to not allow any increase in discharge for the 100-year return event**. The EIR indicates the existing detention basin will be expanded from 3.5 acres to 5.8 acres. If this increase in basin size and capacity will reduce the post project discharge to the State's R/W for the 100-year to the pre-project discharge rate, then please provide documentation indicating this. Also, please identify the proposed runoff pattern and outfall.

B-5

- Any increases of discharge into the State drainage system must be mitigated. Runoff must meet the Regional Water Quality Control Board (RWQCB) water quality standards prior to entering the State right of way or drainage facilities. No net increase to the surface water (storm water peak runoff discharge (100 year storm event) within the State right of way and drainage facilities may be realized as a result of the completion of the project. Best Management Practices (BMP) systems should be included to remove objectionable pollutants and to manage storm water prior to discharge into the State right of way. Once installed the property owner must properly maintain these systems. The proponent/developer may be held liable for future damages due to impacts for which the adequate mitigation was not undertaken or sustained. Acceptable constituency levels and appropriate BMP information can be obtained form the RWQCB.

B-6

- The DEIR states a 6 pump (12 station) gas station will be included in the project. The proposed gas station is to be located at the southwest corner of the project site immediately adjacent to SR-162. No information was provided regarding collection and treatment of site runoff from this gas station. Please provide this information.

B-7

- Existing drainage patterns must be perpetuated, maintained or improved. Pre- and post project hydrologic/hydraulic calculations showing the coverage quantities for buildings, streets, parking and landscape areas should be supplied for review. Please request these calculations and send them to Mr. Mike DeWall, District 3 Hydraulics Branch at the address in Marysville for review prior to final project approval. Mr. DeWall can be reached at (530) 741-4056.

Section II.H., Traffic and Circulation:

B-8

- Page 104, Impact and Mitigation H1a.: We concur with the proposed mitigation that traffic signals should be installed on SR 162 (Wood Street) at North Airport Road, the

B

Mr. Mike Mistrot
October 24, 2005
Page 3

B-8 | southbound I-5 ramps and the northbound I-5 ramps in conjunction with the proposed project.

B-9 |

- Pages 104 – 105, Impact and Mitigation H1b.: Improvements made at the Pacific Avenue-Enright Avenue/Wood Street (SR 162) can be expected to provide improvements to the local street operations.

Appendix H, Traffic Report:

B-10 |

- Page 368, Figure 14, Cumulative Plus Project Conditions, Queue Lengths: Some of the storage lengths are optimistic for the cumulative conditions. For the westbound right to southbound I-5, there would have to be widening just west of the structure to provide the storage indicated. Based on the projected queuing, there will still be adequate storage for the demand. The same issue arises at the eastbound left to Humboldt. Please clarify.

Encroachment Permit Required:

B-11 |

- All work conducted in the State's highway ROW will require an encroachment permit. For more information and to secure an application, please contact the Office of Permits at (530) 741-4403.

Please send us a copy of the final environmental impact report for review and comment when available. If you have any questions regarding these comments, please contact Randy Evans, Local Development/Inter-Governmental Review Coordinator, at (530) 634-7616.

Sincerely,

Randy D. Evans
for

BRUCE DE TERRA, CHIEF
Office of Transportation Planning - North

Cc: Scott Morgan, State Clearinghouse
Daniel Obermeier, Glenn County Transportation Commission

C

DEPARTMENT OF TRANSPORTATION

DIVISION OF AERONAUTICS - M.S.#40

1120 N STREET

P. O. BOX 942873

SACRAMENTO, CA 94273-0001

PHONE (916) 654-4959

FAX (916) 653-9531

TTY (916) 651-6827



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OCT 28 2005
STATE CLEARING HOUSE

October 28, 2005

Mr. Mike Mistrot
City of Willows
201 N. Lassen Street
Willows, CA 95988

Dear Mr. Mistrot:

Re: City of Willows Draft Environmental Impact Report for the Willows Wal-Mart Project;
SCH# 2004062128

The California Department of Transportation (Caltrans), Division of Aeronautics (Division), reviewed the above-referenced document with respect to airport-related noise and safety impacts and regional aviation land use planning issues pursuant to the California Environmental Quality Act (CEQA). The Division has technical expertise in the areas of airport operations safety, noise and airport land use compatibility. We are a funding agency for airport projects and we have permit authority for public and special use airports and heliports. The following comments are offered for your consideration.

The proposal is for the construction of a 193,459 square-foot Wal-Mart Supercenter including a gas station with six fuel pumps and a 3,200 square-foot fast-food restaurant. The project site is located approximately 700 feet northeast of Runway 16-34, the primary runway for the Willows-Glenn County Airport.

C-1 | It is difficult to determine from the information provided in the Draft Environmental Impact Report (DEIR), however, it appears that the gas station as shown in Figure 5 may be located within the Runway Protection Zone (RPZ). As we stated in our July 26, 2005 comment letter, airport safety zones and compatible and incompatible land uses must be thoroughly addressed in the DEIR. The DEIR should have included a detailed site plan depicting the safety zones for the Willow-Glenn County Airport and more specifically the RPZ dimensions with respect to the gas station.

C-2 | The RPZ is the most critical of airport safety zones, considered to be "very high risk" due to its proximity to the end of the runway. The RPZ together with the inner safety zones encompass 30% to 50% of near-airport aircraft accident sites. Airport safety zones are established for a reason. While the chance of an aircraft injuring someone on the ground is historically quite low, an aircraft accident is a high consequence event. To protect people and property on the ground from the risks of near-airport aircraft accidents, some form of restrictions on land use are essential. The two principal methods for reducing the risk of injury and property damage on the ground are to limit the number of persons in an area and to limit the area covered by occupied structures.

C-3 | Public Utilities Code, Section 21659, "Hazards Near Airports Prohibited" prohibits structural hazards near airports. The planned height of buildings, antennas, and other objects should be checked with respect to Federal Aviation Regulation (FAR) Part 77 criteria if development is close to the airport, particularly if situated within the runway approach corridors. To ensure compliance with FAR Part 77,

C

Mr. Mike Mistrot
October 28, 2005
Page 2

C-3

"Objects Affecting Navigable Airspace," submission of a Notice of Proposed Construction or Alteration (Form 7460-1) to the Federal Aviation Administration (FAA) may be required. For further technical information, please refer to the FAA's web site at <http://www1.faa.gov/ats/ata/ATA400/-oecaaa.html>.

Due to the proximity of the project site, the guidance in the FAA's Advisory Circular 150/5370-2E, *Operational Safety on Airports During Construction*, should be incorporated into the project design in order to identify any permanent or temporary construction-related impacts (e.g. construction cranes, etc.) to the airport imaginary surfaces. This advisory circular is available at <http://www.faa.gov/ARP/-publications/acs/5370-2e.pdf>.

C-4

The protection of airports from incompatible land use encroachment is vital to California's economic future. Willows-Glenn County Airport is an active airport with approximately 57 based-aircraft and over 33,000 annual operations. Willows-Glenn County Airport is an economic asset that should be protected through effective airport land use compatibility planning and awareness. Although the need for compatible and safe land uses near airports in California is both a local and a State issue, airport staff, airport land use commissions and airport land use compatibility plans are key to protecting an airport and the people residing and working in the vicinity of an airport. Consideration given to the issue of compatible land uses in the vicinity of an airport should help to relieve future conflicts between airports and their neighbors.

These comments reflect the areas of concern to the Department's Division of Aeronautics with respect to airport-related noise and safety impacts and regional airport land use planning issues. We advise you to contact our district office concerning surface transportation issues.

Thank you for the opportunity to review and comment on this proposal. If you have any questions, please call me at (916) 654-5314.

Sincerely,

Original Signed by

SANDY HESNARD
Aviation Environmental Planner

c: State Clearinghouse, Glenn County ALUC, Willows-Glenn County Airport

D



California Regional Water Quality Control Board Central Valley Region

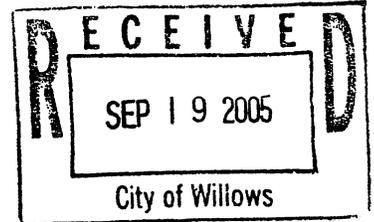


Alan C. Lloyd, PhD
Secretary for
Environmental
Protection

Redding Office
415 Knollcrest Drive, Suite 100, Redding, California 96002
Phone (530) 224-4845 • FAX (530) 224-4857
<http://www.swrcb.ca.gov/rwqcb5>

Arnold Schwarzenegger
Governor

15 September 2005



City of Willows
Attn: Mike Mistrot
201 North Lassen Street
Willows, CA 95988

REVIEW OF ENVIRONMENTAL IMPACT REPORT FOR WILLOWS WAL-MART PROJECT, SCH# 2004062128, WILLOWS, GLENN COUNTY

We have reviewed the Environmental Impact Report for the Willows Wal-Mart Project, submitted to our office on 10 September 2005. The proposed project consists of the replacement of the existing Wal-Mart on the site with an approximately 193,459 square-foot Supercenter on 20 acres. The 22-acre proposed site is located west of Interstate 5 at the northeast corner of Wood Street and North Airport Avenue. Please consider the following comment.

Construction Stormwater Permit

D-1

Based on the project description, it appears that grading or other soil disturbing activities may occur. In order to protect water quality during development activities, appropriate stormwater pollution controls should be implemented when construction activities occur. If construction activities result in a land disturbance of one or more acres, the project will need to be covered under the General Construction Stormwater Permit (Order No. 99-08-DWQ). The permit requires that a Stormwater Pollution Prevention Plan (SWPPP) be prepared prior to construction activities. The SWPPP is used to identify potential pollutants (such as sediment and earthen materials, chemicals, building materials, etc.) and to describe best management practices that will be employed at the site to eliminate or reduce those pollutants from entering surface waters. The Construction Stormwater Permit is administered by the State Water Resources Control Board (State Board) and the Regional Water Quality Control Boards (Regional Boards).

If you have any question regarding the above information please contact me at (530) 224-4784 or the letterhead address above.

Scott A. Zaitz, R.E.H.S.
Environmental Scientist

SAZ: kg



E

Mike Mistrot

From: Doug Holvik [dholvik@countyofglenn.net]
Sent: Wednesday, October 19, 2005 9:53 AM
To: mmistrot@cityofwillows.org
Subject: Walmart DEIR

Comments –

- E-1** | Pg. 12 – Access & Circulation – Right in & right out will cause most of the fast food clients to exit west and flip a “U” at the signal in order to get back to the freeway. This may create additional movements at the intersection and confusion. Is there a better way to configure this arrangement?

- E-2** | Pg. 14 – Grading & Drainage – 14,000 C.Y. of material was removed from the site during the original construction causing the S.W. corner to experience intermittent flooding. This area should be raised with the construction of the new filling station and I would caution the removal of an additional 26,000 C.Y. with the new construction. Also, only the very eastern portion of the original project was allowed to drain directly into the main Wood Street storm drain with the remainder being routed to the detention basin. The intent was that all future development drainage would be taken to the detention basin and metered into the main Wood Street drain. This concept should be followed for the proposed development.

- E-3** | Pg. – Site Drainage – Incorrect – The southwesterly and westerly watersheds both drain to the junction box which regulates whether it’s allowed to go directly to the main storm drain or is diverted to the detention basin. All additional drainage should be directed to the detention basin and the basin should be enlarged accordingly.

- E-4** | Pg. 47 – Flooding Potential – I’m not sure what the Glenn Colusa Canal flood zone on the west side of I-5 refers to.

- E-5** | Pg. 48 – Impact D1 – Instead of “velocity” of peak runoff it should say “discharge”

- E-6** | Pg. 50 – Impact D2 – As previously mentioned, the S.W. corner of the site should be raised with the construction of the new filling station since this is the area that typically experiences standing water during heavy storms.

- E-7** | Pg. 83 – Transit Systems – End of middle paragraph should indicate downtown Willows not Oroville.

F

Mike Mistrot

From: Claire Arano [carano47@hotmail.com]
Sent: Saturday, October 29, 2005 1:26 PM
To: mmistrot@cityofwillows.org
Subject: Wal-Mart Input to EIR

F-1

As an Orland resident and city Planning Commissioner, I am concerned about the proposed expansion of the Willows Wal-Mart store into a "supercenter". Not only will the expansion impact Willows, but Orland, as well. Our newly-formed Economic Development Commission is working diligently with the planning commission and local businesses to keep everyone afloat while seeking additional businesses to our community.

If Wal-Msrt is allowed to replicate downtown Willows on the interchange at 162 and I-5, not only will the last drop of lifeblood be sucked from downtown Willows, but from Orland as well.

F-2

According to UC Berkeley's Labor Center Briefing Paper, Wal-Mart workers rely on public assistance to shore up their wages and health needs. In essence, the taxpayer is subsidizing Wal-Mart by picking up the gap in wages and medical insurance.

The wage base for our entire area will see a downturn because so many of the Wal-Mart workers earn little more than minimum wage, and very, very few workers are "full-time". Since Wal-Mart considers anything more than 28 hours in a week as full-time, most of the workers are working part-time, and as such are in need of the safety net of welfare, free lunches, subsidized housing and MediCal.

Please place my comments in the EIR comments file and consider the long-term effects of a "super" Wal-Mart on our small county.

Thank you --- Claire Arano 4231 Road E - Orland, CA 95963

Claire Arano

(530) 865-2431 Ginter & Brown Realty

(530) 519-7421 Cell Phone

(530) 865-7261 Home

10/31/2005

G

10-26-05

Dear Sirs:

G-1

I am totally against Wal Mart becoming a Super Wal Mart store. A few years ago, I stopped at the Chico Wal Mart and was surprised to find the same items I bought in Willows, were more expensive here. I asked the store manager why the price difference and was told each store could price items according to what the local population could bare. I was told if I "didn't like the Willows prices", I "could just stop up in Chico". I asked about our Seniors and lower income families, and was told, "I guess if they can't get to Chico, they'll just have to pay our prices."

If the Super Store comes in, the prices will be lower, until they drive our local businesses out, then you can bet they'll increase their prices.

As for Wal Mart bringing in more

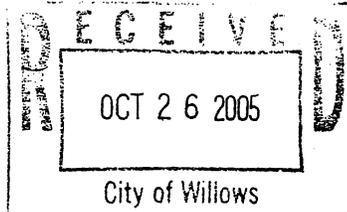
G

G-1

people, shopping willows, is a laugh
yes, people come to town, get off the
freeway and go to Walmart, not down
town.

Do not allow Walmart to ruin
our town.

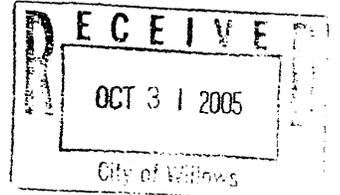
Sincerely
Mrs. Lorraine Baird
545 E. Wood St
Willows, Ca. 95988



H

October 29, 2005

City of Willows
201, N. Lassen
Willows, Ca. 95988



attn: Mike Mistrot.

H-1

Glenn County Needs Wal-Mart Supercenter
They provide services that are not
available to the citizens, especially the
Senior Citizens who can't drive because
of poor eye site or too feeble, whereas
they can take a taxi if they want to shop
for the following:

affordable groceries, yardage, Men's
department, Ladies ready-to-wear, children's
dept., shoe department, Ceramics, Electronics
(Mainly T.V.'s) Large nursery, Curtains, bedding
household (Coffy pots, Microwaves etc.)

The above are not available in Glenn
County. Please approve. Approve the E.I.R
Thank you,

Glady M. Esteneout
P.O. Box 121, Willows Ca. 95988

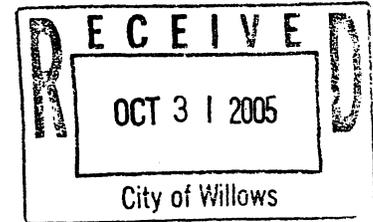
I

October 31, 2005

To the City of Willows
Willows, California 95988

RE: Wal-Mart Super Center Store

To Whom It May Concern:



A week or so ago I attended the town meeting for concerned citizens regarding the new Wal-Mart Super Center proposal, that was held at Pat & Larry's restaurant. As I sat and listened, what I heard were the "Me's" who talked about their own personal reasons why they thought the Super Center Store would be good for Willows. And then there were the "We's", who were concerned on the overall effect a store of this magnitude would have on our community and town as a whole.

And concerned we should be:

I-1

We already have a Wal-Mart store here. As Stacy Mitchell said in her presentation delivered in St. Croix Falls, Wisconsin, on October 8, 2003; "Just because it builds a new Super Center it doesn't mean people are going to need more gallons of milk or pairs of socks. Unless this town is experiencing astronomical population or income growth, it's impossible to absorb one of these giant stores without causing sales to decline sharply at existing businesses, some of which will be forced to close altogether."

These existing businesses have been here for years, some for generations. They and their families have supported this city and its community. They have been able to survive with this Wal-Mart but would not be able to compete with this Super Center. Products, those that for the majority come from China or other low-wage places for low production costs.

"Wal-Mart concedes that when it comes to town, it's out to eliminate competitors. Any store it opens can crush our local groceries, pharmacies, hardware stores, clothiers and other retailers not by being more efficient, but by slashing its prices below what it pays for the products. And when it's over, when the local competitors are bled to death, this Wal-Mart store's prices rise. Wal-Mart isn't a job creator for our communities. By crushing local businesses, this giant eliminates three decent jobs for every two poorly paid, part-time, high-turnover Wal-Mart jobettes that it creates. It is an extractor of community wealth, not a creator. This Super Store will sit like a giant tombstone sucking up local money and channeling it to Bentonville." (Jim Hightower, Thieves In High Place, 2003). We already see this pricing now, as you can go to the Wal-Mart in Chico and find the same item for less than at the Willows store.

I ask you to take into consideration just some of the information I have been able to compile over this short period of time. A very good Web Site is The Institute for Local Self-reliance based in Minneapolis (www.ilsr.org) I ask you to please read the attached UC Berkeley Labor Centers August 2, 2004 report on the Hidden Cost of Wal-Mart jobs and the speech made by Stacy Mitchell author of The Home Town Advantage, which I have also included with this plea to take a good hard look as to the reality of what will happen if we let Wal-Mart expand its doors.

I

I-1

We are not alone, it is coming out more and more in the news about cities who are fighting to keep out the Wal-Mart and other Big Box Stores and their super centers. For just a few, Fresno, Auburn, Eureka, Grass Valley, North Auburn, Reedly, San Francisco, San Juan Capistrano, Santa Maria, Santa Rosa, Simi Valley California. And this list goes on as you look at what is happening through out the rest of the United States. If they are worried about protecting their community shouldn't we?

Respectfully yours,

Suzy Boyd
Jim Boyd
Phyllis Boyd
Sarah Steinhoff
Molly Steinhoff
Roger Steinhoff

Enclosure

Hightower, Jim "Thieves In High Places" pages 166-193
Mitchell, Stacy 2003 Institute for Local Self-Reliance www.ilsr.org
Norman, Al www.sprawl-busters.com

Attachment to Comment Letter from Suzy Boyd et al.

UC BERKELEY

LABOR

CENTER

BRIEFING PAPER SERIES

Hidden Cost of Wal-Mart Jobs

*Use of Safety Net Programs
by Wal-Mart Workers in California*

Arindrajit Dube, Ph.D.
UC Berkeley Institute of Industrial Relations

Ken Jacobs
UC Berkeley Center for Labor Research and Education

August 2, 2004

HIDDEN COST OF WAL-MART JOBS

Use of Safety Net Programs by Wal-Mart Workers in California

Arindrajit Dube, Ph.D.
UC Berkeley Institute for Industrial Relations

Ken Jacobs
UC Berkeley Center for Labor Research and Education

August 2, 2004

Executive Summary

Wal-Mart is the largest employer in the United States, with over one million workers. It is the largest food retailer and the third largest pharmacy in the nation. The company employs approximately 44,000 workers in California, and has plans to expand significantly in the state over the next four years. Wal-Mart workers receive lower wages than other retail workers and are less likely to have health benefits. Other major retailers have begun to scale back wages and benefits in the state, citing their concerns about competition from Wal-Mart.

We estimate that Wal-Mart workers in California earn on average 31 percent less than workers employed in large retail as a whole, receiving an average wage of \$9.70 per hour compared to the \$14.01 average hourly earnings for employees in large retail (firms with 1,000 or more employees). In addition, 23 percent fewer Wal-Mart workers are covered by employer-sponsored health insurance than large retail workers as a whole. The differences are even greater when Wal-Mart workers are compared to unionized grocery workers. In the San Francisco Bay Area, non-managerial Wal-Mart employees earn on average \$9.40 an hour, compared to \$15.31 for unionized grocery workers—39 percent less—and are half as likely to have health benefits.

At these low-wages, many Wal-Mart workers rely on public safety net programs—such as food stamps, Medi-Cal, and subsidized housing—to make ends meet. The presence of Wal-Mart stores in California thus creates a hidden cost to the state's taxpayers.

This study is the first to quantify the fiscal costs of Wal-Mart's substandard wages

and benefits on public safety net programs in California. It also explores the potential impact on public programs of Wal-Mart's competitive effect on industry standards.

Main Findings:

- Reliance by Wal-Mart workers on public assistance programs in California comes at a cost to the taxpayers of an estimated \$86 million annually; this is comprised of \$32 million in health related expenses and \$54 million in other assistance.
- The families of Wal-Mart employees in California utilize an estimated 40 percent more in taxpayer-funded health care than the average for families of all large retail employees.
- The families of Wal-Mart employees use an estimated 38 percent more in other (non-health care) public assistance programs (such as food stamps, Earned Income Tax Credit, subsidized school lunches, and subsidized housing) than the average for families of all large retail employees.
- If other large California retailers adopted Wal-Mart's wage and benefits standards, it would cost taxpayers an additional \$410 million a year in public assistance to employees.

Introduction

When workers do not earn enough to support themselves and their families through their own jobs, they rely on public safety net programs to make ends meet. In fact, more than half of the public assistance in California now goes to the working poor.¹

This report estimates the public assistance expenditures for California workers employed by Wal-Mart. The report quantifies the cost of public assistance in California resulting from Wal-Mart's pay and benefit package, using data compiled on the ten largest public assistance programs in the state.² Wal-Mart is the largest employer in the United States, with more than one million workers. As of 2001, Wal-Mart had 143 stores and employed about 44,000 workers in California. It is expanding rapidly. Wal-Mart's wages and benefits are significantly below retail industry standards. Since Wal-Mart's future growth trajectory may have a significant impact on industry standards, the study also assesses the potential costs that taxpayers would incur if other large retailers in the state were to follow the Wal-Mart model due to real or perceived competitive pressure.

Several recent reports have explored the issue of public supports to Wal-Mart workers. The best documented example comes from Georgia and involves a single healthcare program. A state survey found that Wal-Mart employees rely disproportionately

on the state's Children's Health Insurance Program, PeachCare, accounting for more than 10,000 of the 166,000 children enrolled in the program (see A. Miller 2004). A report by the Democratic Staff of the Committee on Education and the Workforce of the U.S. House of Representatives, prepared for Congressman George Miller (2004), looked at the issue of public support to Wal-Mart workers across a wider range of programs. Using employee eligibility for programs to estimate the public costs of Wal-Mart's compensation policies, the report estimates that a typical 200-employee Wal-Mart store may cost federal taxpayers \$420,750 a year—about \$2,103 per employee. The research reported here goes a step further and models actual program utilization, as opposed to worker eligibility, across the same wide range of programs.

To fully understand the impact of Wal-Mart's compensation policies on public safety net programs, we must look beyond the number of Wal-Mart workers who participate in these programs and also consider Wal-Mart's growing influence on the retail industry as a whole. Wal-Mart is expanding into retail sectors and geographic areas with traditionally higher standards for wages and benefits. With the development of "supercenters" that combine retail with groceries in mega-stores, Wal-Mart has become the largest grocery retailer in the United States, accounting for a 19 percent share of the grocery market. Wal-Mart is the third largest pharmacy in the country, behind Walgreens and CVS. While more than half of Wal-Mart's stores nationwide are supercenters, they have only just begun to enter the California grocery market. The first supercenter opened in Palm Springs earlier this year; Wal-Mart plans to open 40 more supercenters in the state over the next five years (Goldman, 2003).

¹ By public assistance we are referring to the following means tested safety net and tax credit programs: Transfer Assistance to Needy Families (TANF), Food Stamps, Section 8 housing vouchers, Low income energy assistance program, women and infant care program, free or reduced price school lunch and breakfast, Earned Income Tax Credit (EITC), Women, Infants and Children (WIC) nutrition program, Medi-Cal (Medicaid), and Healthy Families (State Children's Health Insurance Program—SCHIP).

² See the ten programs listed in footnote 1.

Other major retailers, most notably in grocery, have begun to scale back wages and benefits, citing concern over competition from Wal-Mart. In a report for the Orange County Business Council, Boarnet and Crane (1999) found that the economic impact of Wal-Mart's entry into Southern California could depress wages and benefits in the region by as much as \$2.8 billion a year by driving down compensation in the retail sector. The threat of competition from Wal-Mart supercenters was used to justify—however accurately—the major grocery chains' proposal to significantly reduce wage and benefit levels for new employees in unionized stores in Southern California (Raine 2004).³

Wal-Mart's impact on compensation across the retail industry is due to a combination of both genuine and perceived threats of competition, and to the fact that as the country's largest employer, it has become a standard setter. In a commentary in *Business Week*, Holmes and Zellner (2004) discuss the pressure from Wall Street to follow the Wal-Mart model, noting that CEOs find it easier to follow Wal-Mart's low-wage route, even when a higher wage/high productivity model may do as well for shareholders and be better for the economy over the long run. We will refer to this as Wal-Mart's *demonstration* effect. In the final part of this report, we estimate the potential cost on taxpayer supported safety net programs in the state of Wal-Mart expansion and impact on industry standards.

Finally, we should ask if Wal-Mart's expansion affects employment in a way that would offset the public costs for assistance to the firm's employees. If Wal-Mart's entry into a market creates net new jobs, an argument

can be made that though Wal-Mart workers earn wages that leave many below self-sufficiency, the alternative for a part of the workforce would be unemployment, with other attending public costs. There is strong evidence, however, that the jobs created by new Wal-Mart stores generally replace other, often higher-paying jobs, as existing retailers are forced to scale back or go out of business. Stone (1997) found that in the 10 years following the opening of a Wal-Mart, nearby towns lost up to 47 percent of their retail trade. Retail trade in urban areas also declined following the entry of Wal-Marts in nearby suburbs. Studies of the overall impact of Wal-Mart on employment are inconclusive, with some pointing to a net job loss and others to small increases in employment.⁴ For the purposes of this study, we take the middle ground and assume no overall change in employment levels from Wal-Mart's entry into the market.

Wal-Mart Wages and Benefits

Data Sources

In the absence of data on actual public assistance utilization by Wal-Mart workers, we rely on information about Wal-Mart's compensation policies and on the March 2002 Current Population Survey data to estimate the taxpayer cost, covering the period between March 2001 and March 2002. For wage and benefit information, we utilize 2001 data made available publicly by Wal-Mart via the testimony of Dr. Richard Drogin in a sex-discrimina-

³ For a discussion of the impact of the two-tier contract on grocery industry compensation see Dube and Lantsberg (2004).

⁴ For example, in a study of Talbot County, Maryland, Harris (1996) reports net job loss from Wal-Mart entering the market. Basker (2003) estimates a small net gain in employment using a longitudinal statistical analysis of county business patterns. Retail Forward (2003) projects two supermarket closures for each new Wal-Mart supercenter.

tion lawsuit brought against Wal-Mart. The wage data we utilize is national in scope, and is not broken down by state. However other corroborative evidence suggests that applying this national data to California is unlikely to exaggerate Wal-Mart's share of public assistance and is therefore unlikely to inflate our cost estimates.⁵

Number of Wal-Mart Workers in California

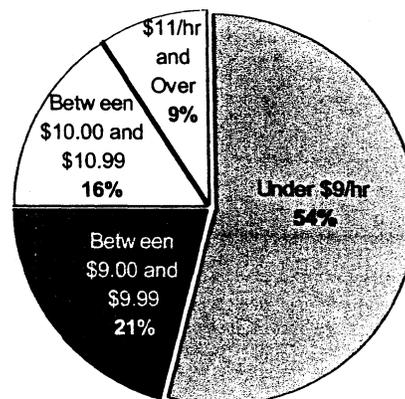
Wal-Mart employed 930,770 employees nationally in 2001,⁶ the most recent year for which we have data and on which we base our analysis. Although we do not have specific employment numbers for California, we are able to estimate the size of the California Wal-Mart workforce using store locations data available publicly on Wal-Mart's website. We find that there are 3,018 Wal-Mart and Sam's Club stores, and that 143 (or 4.7 percent) are located in California. Applying this proportion to total Wal-Mart employment, **we estimate that there are roughly 44,000 Wal-Mart employees in California.**

Wages and Benefits of Wal-Mart Workers

The wage data provided by Wal-Mart via Dr. Drogin's testimony⁷ covers all active part-time workers and active full-time workers with at least one year of tenure—about 65 percent of Wal-Mart's workforce. The dataset

provides wage levels and number of employees for 382 full-time and 313 part-time occupational classifications. This level of detail allows us to estimate the distribution of Wal-Mart's wages. **We find that 54 percent of Wal-Mart workers in 2001 earned below \$9 per hour, 21 percent earned between \$9.00 and \$9.99, while another 16 percent earned between \$10.00 and \$10.99 per hour** (see Figure 1). Since the dataset only includes those full-time workers who have completed one-year of tenure, the wages in the sample are likely to be higher than the wages of the full Wal-Mart worker population. Since higher wage levels result in lower participation in safety net programs, this will produce conservative estimates of public assistance costs.

Figure 1: Wal-Mart Wage Distribution



Source: Drogin's Testimony based on Wal-Mart Payroll Data

⁵ Utilizing separate Wal-Mart data for wages at stores only in the high-wage San Francisco Bay Area, we find a differential of 36 percent between average Wal-Mart wages and the average wage rate for workers in large retail as a whole in the same geographic area. This is a *larger* wage differential than we find comparing the national Wal-Mart data with the averages for large retail workers in the state. This provides confidence that our use of national data for wage comparisons is unlikely to have significantly inflated the wage differential between Wal-Mart and other large retailers in the state.

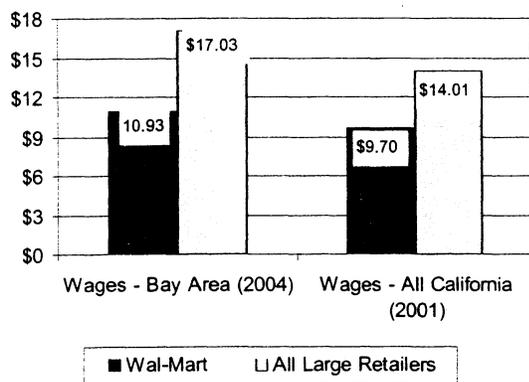
⁶ Dr. Richard's Drogin's Testimony, Appendix 4a, based on PeopleSoft Data.

⁷ Ibid. Appendix 8a and 8b.

Wal-Mart's wages are significantly below retail industry standards. Figure 2 compares Wal-Mart's average wages with the average wages of large retailers (defined as having 1,000 or more employees) as a whole. We find that Wal-Mart workers earn on average 31 percent less than workers in large retail as a whole, with wages of \$9.70 per hour compared to the \$14.01 average per hour earnings

for large retail workers. Utilizing Wal-Mart data for wages at stores only in the high-wage San Francisco Bay Area, we find an even greater wage differential of \$10.93 per hour for Wal-Mart workers compared to \$17.03 per hour for large retail workers as a whole, a difference of 36 percent.

Figure 2: Average Wages—Wal-Mart versus All Large California Retailers

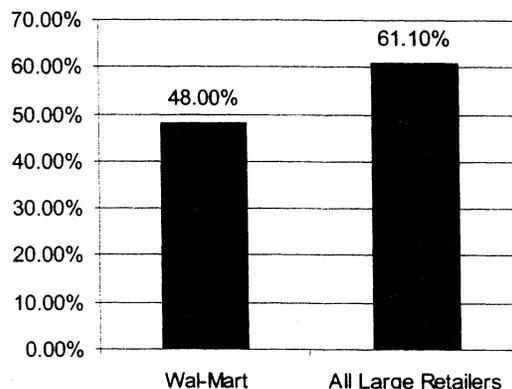


Source: Drogin's Testimony based on Wal-Mart Payroll Data, Wal-Mart Press Releases, CPS ORG 2004, CPS ORG 2001

Wal-Mart reports that 48 percent of its workforce is enrolled in its health plan (Goldman 2003). This data implies that of the 44,000 California Wal-Mart workers, 22,900 do not receive employer-sponsored health insurance, while 21,100 do. Figure 3 compares the rate of employment based health coverage for Wal-Mart employees with the average coverage rate for workers in all large retail establishments. We find that 23 percent fewer Wal-Mart employees are covered by employer-sponsored health insurance than large retail employees in general.⁸

⁸ We assume Wal-Mart's health coverage between March 2001 and March 2003 was the same as the present rate of 48 percent.

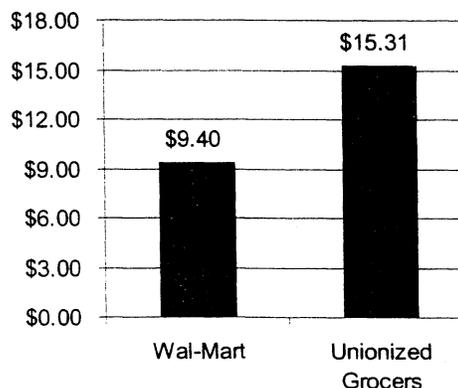
Figure 3: Employment Based Health Coverage in California (2004)



Source: March 2003 CPS; Goldman (2003)

We next compare Wal-Mart wages and benefits for non-managerial workers with those of unionized grocery workers in the Bay Area. Wal-Mart employees earn on average \$9.40 an hour, compared to \$15.31 for the unionized grocery workers, or 39 percent less (Figure 4).⁹ They are half as likely as unionized grocery workers to have health benefits (Figure 5).

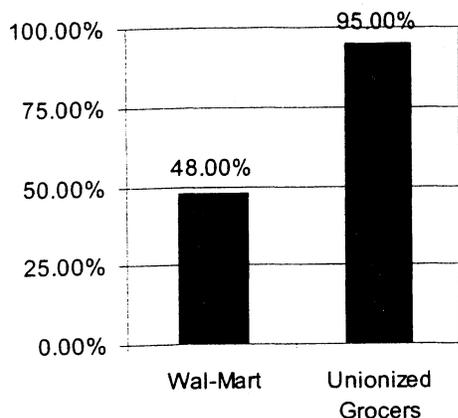
Figure 4: Non Managerial Wages in Bay Area: Wal-Mart versus Unionized Grocers



Source: Drogin's Testimony based on Wal-Mart Payroll Data, Wal-Mart Press Releases, CPS ORG 2004, March 2001 CPS

⁹ We impute this by multiplying the average Wal-Mart wage in the Bay Area (\$10.93) by the ratio of non-managerial wage to overall wage of Wal-Mart workers nationwide.

Figure 5: Employment Based Health Coverage in Bay Area: Wal-Mart versus Unionized Grocers



Source: Drogin's Testimony based on Wal-Mart Payroll Data, Wal-Mart Press Releases, CPS ORG 2004, March 2001 CPS

Public Assistance Received by Wal-Mart's California Workforce

We estimate the public costs going to Wal-Mart workers by utilizing (1) wage and benefit information about Wal-Mart workers, and (2) a statistical model of public assistance utilization based on a worker's wages, employment based health coverage and demographic information (including race, age, gender, family size structure, non-wage income, other family members' employment based coverage, number of children).¹⁰ We simulate Wal-Mart's share of public assistance by using Wal-Mart data on wages and benefits; in the

¹⁰ Here we use a similar methodology to that used in our study *The Hidden Public Costs of Low Wage Work* (<http://laborcenter.berkeley.edu/livingwage/workingpoor.pdf>); details on methodology can be found in the appendix of that report.

absence of demographic data on Wal-Mart workers specifically, we assume the same demographic structure of its workforce as that of other large retailers in California.¹¹ For comparative purposes, we calculate assistance going to all workers in retail companies with 1,000 or more employees (the largest firm-size category in the CPS) in California. Finally we project the public assistance cost for large retailers in California under "Wal-Martization"—i.e., if wages and benefits at all large retail stores fell to the Wal-Mart standard. We report health and non-health public assistance amounts separately. Health related public assistance refers to Medi-Cal and Healthy Families, as California's Medicaid and State Children's Health Insurance Program are known, respectively.

We find that overall, families of California Wal-Mart workers rely heavily on public safety net programs. We estimate the total cost to the public for public assistance to Wal-Mart workers at \$86 million a year. This includes \$32 million in health related expenses, and \$54 million in other assistance.

Wal-Mart workers rely disproportionately on public assistance compared to workers in other large retail firms. The following table shows that the average Wal-Mart worker receives \$1,952 in public assistance, compared to \$1,401 for workers in large retail in general. This figure is close to the estimates from G. Miller (2004), in spite of the different

¹¹ This very well may underestimate Wal-Mart's receipts. Wal-Mart tends to employ a greater share of women in its workforce than other retailers. Since women are more likely utilize public assistance programs than men, adjusting for gender differences would produce larger estimates. However, since data on gender is the only demographic information we have on Wal-Mart employees, we erred on the side of caution by excluding any adjustment, as it may be that there are other offsetting demographic factors.

methodologies employed in the two studies.¹² Wal-Mart workers in California receive an estimated 40 percent more in family-level Medi-Cal and Healthy Families than workers at large retailers generally. Workers at Wal-Mart receive an additional 38 percent in non-health related public assistance compared to their counterparts at other large California retailers. It is worth noting that this premium is in addition to an already high public cost for retail workers. Zabin, Dube and Jacobs (2004) found that workers in the retail industry in general in California rely disproportionately on public assistance programs, compared to workers in other industries.

Table: Family Level Public Assistance—Workers at Wal-Mart and Large California Retailers

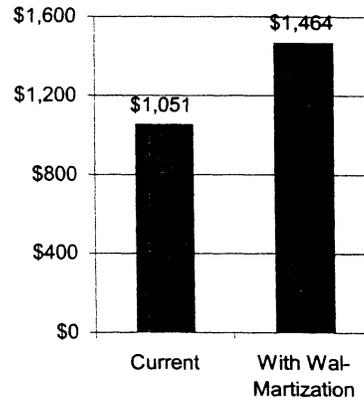
	Health Related	Other	Total Public Assistance
Wal-Mart			
Public Assistance per Worker	\$730	\$1,222	\$1,952
Total Public Assistance Going To Wal-Mart Workers	\$32,100,000	\$53,800,000	\$85,900,000
Large Retailers in California			
Public Assistance per Worker	\$521	\$880	\$1,401
Total Public Assistance Going To Large Retail Workers	\$390,800,000	\$660,000,000	\$1,050,800,000

Source: Drogin's Testimony based on Wal-Mart Payroll Data, Wal-Mart Press Releases, March 2003 CPS, Administrative Data on Public Assistance Program Enrollment and Cost

There are 750,000 workers in large retail firms in California. Multiplying the average cost of benefits to Wal-Mart workers by the total number of retail workers in the state, we find that if other large California retailers

adopted Wal-Mart's wage and benefits standards, the total annual cost of public assistance to workers in large retailers would be \$1.46 billion, an increase of \$410 million (Figure 6). In other words, if other large retailers in the state adopted Wal-Mart's wage and benefits policies, it would cost California taxpayers an additional \$410 million a year. This provides an estimate of the long-term potential impact on California taxpayers of Wal-Mart's effect on the retail industry as a whole in the state.

Figure 6: Total Annual Public Assistance to Workers of Large California Retailers (in Millions)



Source: Drogin's Testimony based on Wal-Mart Payroll Data, Wal-Mart Press Releases, March 2003 CPS, Administrative Data on Public Assistance Program Enrollment and Cost

If our estimates for California are indicative of Wal-Mart workers' utilization of safety net programs nationally, as the Miller report (2004) suggests, the cost to taxpayers nationally for public assistance to Wal-Mart workers could be as much as \$2 billion a year.

¹² G. Miller (2004) uses eligibility criteria to determine the amount of assistance Wal-Mart employees may qualify for; we estimate assistance utilized by Wal-Mart employees.

Other Potential Costs Not Considered in Our Estimation

We believe our results provide conservative estimates of the indirect public subsidy to Wal-Mart. There is reason to believe that Wal-Mart affects public assistance utilization not only through its compensation policies, but also by actively encouraging employees to participate in such programs. For example, the PBS television program *Now with Bill Moyers* reported that Wal-Mart provides all new employees with a 1-800 number to call to determine benefits eligibility. This is important because for many programs, fewer people actually participate in the programs than are eligible for them. Assistance to help employees receive benefits by Wal-Mart may increase take-up rates. This is not factored into our analysis, which means we very likely *understated* the true cost of Wal-Mart to taxpayers. Second, our public health costs are limited to Medi-Cal and Healthy Families. In reality, some Wal-Mart workers are likely neither insured nor enrolled in Medi-Cal. When such workers or their family members get sick, they might visit emergency rooms—a particularly expensive form of care delivery. Moreover, oftentimes such care is not paid for by the patient, leaving taxpayers to pick up the tab. This “uncompensated care” costs California about \$5 billion each year, with the greatest burden falling on County Health Systems.¹³ The share of these costs for Wal-Mart workers should be taken into account in a full accounting of the company’s impact on state taxpayers.

Conclusion

Wal-Mart workers’ reliance on public assistance due to substandard wages and benefits has become a form of indirect public subsidy to the company. In effect, Wal-Mart is shifting part of its labor costs onto the public. We estimate the cost of the subsidy to Wal-Mart in California for state taxpayers to be \$86 million a year. Other retail firms that carry their own weight by providing self-sufficiency wages and employer-sponsored health insurance are placed at a competitive disadvantage, which can result in a downward cycle for wages and benefits across the industry. As we have shown, Wal-Mart’s long term impact on compensation in the retail industry has the potential to place a significant strain on the state’s already heavily burdened social safety net. We estimate the cost if large retailers throughout the state adopted Wal-Mart’s wage and benefits standards to be an additional \$410 million a year in public assistance expenses. The public cost of low-wage jobs should be taken into account by policy makers at all levels as they make decisions about the kinds of economic development we should encourage in California and in our communities.

¹³ Extrapolated from Finocchio (2003).

Bibliography

- Emek Basker, "Job Creation or Destruction: Labor Market Effects of Wal-Mart Expansion." University of Missouri, January 2004. www.missouri.edu/~econwww/WP/WP2002/WP0215_basker.pdf
- Marlon Boarnet and Randall Crane, "The Impact of Big Box Grocers on Southern California." Prepared for the Orange County Business Council, 1999. www.na4lc.org/studies/So%20Cal%20Big%20Box%20Grocery%20Study.pdf
- Richard Drogin, "A Statistical Analysis of Wal-Mart Gender Patterns," March 2003.
- Arindrajit Dube and Alex Lantsberg, "Wage and Health Benefit Restructuring in California's Grocery Industry: Public Costs and Policy Implications." UC Berkeley Center for Labor Research and Education, 2004. http://laborcenter.berkeley.edu/lowwage/grocery_fullreport.pdf
- Leonard Finocchio et al. "Reassessing Hospital Uncompensated Care in California: Implications for Research and Policy." *CPRC Brief*, vol. 15, no. 3, March 2003.
- Abigail Goldman and Nancy Cleeland, "An Empire Built on Bargains Remakes the Working World." *Los Angeles Times*, November 23, 2003. www.latimes.com/news/custom/showcase/la-fi-walmart23nov23.story
- Kevin Harris, "When Wal-Mart Comes to Town." *American Planning Association*, News and Views, Economic Development Division, October 1996. Cited at: www.tradelocal.org/arts/wrongwal.htm
- Stanely Holmes and Wendy Zelner, "The Costco Way Higher wages mean higher profits. But try telling Wall Street," *Business Week*, April 12, 2004.
- Phillip Matera and Ann Purinton, "Shopping for Subsidies: How Wal-Mart uses Taxpayer Subsidies to Finance its Never-Ending Growth." Good Jobs First, 2004. www.goodjobsfirst.org/pdf/wmtstudy.pdf
- Andy Miller, "Wal-Mart Stand Out On Rolls of PeachCare," *The Atlanta Journal Constitution*, February 27, 2004. www.ajc.com/business/content/business/0204/27walmart.html
- Congressman George Miller, "Everyday Low Wages: The Hidden Price We All Pay for Wal-Mart." Report by the Democratic Staff of the Committee on Education and the Workforce, U.S. House of Representatives, 2004. <http://edworkforce.house.gov/democrats/WALMARTREPORT.pdf>
- Now with Bill Moyers*, Transcript, December 19, 2003. www.pbs.org/now/transcript/transcript247_full.html
- George Raine, "Prayers for end to strike-Demonstrators ask Safeway's CEO to resume talks." *San Francisco Chronicle*, January 29, 2004.
- Retail Forward, "Wal-Mart Food: Big and Getting Bigger." September 2003.
- Kenneth E. Stone, "Impact of the Wal-Mart Phenomenon on Rural Counties." Increasing Understanding of Public Problems and Policies-1997, Conference Proceedings. www.farmfoundation.org/pubs/increas/97/stone.pdf
- Kenneth E. Stone, "Impact of Wal-Mart Stores on Iowa Communities: 1983-93." *Economic Development Review*, Spring 1995.
- Carol Zabin, Arindrajit Dube and Ken Jacobs, "The Hidden Public Costs of Low-Wage Jobs in California." UC Berkeley Center for Labor Research and Education, 2004. <http://laborcenter.berkeley.edu/livingwage/workingpoor.pdf>

Attachment to Comment Letter from Suzy Boyd et al.

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The Hometown Advantage

Reviving Local Retail and Stopping Chain Store Sprawl

By Stacy Mitchell*

I'd like to thank all of you for coming out. It's heartening to see so many people concerned about the future of their community.

In her book, *The Death and Life of Great American Cities*, Jane Jacobs writes that what creates a sense of community is not any one particular thing, but rather the many small interactions that occur in our everyday lives.

"It grows," she writes, "out of people stopping by the bar for a beer, getting advice from the grocer and giving advice to the newsstand man, comparing opinions with other customers at the bakery and nodding hello to the two boys drinking pop on the stoop . . . hearing about a job from the hardware man and borrowing a dollar from the druggist . . ."

"Most of it is ostensibly utterly trivial," she goes on, "but the sum is not trivial at all. The sum of such casual, public contact at the local level. . . most of it fortuitous, most of it associated with errands . . . is a feeling for the public identity of people, a web of public respect and trust, and a resource in time of personal or neighborhood need. The absence of this trust is a disaster. . ."

What Jacobs describes is a close-knit community built around a cohesive and vibrant local retail economy. It is a place of small stores and sidewalks. A place where commerce and community life intermix. A place where we buy goods and services from businesses owned by our neighbors.

* Stacy Mitchell is a researcher with the Institute for Local Self-Reliance and author of *The Home Town Advantage: How to Defend Your Main Street Against Chain Stores and Why It Matters* (ILSR, 2000). This presentation was delivered in St. Croix Falls, Wisconsin, on October 8, 2003.

Such places are increasingly rare. Countless cities and towns across America are now ringed by identical big box stores and acres of asphalt. Their downtowns are shuttered and vacant. Their locally owned businesses have long since disappeared, displaced by global chains that have limited ties and no long-term commitment to the community.

The trends of the last decade are staggering. Since 1990, 11,000 independent pharmacies have closed; chain drugstores now account for more than half of all pharmacy sales. More than 40 percent of independent bookstores have failed. Barnes & Nobles and Borders capture half of all bookstore sales. Local hardware stores are likewise disappearing. Home Depot and Lowe's control nearly 45 percent of that market. Five firms account for nearly half of all grocery sales. Blockbuster Video rents one out of every three videos. More than 40 percent of restaurant spending is captured the top 100 chains. Most striking of all, a single firm, Wal-Mart, now captures 9 percent of all U.S. retail sales. Wal-Mart now ranks as the largest grocer in the country, the largest toy seller, the largest furniture dealer, the largest music retailer, and the list goes on.

According to the conventional wisdom, these trends are both desirable and inevitable. We tend to assume that large retail corporations strengthen the local economy by generating new jobs and tax revenue. We assume that they benefit competition and consumers. And, even though at times we may mourn the loss of the neighborhood pharmacy or the local bookstore, ultimately we believe that there's not much we can do about it. This is simply the free market at work.

But the actual experience of many towns and cities over the last few years is at odds with the conventional wisdom. Chain retailers rarely deliver all of the benefits they claim. And these stores often entail significant hidden costs—economic as well as environmental and social.

One of the things we tend to assume about big box retailers, for example, is that they create new jobs and tax revenue. And in fact they do. A 100,000 square foot store—that's about the size of a typical Home Depot—might employ 200 people and generate significant property and sales tax revenue.

But what is often overlooked is the other side of the balance sheet. Study after study has found that big box stores destroy about as many jobs as much tax revenue as they create. This is because retail spending in a given market is a relatively fixed pie. Just because Wal-Mart builds a new outlet, it doesn't mean people are going to need more gallons of milk or pairs of socks. Unless your town is experiencing astronomical population or income growth, it's impossible to absorb one of these giant stores without causing sales to decline sharply at existing businesses, some of which will be forced to downsize or close altogether.

Dr. Kenneth Stone, an economics professor at Iowa State University, has tracked the impact of Wal-Mart and Home Depot on Iowa towns for more than a decade. His studies have consistently found that retail growth is a "zero-sum-game." That is, gains in sales at new Wal-Mart and Home Depot stores are mirrored by sales losses at existing businesses. Since Wal-Mart first entered Iowa, more than 7,000 small businesses have closed. As these businesses have disappeared, Iowa communities have lost at least as many retail jobs as the big superstores have created.

These lost jobs typically paid more with better benefits than the new jobs at the supercenter. Workers at Wal-Mart and Target supercenters earn about one-third less than employees of most supermarkets, which are unionized. Taxpayers often have to make up the difference, because many Target and Wal-Mart employees rely on food stamps and other forms of public assistance to get by.

Just as the promise of new jobs often proves to be an illusion, so too does the promise of new tax revenue. When a new supercenter opens on the outskirts of town,

commercial activity in the downtown declines. Over time, so too do downtown property values and tax revenue. Meanwhile, the sprawling new superstore requires substantial outlays for road maintenance, police, and other public services. It's not uncommon for these new costs, combined with the drop in downtown revenue, to actually exceed the tax revenue generated by the superstore.

Take the case Pineville, North Carolina. This town of 3400 people has added some 6 million square feet of retail development over the last decade. Many small towns aspire to have such a large commercial tax base in order to keep residential tax rates low. But Pineville has discovered that these stores are very costly from a public services standpoint. So much so that last year the town had to raise its residential property tax rates and suspend new retail construction in order to balance its budget.

More evidence comes from the city of Barnstable, Massachusetts, which recently commissioned a study to examine the tax impacts of different land uses. The study found that the city's big box stores and fast food outlets were costing more in services, particularly road maintenance, than they were generating in revenue. The study calculated that a 100,000 square foot big box store produced a net annual tax deficit of nearly \$47,000. The study also found that the city's small Main Street businesses contribute much more tax revenue than they require in services, generating additional funds for schools, parks, and other city functions.

Direct job and tax impacts are only part of what's a stake. Consider what happens to a dollar spent at a local store. Not only do profits stay in the community, but local merchants support a variety of other local businesses. They hire local accountants, printers, attorneys, web designers. They do business with the local bank. They advertise through local media outlets. They purchase goods from local producers and distributors. In this way, a dollar spent at a locally owned business creates a ripple of economic benefits, and indirectly helps to support a broad range of local jobs and opportunities.

In contrast, much of a dollar spent at a chain store leaves the community immediately. Chain stores centralize all of these functions at their head offices. They keep local spending to a minimum. They bank with big national banks. They bypass local media in favor of national advertising. They deal almost exclusively with large out-of-state companies and offer few opportunities for local firms.

We recently conducted a small study of this in Maine and estimated that only 14 percent of the dollars taken in at a big box store were re-spent in the local economy. The rest left the state, flowing to corporate headquarters and out-of-state suppliers. In contrast we found that locally owned businesses returned 45 percent of their revenue to the local economy. This means local stores contribute about three times as much to the local economy as chain stores, and thus support many more local jobs and businesses.

When we think about economic development, we tend to assume that a bookstore is a bookstore, and a grocery store is a grocery store. But in fact, ownership matters. Helping a local entrepreneur get started will mean much more for the local economy than recruiting a chain.

Yet another important economic benefit of local businesses is that, in an increasingly homogenized world—where most cities and towns are overrun with same chain stores, the same parking lots, the same kind of sprawl—those communities that have said no to cookie-cutter development and instead preserved their distinctive character and one-of-a-kind stores have an economic edge. These communities have a strong sense of local identity. They are more interesting places to live and to visit. And they are, according to a growing body of research, better able to attract entrepreneurs, relocating firms, and skilled workers, and thus are more likely to prosper over the long-term.

The proliferation of chain stores is not only undermining our local economies, but is also harming the environment. As the big boxes expand, more and more open space is

being consumed for shopping. The amount of retail store space per capita in the U.S. has grown by more than one-third over the last 15 years. Most of this new construction has been in the form of big box stores and other large shopping centers that are accessible only by car. As a result, more and more of our daily errands now require driving, which means increased air emissions and polluted runoff into our rivers and lakes.

Unlike centuries-old downtown buildings, these new shopping centers and big box stores typically last only a few years before being deemed obsolete. About one-third of all enclosed malls are now in serious financial distress. Even big box stores are going dark as companies like Target and Wal-Mart abandon existing outlets to build ever bigger stores further out. Wal-Mart alone has more than 350 vacant stores nationwide. I understand St. Croix Falls may soon become host to yet another empty Wal-Mart. It is very difficult to find new uses for these stores and they often remain vacant for years. Altogether, in the U.S., some 500 million square feet of retail space sits idle—a tremendously inefficient use of land and resources.

One final point, and perhaps most important of all, locally owned businesses build strong communities. There's much to be said for the civic value of doing business with our neighbors—people who greet us by name, send their kids to school with ours, and have a vested interest in the long-term health of the community. Local merchants are often deeply involved in community organizations and local causes. Although we hear a lot about the charitable giving of big corporations, one study found that small businesses actually give more than twice as much per employee to charitable causes as do large companies.

Altogether, it's a pretty high price to pay to save a few bucks and even that claim may not hold up to scrutiny and time. As Barnes & Noble and Borders Books have gained market share, both chains have sharply reduced the number of books they sell at a discount. Blockbuster's rental fees are higher in markets where it has a near monopoly.

Last October, the Maine Department of Human Services surveyed prescription drug prices at more than 100 pharmacies around the state. The ten lowest priced pharmacies were all independent, locally owned drugstores. National chains, including Rite Aid and CVS, had among the highest overall prices. Even more telling, prices at Wal-Mart pharmacies, which ranked somewhere in the middle overall, varied widely from one outlet to the next. Prices were lower in those markets where Wal-Mart still faces a fair amount of competition and significantly higher in those areas where it has largely eliminated local competitors.

As I've tried to demonstrate tonight, much of the conventional wisdom about the benefits of chain stores is false. So too is the notion that the growth of these stores is inevitable. Although local businesses have declined in recent years, they still control a substantial share of retail spending and command a degree of love and loyalty unmatched by their corporate counterparts. More importantly, across the country, a growing number of communities are recognizing the value of maintaining local businesses and a vibrant downtown. In the last few years, hundreds of cities and towns have said no to big box retail. Many have adopted innovative land use and economic development policies to prevent chain store sprawl, strengthen locally owned retail, and revitalize their downtowns.

The Institute for Local Self-Reliance, through our New Rules program, maintains an on-line clearinghouse of these policies at www.newrules.org. We provide assistance to community groups and elected officials working to implement these policies in their own communities. And we also publish a free email newsletter, *The Home Town Advantage Bulletin*, that tracks new research and innovative approaches.

So let me outline a few of the strategies and policies that communities are adopting to support locally owned businesses.

First, we need to level the playing field. We tend to assume that chains are beating out small businesses simply because they're more efficient and better run. But, in fact, government policy has played a major role in fostering the growth of chain stores and undermining the survival of locally owned businesses.

Chain retailers have received billions of dollars in state and local subsidies. Recent examples include \$1.1 million in tax abatements given to Walgreen's in Palm Beach County, Florida; a \$5.5 million subsidy provided by the city of Chicago for a retail development anchored by a Borders Books store; and over \$17 million in state and local incentives to underwrite Wal-mart's expansion in Maine. Rarely are public funds made available to locally owned businesses. Instead, they often see their tax dollars used to subsidize their biggest competitors.

Many state and federal tax policies favor big corporations over small businesses. Federal policy, for example, exempts internet retailers like Amazon.com and BarnesandNoble.com from collecting state and local sales taxes, which gives these companies a 5 to 8 percent price advantage over our local stores. State corporate tax rules in some 20 states including Wisconsin, enable national chains, like Toys R Us and Home Depot, to shelter part of their profits from tax liability, while local businesses must pay taxes on all of their earnings.

Failure to enforce antitrust laws has allowed chain retailers to use their market power to undermine smaller rivals. Here in Wisconsin, state authorities tracked predatory pricing at five Wal-Mart stores for nearly a decade, but in the end gave the company little more than a slap on the wrist.

These are just a few examples. At the very least, our hometown businesses deserve an equal opportunity. We need to put an end to subsidies for chain stores. We need to make our tax policies fair. And We need enforce fair competition.

The second strategy is to revise local planning and zoning rules to support local stores and prevent sprawling development. Many communities, for example, now require that any new investment and retail growth flow into areas in and around the downtown. The town of Hailey, Idaho, for example, has adopted a planning policy that requires that any vacancies or empty lots in the downtown be redeveloped before commercial growth is allowed in other areas. This ensures that new development supports the downtown and established businesses, rather than drawing consumers and commercial activity to another part of town.

Other communities have banned or limited big box stores. Dozens of cities and towns have decided that the impacts of large retailers—from traffic congestion and polluted runoff to dying downtowns and the loss of community character—are too much to bear. Examples include, Easton, Maryland, which prohibits stores over 65,000 square feet. That's about half the size of a typical Home Depot; Belfast, Maine, which bans stores over 75,000 square feet; and Hood River, Oregon, which set its limit at 50,000 square feet. Some communities have chosen even lower limits, like 20,000 square feet, which is smaller than a Barnes & Noble superstore.

Many cities and towns now require a comprehensive economic and community impact review before approving any new retail construction. We're working right now with the town of Homer, Alaska, on such a measure. Homer has a thriving downtown with lots of locally owned businesses. But the town is facing growing pressure from large chain stores. Officials are now working on an ordinance that will require proposals for stores over 15,000 square feet to undergo an impact review. The review will consider store's impact on the downtown business district, tax revenue, public services, the environment, and the character of the community. If it is determined that the store will cause substantial harm or that the costs outweigh the benefits, then the developer will be denied a permit to build.

The third strategy is to work with surrounding communities to develop a regional planning strategy. You are probably all familiar with the competition for tax base that often occurs among neighboring municipalities. The only thing that this system guarantees is that the towns that are winners today—those have the latest and greatest shopping malls—will be losers tomorrow, because some other town will soon build an even bigger and better shopping center. The only way out of this destructive cycle is to work together on a regional basis.

A good example of this comes from Cape Cod, Massachusetts. In 1990, the region's residents voted to create a regional planning body called the Cape Cod Commission. The commission must review and approve all proposals for commercial projects over 10,000 square feet. The commission's guidelines state that it should "take into account any negative impacts that the project would have on the Cape Cod economy and should encourage businesses that are locally owned." Several chains, including Wal-Mart, Costco, and Home Depot, have been turned down as a result of this process. The commission also has an economic development program that helps local businesses grow and expand.

The fourth strategy is to focus the city's economic development resources not on trying to entice big corporations, but on nurturing local businesses. Many communities are now establishing grants and revolving loan funds to help local businesses expand and new entrepreneurs get started. They are conducting market analyses to identify new opportunities for local retailers. They are providing technical assistance to help local merchants with everything from inventory control to new technologies.

Faced with a gap in the local economy, a need unfulfilled by existing stores, most towns try to attract a national chain. But that's not the only option. Last year, when Ames, a regional chain of discount department stores, closed its outlet in Middlebury, Vermont, the town had no place to buy basic affordable clothing and shoes. Instead of

courting another chain, the community provided a no-interest loan to help an existing merchant triple the size of her store, buy new inventory, and open as a downtown department store that sells basic, low-priced goods.

Finally, local businesses have joined forces in many communities and pooled their resources to launch marketing campaigns to educate residents about the importance of supporting local businesses. These campaigns have been extremely successful in places like Austin, Texas, and Boulder, Colorado. They involve things like window decals, bumper stickers, newspaper ads, and local business directories.

These are just a few examples of the innovative strategies communities are developing to rebuild their local economies. More information about all of these approaches, including actual policy language that you can download and present to your city council, is available on our web site. To stay abreast of the latest news, I encourage you to sign-up for our free electronic newsletter, *The Hometown Advantage Bulletin*. You'll find the details for both on the handout.

Thank you.*

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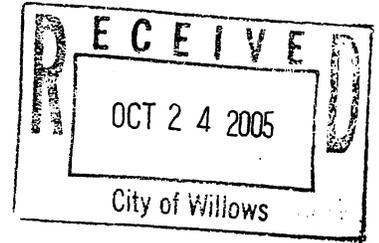
Tel: 612-379-3815

Web: <http://www.newrules.org>

Email: smitchell@ilsr.org

J

**Westside Outdoorsman
323 N. Tehama St.
P.O.Box 925
Willows, California 95988**



October 20, 2005

The City Council
City of Willows
201 N. Lassen St.
Willows, California 95988

Honorable Council Members:

I would like to submit my opinion on the Wal-Mart expansion.

J-1

When Wal-Mart came into our community they claimed they would draw out of town shoppers into local business and keep local shoppers at home.

Wal-Mart also promised to solve our unemployment problem and to increase our sales tax revenues tremendously.

My question is very simple. Is Willows better off today than before Wal-Mart arrived? I think not.

We have lost pet stores, garden stores, jewelry stores, clothing stores, farm stores and much more when you consider the families who lost their livelihoods, dreams and futures as these stores closed.

Please stop this expansion before they completely consume our community.

I hate to envision a day when we will advertise: Welcome to Willows - Visit our Wal-Mart.

Thank you for allowing my input.

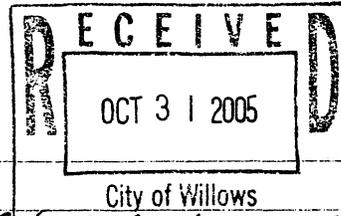
Respectfully,

A handwritten signature in cursive script that reads "Jon S. Hays".

Jon S. Hays

K

①



Oct 29, 05

Dear Mr Mistrot,

K-1

My name is Cindy Holder, I have been a resident and have worked in Willows for over 30 years.

I understand that a Wal-Mart Supercenter is going to be developed where the existing Wal-Mart is now.

I am not trying to stop development, the existing Wal-Mart does support most of our needs as it is in our community, but putting a third grocery store in this town is bad planning.

I am all for competition, but leave Wal-Mart the way it is, and bring in something new to our community that is going to fill another niche, then something that is going to drive out the businesses that are already here.

I worked 18 years as a waitress at minimum wage only 15-25 hours weekly, no benefits, trying to support 2 children, though I don't

②

K-1

proud, I needed public assistance for medical coverage for myself and my children.

When Wal-Mart first came to town, and was hiring, I applied. My thought was they were going to bring jobs and more opportunities to our community, offering benefits and room for advancement.

I wasn't the only one of my fellow co-workers that went to apply, and had a interview with Wal-Mart.

Wanting more hours, and a chance for benefits would not only make my quality of life better, but also for my children's.

I was told I was better off where I was, as was my co-workers were told also. Hearing that interview, left me feeling defeated.

I thought they were here to help people and give them an opportunity for a better quality of life and

K

(3)

K-1

to help our County by getting people, like me off of public assistance. Well I like many, thought Wrong!!

I continued working as a waitress for 4 more years until I was hired by Sani Food Market. Within 3 months, I was hired on full time (40 hrs week) with benefits. Not only medical, but dental, vision, sick leave and vacation pay.

My quality of life improved dramatically.

I disagree with Mr. Lino when he says wake up this is Willows, no one makes more than minimum wage. Believe me a lot of citizens in this community make more than minimum wage and do have benefits.

K-2

I do not believe that according to the DEIR that only 24% of sales will be taken away from the 2 existing grocery stores. I truly believe there will

K

(4)

K-2

be a bigger impact on both these stores than the report suggests.

K-3

In the case of downsizing or closure happens because of the Supercenter, you are going to see a far more people out of good paying jobs with benefits, into the unemployment lines and seeking public assistance, then you really expect. I myself will be one of them.

If I want to stay and work in Willows, I will have to go back to being a waitress, part-time at minimum wage, no benefits. My quality of life will once again change dramatically. This time for the worse.

I guess I could look for employment in Chico, but a new hire, I will not be assured of a full time (40hrs) job, wages I'm making now or benefits. Plus I will have the added expense in gas, having to commute each day.

I will not only have to start out at minimum wage,

K

(5)

K-3

but at the bottom and work my way up again to where I am now!

With the economy and job market as it is, I find myself at 48 grand and seeing that impossible.

K-4

I also feel the impact on the tire stores, Value stores, fuel stations, and other existing downtown businesses will be far more greater than expected or suggested in the DEIR.

K-5

I also feel that the Socio-Economic Analysis of the proposed Supercenter that Wal-Mart rejected shows more a realistic impact on our community than the DEIR that was submitted.

K-6

The DEIR speaks more on the environment and CEQA standards and barely touches on the impacts of the Socio-Economic factors.

K-7

The Supercenter is not going to stop people from still going to Chico for their shopping needs.

⑥

K-7

You will still be able to go to Chico and get your groceries cheaper.

You will still be able to go to Chico/Sacramento and get your electronics, appliances, furniture, fuel and vision products cheaper and may I add better quality.

Instead of a bunch of inferior products, you end up throwing away or sitting in your house, because Wal-Mart will not take them back, and you can't afford after buying it, to send a T.V. back to the factory, or the cost to take it to the dump.

Maybe Wal-Mart should have a dump station for people to take their products and have them dump them for us.

K-8

If bigger cities and communities are fighting to keep Wal-Mart Supercenters out of their towns, because of loss of businesses and jobs, then why are we allowing it to happen to us?

K

(7)

K-8

For every 2 jobs Wal-Mart creates, 3 are lost, and most of those are going to be good paying jobs with benefits, like mine. Are you prepared for this?

I urge you to look closely at the September 15, 2004 Wall Street Journal article entitled "Wal-Mart's Surge Leaves Dead Stores Behind."

I don't want this to happen to our community. I don't want to see other stores close or left behind, my friends or family lose.

I don't want my shopping choices taken away, where the Supercenter is my only choice in this town to shop.

You will then force me, and many others to then go to Chico for shopping choices. Where's your revenue now?

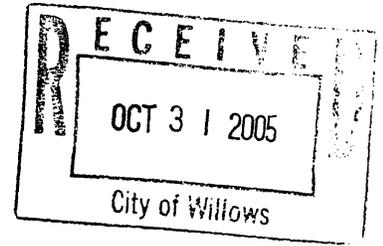
Thank you for letting me express my opinion and taking my comment into consideration.

Cindy Alder
119 S. Chover
Willows CA.

L

OCTOBER 30, 2005

TO: MIKE MISTRAT, CITY MANAGER
CITY OF WILLOWS
201 NORTH LASSEN STREET
WILLOWS, CA 95988



DEAR MR. MISTRAT:

WE WERE ONE OF THE FEW PEOPLE WHO ATTENDED THE MEETING ON 10-28.05 AT THE ROUND TABLE. WE MISSED THE MEETING AT PAT AND LARRY'S BECAUSE WE WERE OUT OF TOWN. WE ARE A RETIRED COUPLE AND OUR INTEREST IS IN THIS COMMUNITY AND TOWN. WE HAVE LIVED IN WILLOWS SINCE 1970. WE CAME HERE TO RAISE OUR FOUR CHILDREN IN A WONDERFUL SMALL COMMUNITY. BUT, WE HAVE SEEN SO MUCH CHANGES IN THE PAST FEW YEARS THAT WE ARE READY TO SEE WILLOWS GROW. OUR CHILDREN HAD TO LEAVE HERE BECAUSE THERE WERE NO JOBS FOR THEM IN THEIR FIELD. WE DESIRE TO SEE OTHER FAMILY MEMBERS IN WILLOWS NOT HAVE TO SEND THEIR CHILDREN AWAY. IF THIS CONTINUES TO HAPPEN OUR TOWN WILL DIE BECAUSE OF NO YOUNG PEOPLE TO TAKE OUR PLACE.

WE LIVE IN THE WILLOW GLENN RV AND MOBILE PARK WHERE THERE ARE MOSTLY RETIRED PEOPLE ON FIXED INCOMES. THERE FOR MOST OF US WANT THE SUPER WAL-MART TO COME IN. SOME REASONS ARE:

1. IT WILL LOWER PRICES MORE TO OUR BENEFIT.
2. IT WILL BE WITH IN A SHORT DISTANCE FOR THOSE OF US WHO WILL SOON BE TO OLD TO DRIVE MUST LONGER.
3. WE BELIEVE THAT IN TIME BY THE CITY AND THE OTHER ESTABLISHED BUSINESSES AND NEW BUSINESSES TO COME IN WILL HELP OUR TAX BASE AND PRESENT MORE JOBS.
4. WE NEED TO WORK TOGETHER TO DRAW OUTSIDE PEOPLE TO COME TO OUR TOWN. WE CAN DO THAT BY SENDING LETTERS, ADVERTISE VIA BILL BOARDS, WORD OF MOUTH.
5. OUR DOWNTOWN AREA IS IN BAD SHAPE. NEW IDEAS OF SOME KIND COULD COME THROUGH A COMMITTEE OF PEOPLE WHO ARE KNOWLEDGE WISE TO MAKE US GROW.
6. LIKE ONE OF THE GUESTS AT THIS MEETING STATED. WE NEED TO IMPROVE THE APPEARANCE IN THE DOWNTOWN. OFFER AN APPEALING BEAUTIFUL OPEN AREA THAT WILL WANT TO BE SEEN BY TOURIST AND OTHER COUNTIES. (MAKE SPECIALITY SHOPS WOULD HELP BRING THEM IN.
7. A SLOGAN POSTED AT THE FREEWAY ENTRANCES OF OUR TWO PLACES COULD ALERT THE TRAVELERS THAT WE HAVE WHAT THEY WANT.
8. WE COULD PRESENT AN ATTRACTION BY HAVING A WILD WILD WEST THEME AND FOLLOW THROUGH WITH BUILDINGS THAT HAVE THINGS LIKE THE JOY SHOP DOES.
- 9, CRAFT STORES, CANDY STORES OR FACTORY, ENTERTAINMENTS OF PLAYS, PARK BBQ OR PARADES MORE OFTEN. STREET FAIRS A COUPLE TIMES A YEAR DOWNTOWN.

WE BELIEVE THAT THE SUPER STORE WOULD HELP THIS COMMUNITY. BE A DRAWING POINT FOR OTHER BUSINESSES TO COME IN ALSO, WE NEED TO LET FAMILIES BE ABLE TO BUILD OUTSIDE THE CITY LIMITS.

L-1

L

WE REALISE THAT IT IS HARD TO MAKE CHANGES IN ONE'S LIFE. BUT IF WE ARE TO SURVIVE. WE NEED TO GROW.

L-1

MAKING MAPS OF WHAT WE HAVE TO OFFER WILL HELP BRING PEOPLE IN TO THIS TOWN. SOME BUILDING COULD BE MADE INTO COSIGNMENT BOOTHS.

WE ARE PROUD THAT WE MADE OUR MOVE TO NORTHERN CALIFORNIA THIS IS WHERE REAL PEOPLE GET CLOSE AND CAN BE FRIENDS WITH EVERY ONE.

WE HAVE THE MOUNTAINS, THE SACRAMENTO RIVER, ONLY 4 HOURS FROM THE OCEAN AND ORVILLE DAM AS ATTRACTIONS.

WE CAN DO THIS IF WE WORK TOGETHER.

THANK YOU

FART AND PAT HOOPS

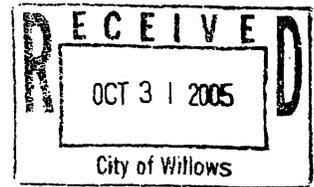
I am sorry for the type, some thing happened to my typewriter. I pray you can make out the above. We are concerned for this town, we will pray that you and others make the right decisions. A casino in Glenn County only would help a few and cause many to yield to temptation of gamble. We hope you will not vote to put one in this town.

Pat Hoops
6155 Hwy 162 #24
Willows CA 95988
(530) 934-5161

M

October 31, 2005

Mr Mike Mistrot, City Manager
City of Willows
201 N Lassen Street
Willows, CA 95988



RE: Draft Environmental Impact Report
Willows Walmart Superstore

Dear Mr. Mistrot,

The DEIR does not speak for the Willows residents who welcome a Walmart Superstore. Willows residents who presently shop out of town (Chico) will stay here. When Willows brings in more specialty and diversified stores, Willows will grow. The key to growth is community input and new ideas.

The "no growth" in downtown Willows began when the buildings on Sylamore, Butte and Johnson Streets were torn down. The City "Fathers" then did not have a vision. New land lords to the area raise rents and do not upgrade or update the buildings. Holiday Store has not upgraded its store, some Butte Street Street fronts are unattractive and the Old Theatre (Tower) and lot are a disgrace. New developers need incentives to come to Willows.

Revenues will increase with the Superstore. If Willows rejects the Superstore, it will be welcomed to the north or south of Willows and residents will travel there or to Chico. Other towns and cities near I5 are growing - "baby boomers" who will be retiring are looking for rural areas to settle; why not Willows?

Will Willows challenge itself with new growth, new ideas and new life or will Willows stay in its comfort zone of no growth?

Sincerely,
Mrs Viola M Pedersen

M-1

N

10.22.05

To Whom it may concern,

I would like to ask the planning department, the Willows City Council and anyone else involved in the Walmart Superstore decision to vote no on the issue. Willows has some wonderful, small, family owned businesses. The existing Walmart fills many of the gaps in available merchandise accessible to us. If the Superstore comes in I'm afraid of the closure of our smaller businesses. I do not want to live in a town where one store has all the commerce. Please don't let that happen.

Sincerely,

Marianne Madaraga
257 S. Enright Ave
Willows

N-1

0

10-26-05

To The City of Willows

Subject: Super WALMART

I have attended the community meeting at Pat & Larry's regarding this matter.

0-1

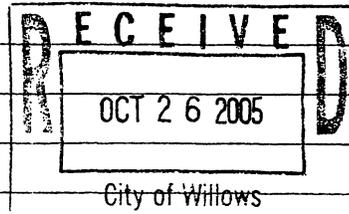
I am wholeheartly in favor of Walmart expanding to form a Super store.

I have lived here for 33 years and am now retired. Without the low prices of Walmart I don't know what I would do.

Super Walmart

John D. Winnier

JOHN D. WINNIER

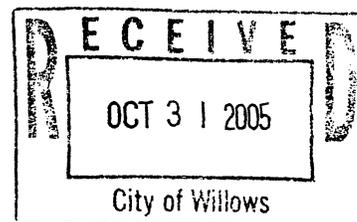


P

HOOVER H. MOCK

220 South Enright Avenue
Willows, Ca, 95988

October 30, 2005



Willows City Planning Commission
c/o City of Willows
201 North Lassen Street
Willows, California 95988

Members of Willows Planning Commission:

As a long time resident of this community I am voicing my opposition of a Super Walmart Mega Store in Willows.

P-1

Willows are going to grow as the population continues to come northward. Willows are ideal place for businesses, manufactures, and other industries to come because of the location in the heart of North-South corridor of interstate 5. My concern is what mega store will do to the downtown business community when in does grow.

The downtown business area will not grow now without some major removal of eyesores such as the Tower Theatre and the Daughtery Building. It needs a major anchor store to start the development of the downtown area. What anchor store will come into Willows with a Super Walmart located next to I-5? The downtown businesses community will continue to dwindle because the hub of new businesses will be along I-5 and Wood Street.

In the 50's Willows was a very active town. The population was just over 4.500 residents but we Had 5 automobile dealership, 3 tractor dealers, 2 lumberyards, 4 hardware stores, 3 drugstores, 5 grocery stores, 6 clothing stores, 2 jewelry stores, 3 cleaners, and much more. We had a downtown. Willows fathers decided to improve downtown area with the Downtown Redevelopment Project that destroy much of Willows old landmarks and the unique small businesses in downtown area.

I have been involved with the Willows Chamber of Commerce, Willows Rotary, and Committees formed to study the growth of businesses since the late 60's, 70's. and 80's. I my heart I have always felt that Willows business will grow back to where was in the 50's.

After Walmart came to Willows they were not part of the community as promised. They did not donate to any local organizations to help raise monies to their cause until the past two years when they wanted to put a Super Walmart in Willows. Walmart is the corporation that concerned with the bottom line.

I have read much on the effect of Walmart and Super Walmart have on area that they are located throughout our nation. They will, in the long run, will destroy the Willows business community with Their ruthless practice of "Low Price" merchandises. The practice of hiring part-time employees with little or no benefits with minimum pay will still be a burden to society. Walmart provide health benefits* only to half the employees.

Walmart continued practice to buy goods made overseas with cheap labor have destroyed America's proud "made U.S.A." industry. Walmart has upset the economy chain of business in United States.

P

P-1

The infrastructure of any community is paid for by generated tax dollars. It is true that a Super Walmart will generate a larger tax base for the city. But eventually it will cease to become a revenue, but a burden to the community.

But it will be better if we can turn monies earned in Willows 4 or 5 times at different businesses to generate that tax dollar and provide a decent job for its residents. Or spending it at Super Walmart and sending it out of State?

What major business anchor and other businesses will come to downtown Willows when they must compete with a Super Walmart?

I urge you to vote against a Super Walmart in Willows.

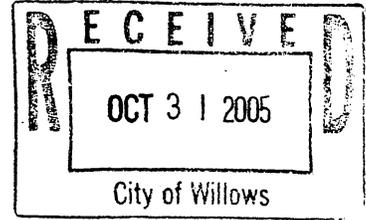
Respectfully submitted,



Hoover H Mock

*San Francisco Chronicle, Sunday October 30, 2005 front page

Q



October 25, 2005

Mr. Mike Mistrot, City Manager
City of Willows
201 North Lassen
Willows, CA 95988

RE: Draft Environmental Impact Report, Willows Super Wal-Mart

Dear Mr. Mistrot:

After reviewing the Draft Environmental Impact Report for the proposed Willows Super Wal-Mart, we offer the following comments concerning the impacts on existing City of Willows retailers, and the related urban decay determination.

Q-1

The DEIR indicates an estimated \$2.6 to \$3.7 million of general merchandise sales may be diverted from existing general merchandise stores, equivalent to support for approximately 13,000 to 18,500 square feet of general merchandise store space, assuming performance of \$200 per square foot. Due to the increased capacity and enhanced variety of goods to be available, the Super Center Store will be more competitive than the current Discount Store. Other stores will be impacted as well, but this negative impact on existing stores will depend upon their ability to sustain a temporary downturn in sales. The report indicates it is difficult to identify which general merchandise stores are at greatest risk of potential closure.

We concur that the Super Center Store will adversely impact existing retail stores and accept the \$2.6 to \$3.7 million sales diversion and inferred reduction in retail space use at 13,000 to 18,500 square feet. We also concur that it is difficult without further interaction, assessment, and evaluation to determine which stores have the ability to sustain themselves when sales decrease. However, we do not believe the downturn in sales will be temporary, but rather will remain at less than current levels for the life of the Super Center. Thus the adverse impacts will likely be chronic, affecting existing and emerging retailers in the long term.

Q-2

We do not concur with the Sedway Group's conclusions regarding the potential for urban decay. It is their contention, based primarily on telephone interviews with local real estate professionals and visits to the properties (Holiday Quality Foods, 99-Cent with Value, Safety Tire Service) most impacted by the Superstore, that due to the improving and expanding retail activities in the City of Willows, the loss of these businesses would not result in long-term vacancies or un-maintained, blighted properties. This analysis fails to consider the adverse impacts of the Super Center on long-term retail opportunities, and assumes that the existing market characterization, defined on page 26, as moderate demand for small retail and office space, will continue unaffected by the reduction in downtown retail activities caused by the Super Center.

Q

October 25, 2005
Page 2

Q-2

Thus the adverse impacts will likely be more severe and chronic leading to additional urban decay and blight within the City of Willows.

Q-3

In summation, we believe the DEIR minimizes the local retail sales and urban decay impacts and reject the tacit assumption that these impacts are best left to passive marketplace adjustments. We therefore urge a more responsive and responsible analysis of these impacts, which contain specific actions for mitigating the anticipated long-term reduction in retail sales and the anticipated vacancy of commercial properties that will result from this loss of retail sales.

We assert that an acceptable Environmental Impact Report must contain specific programs for mitigating these understated adverse impacts. Such a program should include; **A)** a more concise measurement (survey) of businesses anticipating impacts, **B)** quantification of each business' needs, capacity for change, and willingness to address competitive issues, **C)** provision of resources, technical assistance, and financial programs to address their needs, and **D)** development of organizational capacity to network and provide services in an efficient and comprehensive manner.

Thank you for considering these comments during the review process of the Draft Environmental Impact Report for the proposed Willows Super Wal-Mart.

signed,

<i>Dahlia Owen</i>	<i>employee Sani Food</i>
<small>name</small>	<small>business</small>
<i>Viola M. Ledarar</i>	<i>private citizen</i>
<small>name</small>	<small>business</small>
<i>Cynthia Holder</i>	<i>employee Sani Food</i>
<small>name</small>	<small>business</small>
<i>Loren Roberts</i>	<i>Health Pakit</i>
<small>name</small>	<small>business</small>
<i>Van G. K... ..</i>	<i>Health Pakit</i>
<small>name</small>	<small>business</small>
<i>Judith</i>	<i>employee - Health Pakit</i>
<small>name</small>	<small>business</small>

R

City Council & Planning Commission

R-1

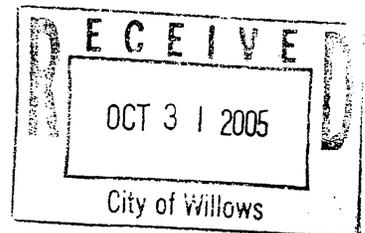
I am writing this letter as a concerned citizen, tax payer & small business employee. I am concerned about the demise of an all ready in trouble downtown area.

Citizens realize that we need development in Willows, but why can't we find a business that won't pose such a threat to already existing small businesses.

Please try and see my points and read between the lines on the EIR report and possibly not accept this.

Thank you

Debbie Owen



Mike Mistrot

From: e. roberts [roberts@box217artois.com]
Sent: Wednesday, October 05, 2005 11:58 AM
To: mmistrot@cityofwillows.org
Cc: County of Glenn, Dave Stoemaker
Subject: use permit # UO2-12, walmart draft EIR

Mike Mistrot, city manager
 City of Willows
 201 N Jassen St.
 Willows, CA. 95988
 530-934-7041

Dear Mr. Mistrot,

S-1

I met you briefly during a regular city council meeting. I have loosely reviewed the draft EIR for the proposed expansion of the current Walmart business on Highway 162. I have some concerns that I do not feel were properly addressed in the economic review of the project due to the unique situation I feel we have in being Glenn County. I also believe that a document (Safety Tire letter) was missing from one of the appendixes from the environmental impact review study.

S-2

The economic review only took in the Willows City area for the impact of this expansion. I do not feel this is adequate, fair or the proper way to address this project. I feel the entire Glenn County should have been in the economic impact review as the entire county of Glenn will be affected. I love the small home town Rural Americana atmosphere that we have in Glenn County. I have read about many communities across the United States that have embraced growth while keeping their rural small town feel within their communities. I think with proper planning and development we can have both as well.

Because we enjoy our small communities in Glenn County (not just Orland and Willows) and many want to preserve them, I am asking for additional economic impact studies for the entire County, not just the City of Willows. I would like to see a committed plan in place for the economic stability and growth of our existing small businesses, prior to the ground breaking of the proposed Walmart expansion. Lack of economic prosperity is not new to all of Glenn County and this could be the right time to address this long standing issue for everyone. If all Chambers of Commerce, all Economic Development Agencies, all City representatives, and all redevelopment agencies could pool their resources together in regards to economic issues facing current businesses, much could be accomplished. If we want to preserve our small towns that are relatively in close proximity to each other within the County, we need to look at ourselves on economic issues as a whole. I think by competing against each other, economically has been quite detrimental to the businesses we have had in the past and the businesses currently struggling to survive now. We have several smaller communities/villages not being taken into account in what they have to offer as far as potential services, assets, and resources to make this County an even greater place to live. It might also be a potential way to lower the unemployment rate are constantly fighting in the county. Having commercial stability and planned growth might also help the astronomically high residential property taxes that have been seen in the county this past year. I don't think any one wants to see Glenn county strictly as a residential area. I know current residents cannot pay for needed city or county services by residential property taxes alone, which seems the road we have been taking.

I am asking the City of Willows to ask for a new economic impact study with the boundary area being the entire Glenn County. I am for a proposed expansion, but would also like to

10/5/2005

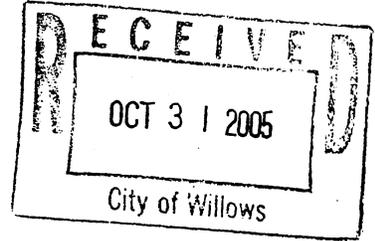
S-2

see the option of a smaller project explored more fully, prior to a final decision. This was one of the options named in the environmental impact report but was not elaborated on. If a new study can be done encompassing the entire county, maybe the board of supervisors should be consulted on some level.

Thank you for your time and consideration of my letter.

Best Regards,
edna roberts
p.o. box 217
artois, ca. 95913-0217
866-367-6858 ph/fax/meg

T



October 27, 2005

Mike Mistrot
Manager
City of Willows
201 N. Lassen Street
Willows, California 95988

Re: Walmart Super Center

Dear Mr. Mistrot:

T-1 | As previously stated in my last letter, I think a Walmart Super Center will hurt Willows more than help it. There will be a definite economic impact on what retail businesses are left in the community, especially in the downtown area where vacancy rates are presently quite high.

Then there is the "multiple" effect, such as loss of businesses may result in loss of property tax revenue, loss of rental income, etc. I purchase as much locally as I can from the local auto parts store, grocery stores, hardware store and specialty shops. My insurance agent is local, as my dentist is local. I try to support our town.

I have many loyal customers. If I close they may choose to go to Chico or elsewhere. This may lead to other businesses being affected, not just those listed in the survey.

If Safety Tire was to close, it would cost 3 employees plus a part time bookkeeper their jobs.

T

T-1

Walmart's hiring practices of 4 hour days, no overtime, no benefits for some employees, would not be equivalent to what they now earn.

What is Walmart going to add to the community? Will it advertise locally in the media? Will the store manager live in Willows?

T-2

After reading the Environmental Impact Report indicating that Safety Tire Service was at the greatest risk of closing, which I did not appreciate, I have never considered closing my 40 year old business. If I was planning on selling my business, the Environmental Impact Report, could have been very damaging. If Walmart does become a super center then my tire business my not seem like a good business for someone to purchase.

SEDWAY suggests that my empty building would not lead to general deterioration of the area. If I do not have a viable business income, I will not be able to insure, pay taxes or maintain my empty structure. This will have the same effect on other property owners, as well. How will Willows look with boarded and broken windows, graffiti, perhaps arson opportunities?

It is ridiculous that a business invest several thousands of dollars for new equipment, such as a smog machine, car wash, as suggested by SEDWAY. It would be absurd to indebt my business with such an expense, when Walmart will most certainly provide similar services.

T-3

As far as remediation of this facility, there are no environmental issues that need to be addressed. The tire shop was previously a beer warehouse. There are no typical auto business issues, such as oil drains, tanks or spills.

T-4

It is just like Pacific Municipal Consultants to use a cookie cutter approach to Willows. Such as the definition of "Urban Decay". That definition works well in a large

T

T-4

urban area, but that is a matter of degree. What is insignificant in Inglewood, California IS significant in Willows, California.

T-5

This report fails to access the cumulative report of a Walmart Super Center to the Business Community. Such as the general appearance of the downtown area, effects of new industry coming to the area because of no businesses in Willows, except for the Walmart. This domino effect will lead to blight.

T-6

Finally if I do close there will be four empty buildings out of five at the intersection of Colusa and Sycamore Streets.

What happens when there are no local businesses left?

If you go down memory lane, there once was a lovely town by the name of Willows. Let see, there was a Sears Catalogue Store, a huge Willows Department Store, known up and down the valley, Fitzpatrick Auto Center, Ben Franklin variety store and an A & W Root Beer Stand. . .

Sincerely,



BOB SAINT-EVENS, Owner
Safety Tire Service, Inc.

Cc: Planning Department
City of Willows

Willows City Planning Commission
Oct 24, 2005

Commissioners;

I am enthusiastically in favor of Willows Wal Mart becoming a Super Center.

For the 13 years that I have lived in Willows I've heard "Growth & jobs" as the theme from City & County officials. Now, here is a large corporation willing to spend big money to enlarge their store that will (and does) provide "Growth & jobs" and there is some doubt whether or not "we" will let it happen?

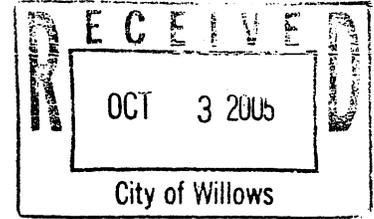
You've heard all the pros & cons, I won't list them again. But I ask you, if you driving on I 5 going from point A to B, is there any store in downtown Willows for which you would leave I 5 to visit? Wal Mart, Gas Stations & Fast Food restaurants to this forum.

There is room in Willows for quality independent merchants and a Wal Mart Super Center - "Growth & jobs!"

(LAURA SCHAUER
853 N. BUTTE ST
WILLOWS)

Laura Schauer

V



Shirley Shumin
1250 W. Sycamore St., #4
Willows, CA 95988

September 30, 2005

City of Willows
201 N. Lassen St.
Willows, CA 95988

Dear City Councilmen:

I was unable to attend the "Town Hall Meeting" which you held regarding the desirability of allowing Wal*Mart to build a Super Center here in Willows.

V-1

I have lived in Willows for most of my life. I went to school here and have worked all my adult years here. I believe in Willows and its lifestyle; in its innate welcoming goodness and the people who call Willows 'home'. We are interested, intelligent and caring.

I know there have been some expressed concerns about some business 'being forced to close down', however, I believe that any business which does close down will do so because they either would have anyway or they didn't want to cinch in the 'profit margin' they'd been used to in order to be competitive.

V-2

I believe the 'endangered' species (a hawk) is not limited to the specific site identified for the proposed Super Center, but rather, the greater central valley. But that aside, the monies which Glenn County residents spend in Chico now (especially for food) will be coming back to Willows (and it's tax coffers), not only because Wal*Mart will provide beyond what people can imagine but they won't have to drive to Chico to shop. And with the cost of gas being what it is, this is a great incentive to shop local.

V-3

I guess what I want to say is: I APPROVE OF THE WAL*MART SUPER CENTER FOR WILLOWS.

Thank you for your time and your interest in my opinion.

Sincerely,

A handwritten signature in cursive script that reads "Shirley Shumin".

Shirley Shumin

ATTACHMENTS

The following attached reports by Robert A. Karn & Associates are added to EIR *Appendix E – Hydrology Reports* and constitute replacements for the report contained in Appendix E of the Draft EIR.

- *Hydrology/Hydraulics Review (Willows Wal-Mart)*, Revised November 16, 2005.
- *Hydrology Calculations for On-Site Storm Drain – Wal-Mart Store #2053-02, Willows, California*, Revised December 29, 2005.
- *Hydrology Calculations for Detention Pond – Wal-Mart Store #2053-02, Willows, California*, Revised July 9, 2004.

HYDROLOGY/HYDRAULICS REVIEW

INTRODUCTION

This overview is being prepared for the expansion of the existing Wal-Mart Store on the State Route Highway 162 in the City of Willows, CA for the purpose of investigating the existing and proposed storm drainage conditions and associated impacts to the region.

PROJECT LOCATION

The project site is located at 470 Airport Avenue in the City of Willows, Glenn County, California. The project site encompass 20.0 ± acres which is located to the west side of I-5 and to the north side of Highway 162 with farmland to the north and to the west side of the property, and Glenn County Airport is located directly South across Highway 162. The project site is in a Zone -C area of minimal flooding per the Flood Insurance Rate Map, Glenn County, California (Unincorporated Areas) Panel 589 of 850 Community-Panel Number 060057 0589 B Effective Date September 03,1980 prepared by Federal Emergency Management Agency (FEMA)

EXISTING CONDITIONS

The project site consists of approximately 20 acres. The existing Wal-Mart Store and the proposed 1.1 acre Parcel B development incorporate approximately 11 acres.

The proposed Wal-Mart expansion development will be constructed on approximately 9.4 ± acres of existing farmland located immediately behind the rear of the existing Wal-Mart Store.

Off-site Storm Drainage

The existing off-site storm drainage system was constructed with the development of the existing Wal-Mart Store. The design for this system is included in the Drainage Study for Rosolia Property, Willows, CA, dated February 19, 1993, as prepared by Laugenour and Meikle Civil Engineers and plans entitled "Improvement Plans for North Airport Road, dated April 1993, prepared by Laugenour and Meikle Civil Engineers".

The off-site storm drainage system consists of an existing 27" storm drain pipe located in North Airport Avenue and a detention pond located at the southwest corner of the site. The detention pond drains to an existing 36" storm drain pipe that runs easterly along Highway 162 and ultimately discharges to an existing swale adjacent to the south bound on ramp to I-5.

The existing detention pond has been constructed to store 4.64 acre feet, which is the runoff equivalent to the 100 year, 24 hour event for existing 13.5 acres of development.

On-Site Storm Drainage

The on-site storm drainage system was constructed with the development of the Wal-Mart Store. The design for this system is included in the calculations prepared by Bissell & Karn, a Greiner Engineering Company as revised on February 17, 1993.

The on-site storm drainage system consists of an underground pipe system sized to contain the 10-year storm. The site was divided into two watersheds. The easterly watershed consists of approximately 8.25 acres that drains directly to an existing 42" storm drain pipe at the southeastern corner of the site. The 42" storm drain pipe ultimately discharges into an existing swale adjacent to the south bound on-ramp to I-5.

The westerly watershed consists of approximately 4.35 ± acres of developed runoff and approximately 10.5 ± acres of farmland. The westerly watershed is collected in an underground pipe system and drains directly into the existing 4.64 acre foot detention pond.

PROPOSED CONDITIONS

As part of the project, the on-site underground storm drainage system will be extended to collect the runoff from the expansion area and the existing detention pond will be expanded to accommodate the storm drain runoff from the 10.5 ± acre expansion area.

The site will continue to be separated into two watersheds. The easterly watershed will continue to outfall into the 42" storm drain pipe and will not experience an increase in storm water runoff based upon the 10 or 100 year storm. See Table A below for the calculated flow rate.

**TABLE A
 EASTERN WATERSHED FLOW RATES**

	PRE EXPANSION	POST EXPANSION
Q 10	9.9 cfs	8.8 cfs
Q 100	18.2 cfs	14.7 cfs

The on-site storm drainage system within the eastern watershed has been sized to convey the 100 year storm event to eliminate an overland drainage release into the I-5 right of way. Therefore, with a net decrease in post expansion flow and no overland discharge, there is no impact to the downstream drainage facility by the easterly watershed.

The on-site storm drainage pipes in the westerly watershed will be extended to collect the expansion area. The westerly watershed has been increased to 11.5 ± acres.

The increase in storm runoff created by the expanded watershed will be collected by the underground storm drainage system and outfall in an expanded detention pond. The existing detention pond will be increased by 3.79 acre-feet, bringing it to a total of 8.43 acre-feet for the 100 year, 24 hour event. Therefore, there is no impact to the downstream drainage facility by the western watershed.

SUMMARY OF METHODOLOGY

The Hydrology Calculations for the Expansion of the Existing Detention Pond is designed using the method outlined in the Soil Conservation Service (SCS) Technical Release No. 55 (TR-55). Type 1 Storm Distribution and the 100-year precipitation value of 5.0 inches. The Post- development hydrograph was run based on the fully developed condition using an SCS Soil No. 95. The SCS soils numbers were selected using SCS Soil type D which best represents the type of soil present in the project location. The Hydrograph is prepared by using computer generated Pond pack software prepared by Haestad Methods.

This methodology is consistent with the Laugenour and Meikle Civil Engineers drainage Study for the Rosolia property.

Therefore, there is no impact to the downstream drainage facility for the westerly and easterly watershed.

Hydrology Calculations For On-Site Storm Drain

Prepared For:

WAL-MART STORE #2053-02
WILLOWS, CALIFORNIA.

Dated:
June 21, 2004
Rev. 12-29-05



Prepared by
ROBERT A. KARN & ASSOCIATES, INC.
707 Beck Avenue
Fairfield, CA 94533

Job#A01110

Executive Summary

Introduction

This is the Hydrology Calculations for the Expansion of the Existing Wal-Mart Store located at 470 Airport Avenue in the City of Willows, California. BISSELL AND KARN A GREINER ENGINEERING COMPANY designed the On-Site Storm Drain system for the existing facility. New calculations have been prepared that compare the pre and post expansion flows for the 10 and 100 year event for the project.

Summary of Methodology

The On-Site Storm Drain is designed using the Rational Method and 100-Year, Rainfall Intensity is calculated per the City of Willows Intensity-Duration-Frequency Curves. The initial time of concentration for roof to gutter is considered as 5 minutes. The HGL at the connection point is taken from the previous calculations and copy of which is attached here.

Calculation & Reference Attached:

1. Calculations
2. Hydrology Map
3. Reference
 - a. City of Willows Intensity-Duration-Frequency Curves
 - b. Calculation & Hydrology map by BISSELL AND KARN A GREINER ENGINEERING COMPANY.

Conclusion

The site will continue to be separated into two watersheds. The easterly watershed will continue to outfall into the 42" storm drain pipe and will not experience an increase in storm water runoff based upon the 10 or 100 year storm. See Table A below for the calculated flow rates.

**TABLE A
EASTERN WATERSHED FLOW RATES**

	PRE EXPANSION	POST EXPANSION
Q 10	9.9 cfs	9.6 cfs
Q 100	18.2 cfs	18.2 cfs

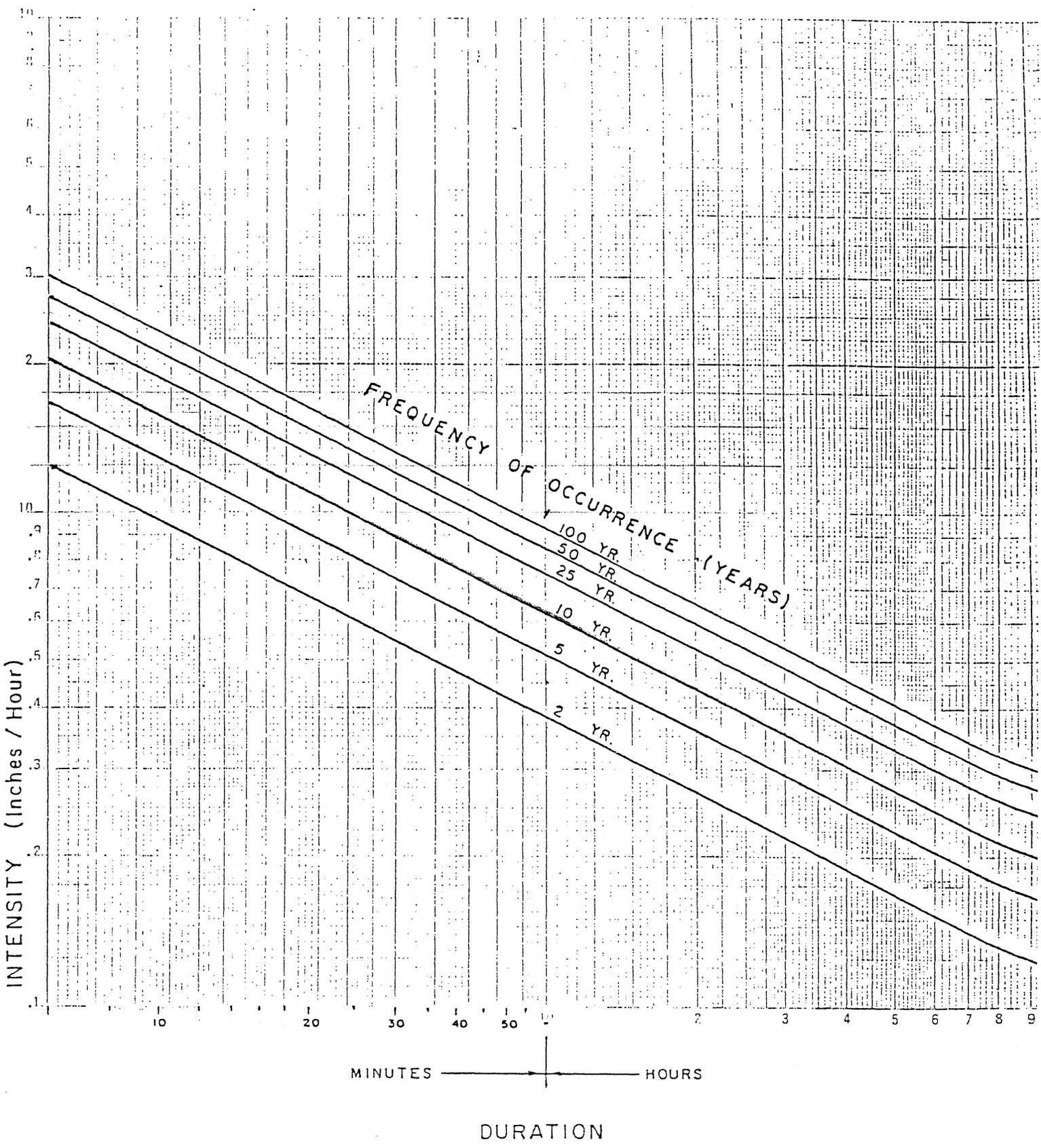
The on-site storm drainage system within the eastern watershed has been sized to convey the 100 year storm event to eliminate an overland drainage release into the I-5 right of way. Therefore, with a net decrease in post expansion flow and no overland discharge, there is no impact to the downstream drainage facility by the easterly watershed.

The on-site storm drainage pipes in the westerly watershed will be extended to collect the expansion area.

The increase in storm runoff created by the 10.94 acres of new development will require increasing the existing detention pond by 3.89 acre-feet, bringing it to a total of 8.53 acre-feet for the 100 year, 24 hour event (Reference Hydrology Calculations for Detention Pond, prepared by Robert A.Karn & Associates, Inc, as revised through July 09,2004). Therefore, there is no impact to the downstream drainage facility created by the development in the western watershed.

CITY OF WILLOWS

INTENSITY - DURATION - FREQUENCY CURVES



FORMULATED FROM VOLUME II BULLETIN No. 193
DEPT. OF WATER RESOURCES OCT. 1976
FROM WILLIAMS & BLACK BUTTE STATIONS

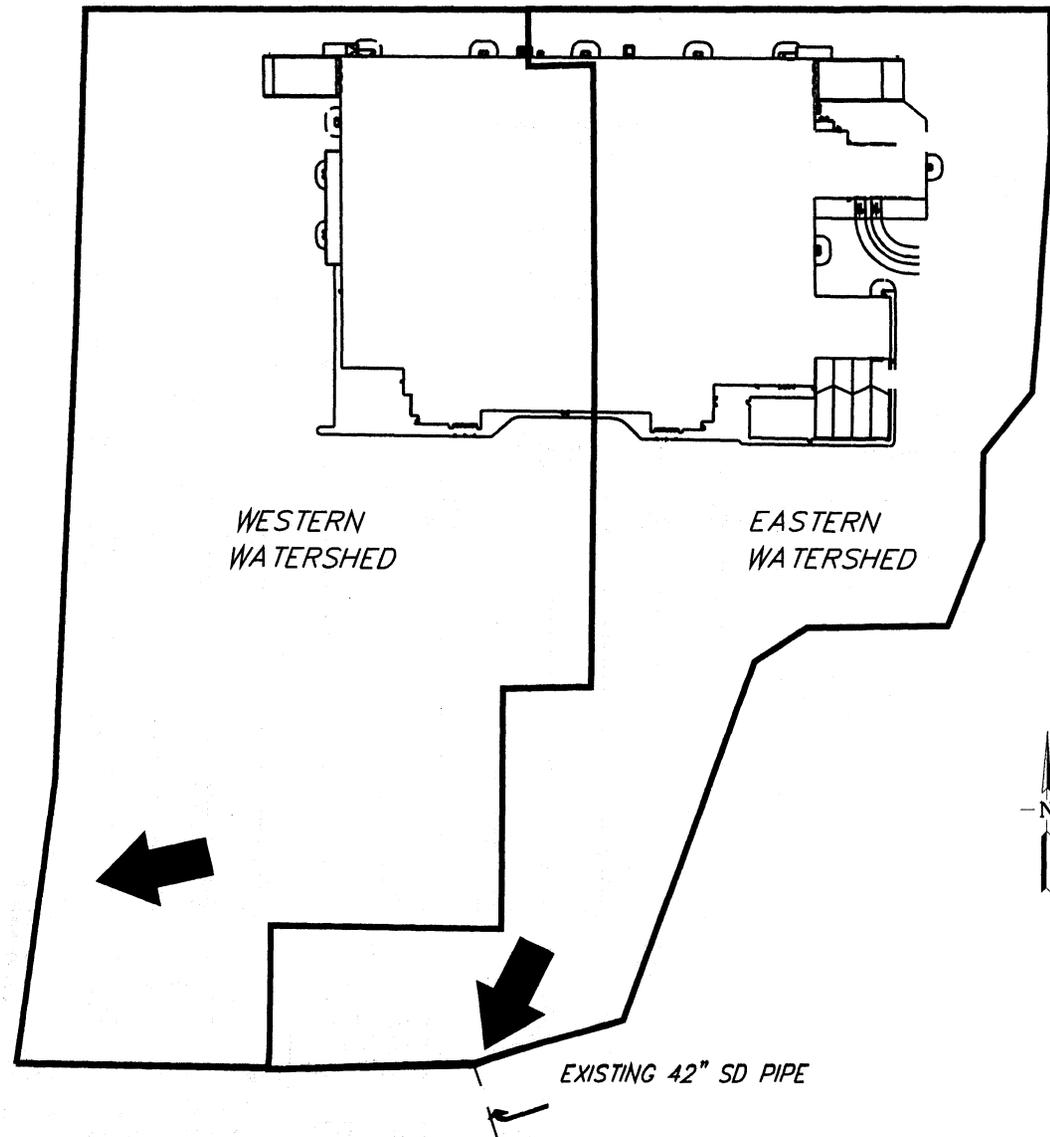
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NOVEMBER 29,2005

WAL-MART – WILLOWS, CA
WATERSHEDS AND OUTFALL

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POND

WATERSHEDS
AND OUTFALL

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WAL-MART – WILLOWS, CA

HYDROLOGY MAP

POST EXPANSION

10 & 100 YEAR

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WAL-MART - WILLOWS, CA

EASTERN WATERSHED

10 YEAR

POST EXPANSION

PROJECT

WAL-MART
WILLOWS, CA

EASTERN WATERSHED
POST EXPANSION

JOB # AD110

DATE: 12/29/05

SHEET 1 OF 2

10 YEAR

PT #	AREA DESC.	A	C	AC	ΣA	ΣAC	Tc	I ₁₅	Q ₁₅	DIAM	Sf	L	V	ΔT	LOSS	HGL	HGL +1	DESIGN GRATE
1A		2.15	0.9	1.94	-	-	5	1.7	3.3							136.72	137.72	140.60
										15"	0.0026	102	2.7	0.63	0.3			
2A		0.24	0.9	0.22	2.39	2.15	5.63	1.69	3.6							136.42	137.42	140.70
										15"	0.003	121	2.9	0.70	0.34			
3A		0.20	0.9	0.18	2.59	2.3	6.33	1.59	3.66							136.08	137.08	138.80
										18"	0.001	228	2.04	1.86	0.23			
4A		0.90	0.9	0.81	3.49	3.14	8.2	1.5	4.71							135.85	136.85	138.50
										24"	0.0004	244	1.5	2.7	0.1			
5A		1.45	0.9	1.31	4.94	4.45	10.9	1.39	6.2							135.75	136.75	138.30
										24"	0.0007	288	2.0	2.4	0.2			
6A		0.85	0.9	0.765	5.79	5.21	13.3	1.26	6.7							135.55	136.55	138.30
										24"	0.0008	150	2.13	1.2	0.12			
7A		1.43	0.9	1.3	-	-	5	1.7	2.21							135.63	136.63	138.10
										12"	0.003	63	2.8	0.38	0.2			
8A		-	-	-	7.22	6.5	14.88	1.2	7.8							135.43	136.43	139.10
										24"	0.001	77	2.5	0.5	0.08			

PROJECT

WAL-MART
WILLOWS, CA

EASTERN WATERSHED
POST EXPANSION
10 YEAR

JOB # A01110

DATE: 12/29/05

SHEET 2 OF 2

PT #	AREA DESC.	A	C	AC	ΣA	ΣAC	Tc	I ₁₅	Q ₁₅	DIAM	Sf	L	V	ΔT	LOSS	HGL	HGL +1	DESIG N GRATE
J2		-	-	-	7.22	6.5	14.88	1.2	7.8							135.43	136.43	137.10
										24"	0.001	77	2.5	0.5	0.08			
8A		0.59	0.9	0.53	7.81	7.03	15.38	1.18	8.3							135.35	136.35	137.64
										27"	0.0009	314	2.1	2.5	0.022			
9A		1.13	0.9	1.02	8.94	8.05	17.88	1.13	9.1							135.13	136.13	136.62
										27"	0.0008	186	2.4	1.3	0.15			
10A		0.69	0.9	0.62	9.63	8.7	19.18	1.1	9.6							134.98	135.98	137.46
										27"	0.001	20	2.5	0.13	0.02			
							19.31		9.6							134.96	135.96	138.0

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WAL-MART - WILLOWS, CA

EASTERN WATERSHED

100 YEAR

POST EXPANSION

PROJECT

WAL - MART
WILLOWS, CA

EASTERN WATERSHED
POST EXPANSION

JOB # A01110

DATE: 12/29/05

SHEET 1 OF 2

100 YEAR

PT #	AREA DESC	A	C	AC	ΣA	ΣAC	Tc	I ₁₅	Q ₁₅	DIAM	Sf	L	V	ΔT	LOSS	HGL	HGL +1	DESIGN GRATE
1A		2.15	0.9	1.94	-	-	5	2.7	5.24							139.49	140.29	140.60
										15"	0.0065	102	4.3	0.4	0.66			
2A		0.24	0.9	0.22	2.39	2.15	5.4	2.68	5.76							138.83	139.83	140.70
										15"	0.003	121	4.7	0.43	0.36			
3A		0.20	0.9	0.18	2.59	2.3	5.83	2.63	6.05							138.47	139.47	138.80
										18"	0.003	228	3.43	1.11	0.68			
4A		0.90	0.9	0.81	3.49	3.14	6.94	2.58	8.1							137.79	138.79	138.50
										24"	0.001	244	2.6	1.56	0.24			
5A		1.45	0.9	1.31	4.94	4.45	8.5	2.52	11.2							137.55	138.55	138.30
										24"	0.002	288	3.6	1.3	0.58			
6A		0.85	0.9	0.765	5.79	5.21	9.8	2.45	12.8							136.97	137.97	138.30
										24"	0.003	150	4.1	0.6	0.45			
J2							10.4		12.8							135.62	136.62	139.10
7A		1.43	0.9	1.3	-	-	5	2.7	3.51							137.09	138.09	138.10
										12"	0.009	63	4.4	0.24	0.57			
J2		-	0.9	-	7.22	6.5	10.64	2.35	15.3							136.52	137.52	139.10
										24"	0.004	77	4.8	0.26	0.31			

WAL-MART

EASTERN WATERSHED

JOB# A01110

PROJECT

WILLOWS, CA

POST EXPANSION

DATE: 12/29/05

100 YEAR

SHEET 2 OF 2

PT #	AREA DESC.	A	C	AC	ΣA	ΣAC	Tc	I ₁₅	Q ₁₅	DIAM	Sf	L	V	ΔT	LOSS	HGL	HGL +1	DESIGN GRATE
J2		-	-	-	7.22	6.5	10.64	2.35	15.3							136.52	137.52	139.10
										24"	0.002	77	4.8	0.26	0.31			
8A		0.59	0.9	0.53	7.81	7.03	10.9	2.3	16.2							136.21	137.21	137.64
										27"	0.002	314	4.3	1.21	0.63			
9A		1.13	0.9	1.02	8.94	8.05	12.11	2.2	17.7							135.58	136.58	136.62
										27"	0.003	186	4.67	0.66	0.56			
10A		0.69	0.9	0.62	9.63	8.7	12.73	2.1	18.2							135.02	136.02	137.46
										27"	0.003	20	4.5	0.07	0.06			
							12.84		18.2							134.96	135.96	138.0

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WAL-MART - WILLOWS, CA

WESTERN WATERSHED

10 YEAR

POST EXPANSION

PROJECT WAL-MART
WILLOWS, CA

WESTERN WATERSHED
POST EXPANSION
10 YEAR

JOB # A01110
DATE: 12/29/05
SHEET 1 OF 1

PT #	AREA DESC.	A	C	AC	ΣA	ΣAC	Tc	I ₁₅	Q ₁₅	DIAM	Sf	L	V	ΔT	LOSS	HGL	HGL +1	DESIG N GRATE
1B		2.4	0.9	2.16	2.16	-	5	1.7	3.7							138.16	139.16	139.60
										18"	0.001	198	2.1	1.6	0.2			
2B		0.34	0.9	0.3	2.74	2.4	6.6	1.65	3.96							137.96	138.96	139.20
										18"	0.0014	242	2.25	1.8	0.34			
3B		0.78	0.9	0.72	3.5	3.1	8.4	1.5	4.65							137.62	138.62	138.60
										18"	0.002	200	2.6	1.3	0.4			
4B		1.14	0.9	1.02	4.64	4.1	9.7	1.46	6.0							137.22	138.22	138.50
										24"	0.0007	280	2.0	2.3	0.2			
outlet							12		6.0							137.02	138.02	137.34
5B		2.3	0.9	2.07	-	-	5	1.7	3.52							136.5	137.5	137.30
										18"	0.0011	244	2.0	2.0	0.27			
6B		1.18	0.9	1.06	3.48	3.1	7.0	1.59	5.0							136.23	137.23	137.30
										24"	0.0005	171	1.6	1.8	0.08			
outlet							8.8		5.0							136.15	137.15	137.5

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WAL-MART - WILLOWS, CA

WESTERN WATERSHED

100 YEAR

POST EXPANSION

WAL-MART
WILLOWS, CA

WESTERN WATERSHED
POST EXPANSION
100 YEAR

JOB # A01110
DATE: 12/29/05
SHEET 1 OF 1

PROJECT

PT #	AREA DESC.	A	C	AC	ΣA	ΣAC	Tc	I ₁₅	Q ₁₅	DIAM	Sf	L	V	ΔT	LOSS	HGL	HGL +1	DESIGN GRATE
1B		2.4	0.9	2.16	2.16	-	5	2.7	5.8							139.47	140.147	137.60
										18"	0.003	198	3.3	1.0	0.6			
2B		0.34	0.9	0.3	2.74	2.4	6.0	2.45	5.9							138.87	139.87	139.20
										18"	0.0031	242	3.35	1.2	0.75			
3B		0.78	0.9	0.72	3.5	3.1	7.2	2.3	7.1							138.12	139.12	138.60
										18"	0.004	200	4.05	0.8	0.8			
4B		1.14	0.9	1.02	4.64	4.1	8.0	2.1	8.6							137.32	138.12	138.50
										24"	0.001	280	2.74	1.7	0.3			
outlet							9.7		8.6							137.02	138.02	137.34
5B		2.30	0.9	2.07	-	-	5	2.7	5.5							136.8	137.8	137.30
										18"	0.002	244	3.1	1.32	0.48			
6B		1.18	0.9	1.06	3.48	3.1	6.32	2.35	7.2							136.32	137.32	137.30
										24"	0.001	171	2.3	1.24	0.17			
outlet							7.56		7.2							136.15	137.15	137.5
					ΣA				8.100									
					8.42	Total			15.8 cfs									

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NOVEMBER 29, 2005

WAL-MART – WILLOWS, CA

BISSELL & KARN

PRE EXPANSION

10 & 100 YEAR

Hydrology Calculations For Detention Pond

Prepared For:

WAL-MART STORE# 2053-02
WILLOWS, CALIFORNIA.

Dated:

June 21, 2004

Revised: July 01, 2004

Revised July 09, 2004

Prepared by
ROBERT A. KARN & ASSOCIATES, INC.
707 Beck Avenue
Fairfield, CA 94533

Job#A01110

Executive Summary

Introduction

This is the Hydrology Calculations for the Expansion of the Existing Wal-Mart Store on the State Route Highway 162 in the City of Willows, California. The previous Detention Pond was designed per the Drainage Study report entitled *DRAINAGE STUDY for ROSOLIA PROPERTY WILLOWS, CALIFORNIA* dated February 1993 prepared by LAUGENOUR AND MEIKLE CIVIL ENGINEERS. The existing Detention Pond has a capacity of 4.64 acre-feet

Summary of Methodology

The Hydrology Calculations for the Expansion of the Existing Detention Pond is designed using the method outlined in the Soil Conservation Service (SCS) Technical Release No. 55 (TR-55). Type 1 Storm Distribution and the 100-year precipitation value of 5.0 inches. The Post-development hydrograph was run based on the fully developed condition using an SCS Soil No. 95. The SCS soils numbers were selected using SCS Soil type D which best represents the type of soil present in the project location. The Hydrograph is prepared by using computer generated Pond pack software prepared by Haestad Methods.

Conclusion

Existing Detention Pond is to be increased in size by 3.89 acre-feet, the addition in the Runoff equivalent to the 100-Year, 24 Hour event from the 10.94 acres, Expansion of Wal-Mart Store and Offsite Road Improvement.

Calculation & Reference Attached:

1. Calculations
2. Hydrology Map
3. Reference
 - a. Approximate Geographic Boundaries for SCS Rainfall Distribution (Figure-B2)
 - b. Precipitation Depth-Duration-Frequency Table.
 - c. Hydrological Soil Groups and Table 2-2a Runoff curve numbers for urban areas.

Job File: S:\A01110\HYDROL~1\PPK\PRE-POST.PPK
Rain Dir: S:\A01110\HYDROL~1\WILLOW\

=====
JOB TITLE
=====

WAL-MART
WILLOWS CALIFORNIA

Type.... TR-55 Tabular Hyd.Input Data
 Name.... POST-100 Tag: 100

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 Title... DEVELOPED
 HYG Dir = S:\A01110\HYDROL~1\PPK\
 HYG file = PRE-POST.HYG POST-100 100

TR-55 TABULAR HYDROGRAPH METHOD
 TYPE I Distribution
 100yr, 24hr Rainfall Depth = 5.00 in

Total Area = 10.940 acres or .017094 sq.mi.
 Peak Discharge = 15 cfs

>>>> Input Parameters Used to Compute Hydrograph <<<<

Subarea Description	AREA (acres)	CN	Tc (hrs)	* Tt (hrs)	Precip. (in)	Runoff (in)	Ia/p input/used
EXPANSION	10.940	95.0	1.0000	.0000	5.00	4.42	I.02 .10

* Travel time from subarea outfall to composite watershed outfall point.
 I -- Subarea where user specified interpolation between Ia/p tables.

>>>> Computer Modifications of Input Parameters <<<<

Subarea Description	Input Values		Rounded Values		Ia/p Interpolated	Ia/p Messages
	Tc (hrs)	* Tt (hrs)	Tc (hrs)	* Tt (hrs)	(Yes/No)	
EXPANSION	1.0000	.0000	**	**	No	Computed Ia/p < .1

* Travel time from subarea outfall to composite watershed outfall point.
 ** Tc & Tt are available in the hydrograph tables.

Type.... TR-55 Tabular Hyd.Peaks
Name.... POST-100 Tag: 100

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Title... DEVELOPED
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HYG file = PRE-POST.HYG POST-100 100

TR-55 TABULAR HYDROGRAPH METHOD
TYPE I Distribution
100yr, 24hr Rainfall Depth = 5.00 in

>>>> Summary of Subarea Times to Peak <<<<

Subarea	Peak Discharge at Composite Outfall (cfs)	Time to Peak at Composite Outfall (hrs)
EXPANSION	15	10.8
Composite Watershed	15	10.8

Type.... TR-55 Tabular Hyd.Summary
 Name.... POST-100 Tag: 100

File.... S:\A01110\HYDROL~1\PPK\PRE-POST.PPK
 Title... DEVELOPED
 HYG Dir = S:\A01110\HYDROL~1\PPK\
 HYG file = PRE-POST.HYG POST-100 100

TR-55 TABULAR HYDROGRAPH METHOD
 TYPE I Distribution
 100yr, 24hr Rainfall Depth = 5.00 in

Composite Hydrograph Summary (cfs)

Subarea Description	9.0 hr	9.3 hr	9.6 hr	9.9 hr	10.0 hr	10.1 hr	10.2 hr	10.3 hr	10.4 hr
EXPANSION	1	1	2	3	3	3	4	6	8
Total (cfs)	1	1	2	3	3	3	4	6	8

Subarea Description	10.5 hr	10.6 hr	10.7 hr	10.8 hr	11.0 hr	11.2 hr	11.4 hr	11.6 hr	11.8 hr
EXPANSION	10	12	14	15	14	12	9	8	6
Total (cfs)	10	12	14	15	14	12	9	8	6

Subarea Description	12.0 hr	12.3 hr	12.6 hr	13.0 hr	13.5 hr	14.0 hr	14.5 hr	15.0 hr	15.5 hr
EXPANSION	6	5	4	4	3	3	3	2	2
Total (cfs)	6	5	4	4	3	3	3	2	2

Subarea Description	16.0 hr	17.0 hr	18.0 hr	20.0 hr	24.0 hr
EXPANSION	2	2	2	2	1
Total (cfs)	2	2	2	2	1

Type.... TR-55 Tabular Hyd.Total
Name.... POST-100 Tag: 100

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HYG file = PRE-POST.HYG POST-100 100

TR-55 TABULAR HYDROGRAPH METHOD
TYPE I Distribution
100yr, 24hr Rainfall Depth = 5.00 in

COMPOSITE OUTFALL HYDROGRAPH

WARNING: Hydrograph truncated on left and right side.

Time (hrs)	Flow (cfs)	Time (hrs)	Flow (cfs)
9.0	1	12.8	4
9.1	1	12.9	4
9.2	1	13.0	4
9.3	1	13.1	4
9.4	1	13.2	4
9.5	2	13.3	3
9.6	2	13.4	3
9.7	2	13.5	3
9.8	3	13.6	3
9.9	3	13.7	3
10.0	3	13.8	3
10.1	3	13.9	3
10.2	4	14.0	3
10.3	6	14.1	3
10.4	8	14.2	3
10.5	10	14.3	3
10.6	12	14.4	3
10.7	14	14.5	3
10.8	15	14.6	3
10.9	14	14.7	3
11.0	14	14.8	2
11.1	13	14.9	2
11.2	12	15.0	2
11.3	10	15.1	2
11.4	9	15.2	2
11.5	9	15.3	2
11.6	8	15.4	2
11.7	7	15.5	2
11.8	6	15.6	2
11.9	6	15.7	2
12.0	6	15.8	2
12.1	6	15.9	2
12.2	5	16.0	2
12.3	5	16.1	2
12.4	5	16.2	2
12.5	4	16.3	2

12.6	4	16.4	2
12.7	4	16.5	2

S/N: HOMOL0102006 Robert A. Karn & Associates, Inc.
Pond Pack Ver: 8-01-98 (61) Compute Time: 14:56:08

Date: 07-09-2004

Type.... TR-55 Tabular Hyd.Total
Name.... POST-100 Tag: 100

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Title... DEVELOPED
HYG Dir = S:\A01110\HYDROL~1\PPK\
HYG file = PRE-POST.HYG POST-100 100

TR-55 TABULAR HYDROGRAPH METHOD
TYPE I Distribution
100yr, 24hr Rainfall Depth = 5.00 in

COMPOSITE OUTFALL HYDROGRAPH

Time (hrs)	Flow (cfs)	Time (hrs)	Flow (cfs)
16.6	2	20.4	2
16.7	2	20.5	2
16.8	2	20.6	2
16.9	2	20.7	2
17.0	2	20.8	2
17.1	2	20.9	2
17.2	2	21.0	2
17.3	2	21.1	2
17.4	2	21.2	2
17.5	2	21.3	2
17.6	2	21.4	2
17.7	2	21.5	2
17.8	2	21.6	2
17.9	2	21.7	2
18.0	2	21.8	2
18.1	2	21.9	2
18.2	2	22.0	2
18.3	2	22.1	1
18.4	2	22.2	1
18.5	2	22.3	1
18.6	2	22.4	1
18.7	2	22.5	1
18.8	2	22.6	1
18.9	2	22.7	1
19.0	2	22.8	1
19.1	2	22.9	1
19.2	2	23.0	1
19.3	2	23.1	1
19.4	2	23.2	1
19.5	2	23.3	1
19.6	2	23.4	1
19.7	2	23.5	1
19.8	2	23.6	1
19.9	2	23.7	1
20.0	2	23.8	1
20.1	2	23.9	1
20.2	2		
20.3	2		

Type.... Vol.Est: Peak Estimate
Name.... EST.VOL 10

File.... S:\A01110\HYDROL~1\PPK\PRE-POST.PPK
Title... WAL-MART WILLOWS

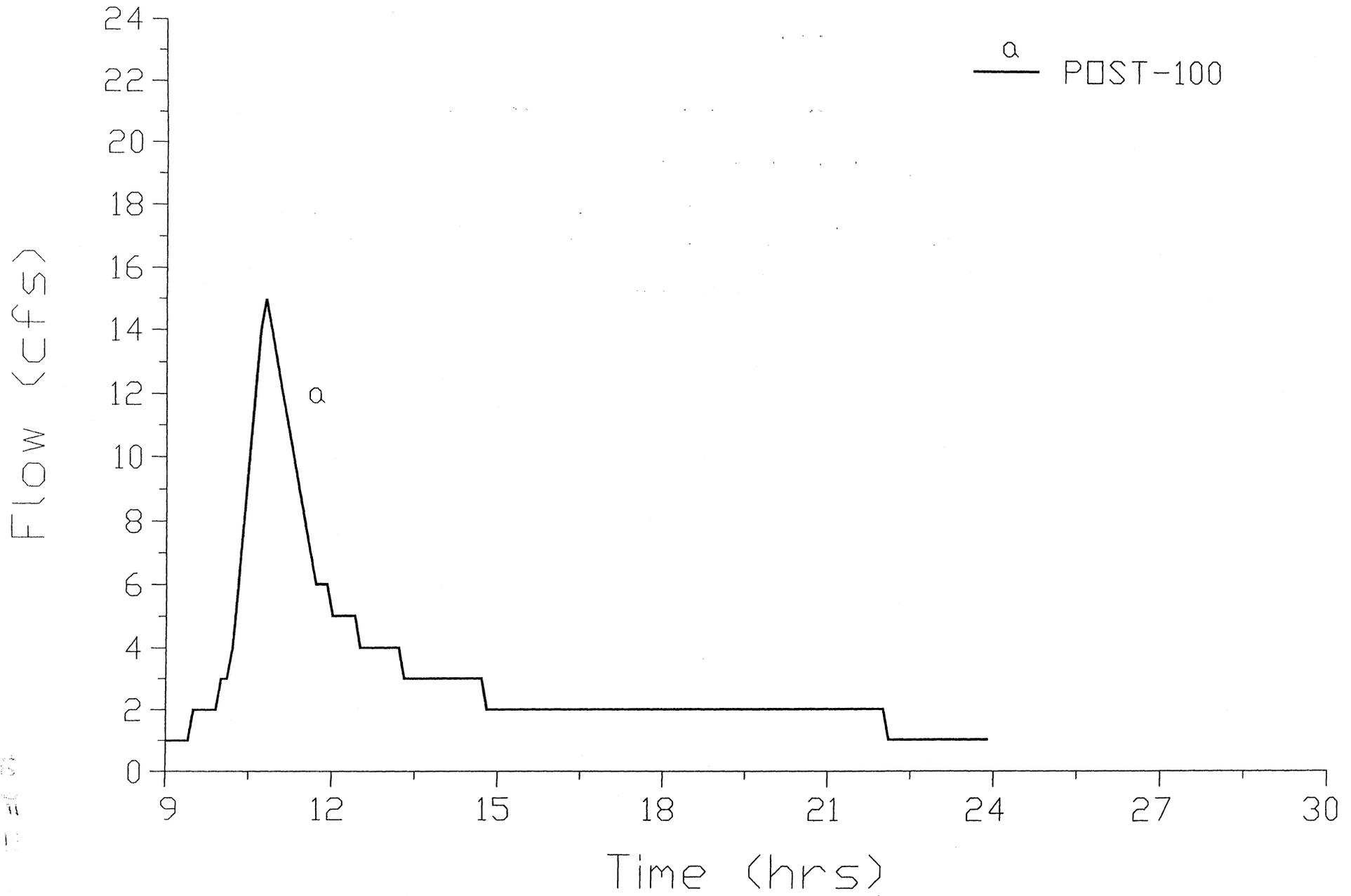
DETENTION STORAGE ESTIMATE
Estimated from Max Allowable Outflow
(Outflow Hydrograph Approximation)

Peak Inflow = 15.00 cfs
Max Outflow = .00 cfs

Estimate Type	Est.Storage ac-ft	From hrs	To hrs
Lower Boundary	3.868	9.0000	23.9000
Linear	3.868	9.0000	23.9000
Curvilinear	3.868	9.0000	23.9000
Upper Boundary	3.868	9.0000	23.9000
Total Inflow	3.868	9.0000	23.9000

Stretch Factor = .000 % (Curvilinear Estimate Only)

Hydrograph POST-100



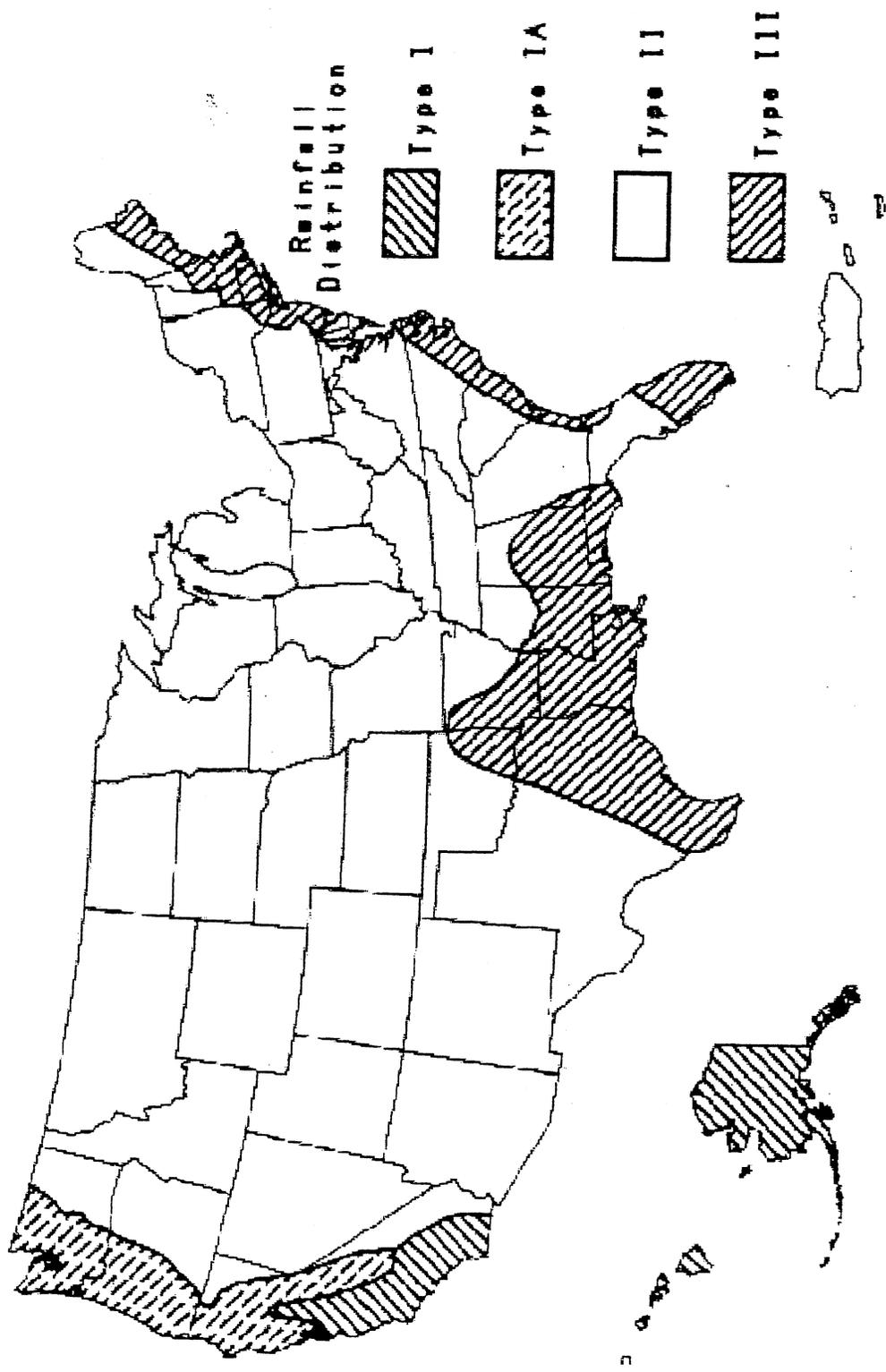
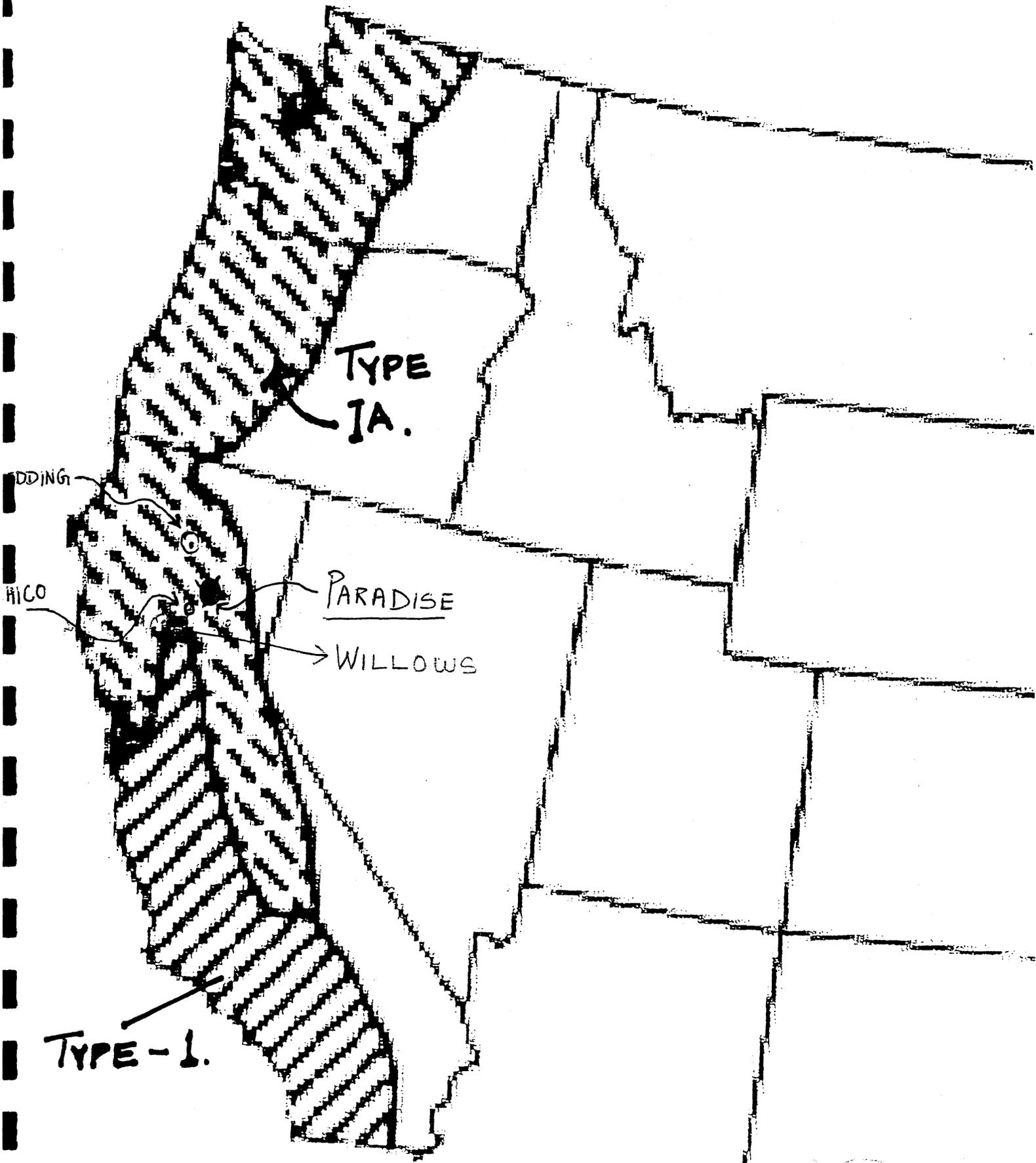
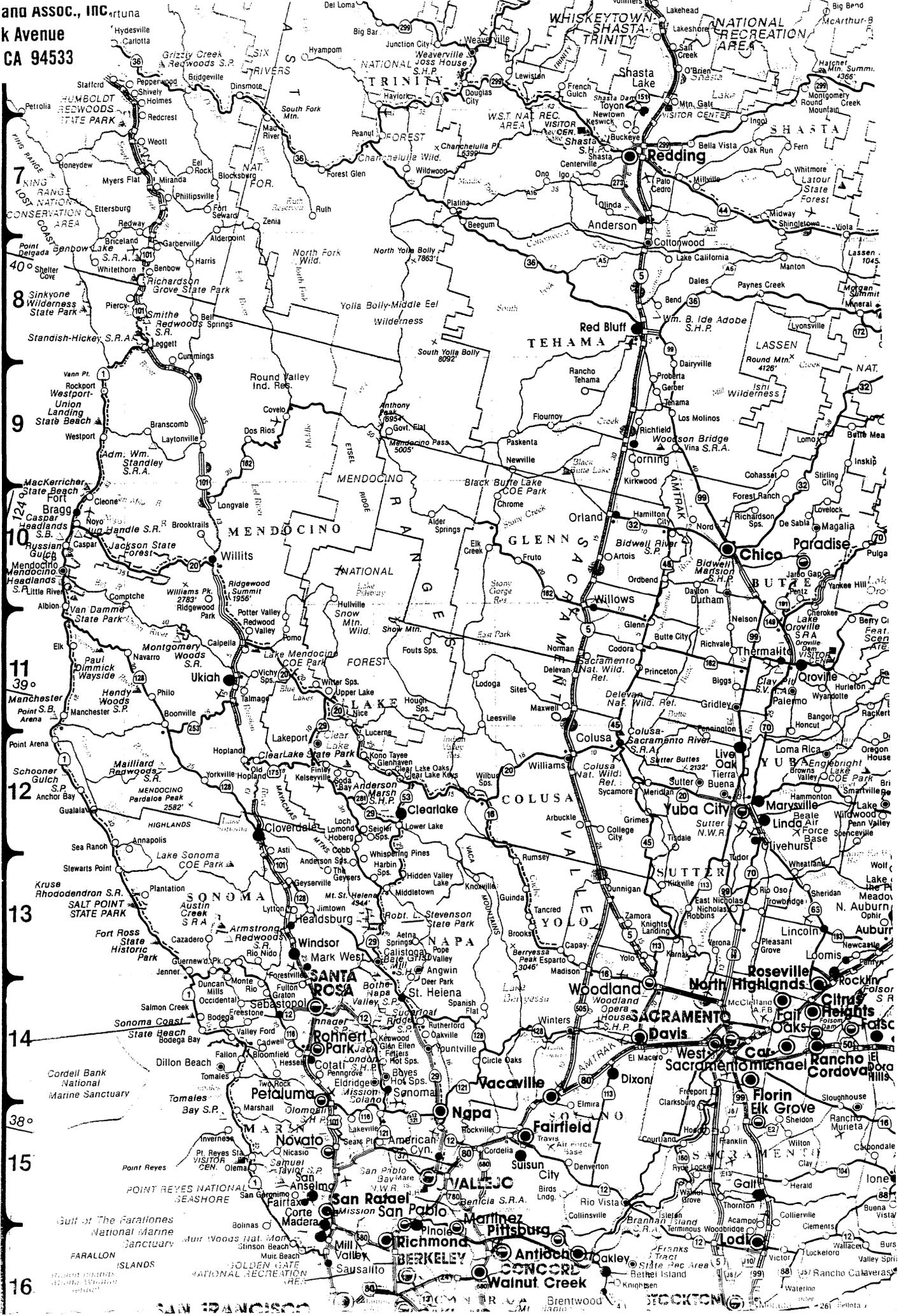


Figure B-2.—Approximate geographic boundaries for RCSI rainfall distributions.



707 Beck Avenue
Fairfield, CA 94533



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7 KING RANGE NATIONAL CONSERVATION AREA
8 Sinkyone Wilderness State Park
9 Westport-Union Landing State Beach
10 MacKerricher State Beach
11 Paul Dimmick Wayside
12 Schooner Gulch S.P.
13 Fort Ross State Historic Park
14 Sonoma Coast State Beach
15 Point Reyes National Seashore
16 GULF OF THE FATHOMES NATIONAL MARINE SANCTUARY

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N. WILLOWS COUNTY
 SERVICE AREA
 RETENTION BASIN SIZING

1-25-88
 D.J.H.

HYDROLOGIC SOIL GROUP D (CLAY)

I. RETENTION AREA WEST OF FREEWAY

CN CALCULATION - ASSUME PRESENT CONDITIONS OF USE, ONLY MINOR AMOUNTS OF IMPERVIOUS SURFACING

TABLE 2-2 CULTIVATED LAND WITH SOME CONSERVATION TREATMENT & ROAD 48

USE CN = 82

RUNOFF CALCULATIONS

100 YEAR, 600 AC., CN = 82

RAIN (IN.)	RUNOFF (IN.)	RUNOFF (AC.-FT.)
1.0	0.12	6
2.0	0.65	33
3.0	1.36	68
4.0	2.2	110
5.0	3.1	155
6.0	4.0	200
7.0	4.9	245
8.0	5.9	295

II AREA BETWEEN FREEWAY & GLENNWOOD PLANT

224 TOTAL ACRES ; 50 ACRES URBAN, 194 ACRES RURAL (PRESENT CONDITION)

CN CALCULATION - TABLE 2-2

		CN	Acres	
ROADS	3%	95	7.3	2.9
1/4 ACRE	20%	87	33.3	17.4
1 ACRE	35%	84	57.4	29.4
OPEN	42%	82	102.5	34.4
				<u>34.1</u>

USE CN = 84

RUNOFF CALCULATIONS

100 YEAR, 224 AC., CN = 84

RAIN (IN.)	RUNOFF (IN.)	RUNOFF (AC.-FT.)
1.0	0.15	3.3
2.0	0.75	14
3.0	1.52	28
4.0	2.35	44
5.0	3.17	60
6.0	4.00	76
7.0	4.80	92
8.0	5.60	108

30 SHEETS 3 SQUARE
 100 SHEETS 100 SQUARE
 200 SHEETS 200 SQUARE
 NATIONAL

PRECIPITATION DEPTH-DURATION-FREQUENCY TABLE

STATION NO. 85N ORDER SUB 480 9606 8		STATION NAME WHEATLAND CALPAK	ELEV	SEC	TWP	RNG	LOT	BNM	LATITUDE	LONGITUDE	COUNTY CODE		
			150	77	08	13N	05E	L	M	38.996	121.442	81	
MAXIMUM PRECIPITATION FOR INDICATED DURATION D-DAYS H-HOURS													
RETURN PERIOD IN YEARS	1D	2D	3D	4D	5D	6D	8D	10D	15D	20D	30D	60D	365D
2	2.28	3.01	3.41	3.74	3.97	4.41	4.79	5.15	5.83	6.31	7.02	10.93	19.84
5	3.07	4.14	4.69	5.11	5.39	5.96	6.48	6.94	7.80	8.52	10.28	14.84	25.67
10	3.57	4.89	5.52	6.00	6.30	6.94	7.53	8.04	8.96	9.86	11.88	17.18	28.94
20	4.04	5.60	6.30	6.82	7.15	7.84	8.49	9.02	9.99	11.08	13.30	19.27	31.82
25	4.18	5.82	6.54	7.07	7.41	8.12	8.79	9.32	10.30	11.48	13.74	19.91	32.67
40	4.25	6.28	7.04	7.29	7.54	8.29	8.99	9.54	10.94	12.21	14.62	21.21	34.39
50	4.62	6.80	7.28	7.64	8.21	8.95	9.67	10.23	11.23	12.57	15.03	21.81	35.18
100	5.05	7.16	8.00	8.58	8.90	9.76	10.52	11.09	12.10	13.63	16.20	23.60	37.80
200	5.46	7.81	8.70	9.31	9.73	10.84	11.34	11.92	12.92	14.65	17.43	25.32	39.70
1000	6.39	9.27	10.28	10.94	11.41	12.29	13.16	13.75	14.73	16.90	20.81	29.11	44.42
10000	7.67	11.32	12.47	13.18	13.73	14.69	15.63	16.21	17.13	19.94	23.46	34.16	50.84
PMP	15.14	21.45	24.23	26.25	27.24	29.84	32.72	34.87	38.98	42.93	52.03	76.08	118.96
MEAN	2.434	3.267	3.682	4.087	4.246	4.688	5.064	5.418	6.048	6.430	7.962	11.433	20.301
CLOCK MR. COR.	1.140	1.070	1.040	1.020	1.010	1.010	1.000	1.000	1.000	1.000	1.000	1.000	1.000
CALCULATED SKEW	1.390	2.249	2.354	2.290	2.077	1.828	1.483	1.305	1.025	0.882	1.504	1.470	0.935
REGIONAL SKEW	1.100	1.300	1.200	1.100	1.100	1.000	0.900	0.800	0.600	0.600	0.700	0.700	0.400
SKEW USED	1.100	1.300	1.200	1.100	1.100	1.000	0.900	0.800	0.600	0.600	0.700	0.700	0.400
KURTOSIS	5.136	9.368	11.782	10.163	6.399	6.393	5.573	4.988	3.683	3.471	4.976	5.762	3.138
N	26	26	26	26	26	26	26	26	26	26	26	26	26
RECORD YEAR	1963	1963	1963	1963	1963	1963	1956	1956	1956	1956	1956	1956	1956
RECORD MAXIMUM	4.650	8.810	10.880	10.830	10.630	10.630	10.800	11.490	11.470	12.000	16.480	23.000	32.560
NORMALIZED MAX	2.324	3.248	3.676	3.612	3.390	2.986	2.742	2.782	2.461	2.539	3.380	3.860	2.207
CALC. COEF. VAR	.392	.494	.504	.458	.444	.425	.417	.389	.357	.319	.324	.332	.274
RECN. COEF. VAR	.348	.371	.372	.370	.361	.358	.364	.363	.363	.365	.369	.377	.324
USED COEF. VAR	.348	.371	.372	.370	.361	.358	.364	.363	.363	.365	.369	.377	.324
MEAN/A	.1199	.1609	.1814	.1974	.2092	.2309	.2495	.2665	.2979	.3266	.3922	.5632	1.0000
RP10/A	.1788	.2409	.2718	.2953	.3104	.3417	.3711	.3958	.4416	.4859	.5851	.8468	1.4266
RP25/A	.2061	.2868	.3222	.3483	.3651	.3998	.4329	.4593	.5076	.5642	.6768	.9807	1.6092
RP50/A	.2277	.3202	.3586	.3862	.4043	.4411	.4764	.5038	.5530	.6190	.7464	1.0741	1.7327
RP100/A	.2487	.3527	.3939	.4228	.4422	.4808	.5181	.5462	.5958	.6712	.8008	1.1626	1.8474
RP1000/A	.3149	.4566	.5062	.5387	.5620	.6085	.6481	.6771	.7257	.8325	.9855	1.4337	2.1878
RP10000/A	.3779	.5574	.6140	.6491	.6762	.7234	.7699	.7987	.8437	.9823	1.1554	1.6829	2.4894
PMP/A	.7657	1.0564	1.1934	1.2930	1.3418	1.4710	1.6120	1.7176	1.9200	2.1146	2.5628	3.7478	5.8600

PRECIPITATION DEPTH-DURATION-FREQUENCY TABLE

STATION NO. 85N ORDER SUB 480 9699 8		STATION NAME WILLOWS	ELEV	SEC	TWP	RNG	LOT	BNM	LATITUDE	LONGITUDE	COUNTY CODE		
			185	140	09	19N	03W	M	39.833	122.208	11		
MAXIMUM PRECIPITATION FOR INDICATED DURATION D-DAYS H-HOURS													
RETURN PERIOD IN YEARS	1D	2D	3D	4D	5D	6D	8D	10D	15D	20D	30D	60D	365D
2	2.01	2.82	2.79	2.93	3.16	3.36	3.77	4.08	4.76	5.13	6.31	8.98	16.59
5	2.69	3.47	3.82	4.00	4.30	4.54	5.10	5.50	6.37	6.93	8.51	12.18	21.45
10	3.14	4.10	4.50	4.70	5.02	5.29	5.93	6.36	7.32	8.02	9.83	14.10	24.19
20	3.55	4.69	5.14	5.34	5.70	5.98	6.68	7.14	8.16	9.01	11.01	15.82	26.58
25	3.68	4.88	5.34	5.54	5.91	6.19	6.91	7.38	8.42	9.32	11.37	16.35	27.29
40	3.74	5.24	5.78	5.83	6.01	6.62	7.39	7.87	8.93	9.94	12.10	17.41	28.73
50	4.08	5.44	5.94	6.14	6.54	6.83	7.61	8.10	9.17	10.22	12.44	17.98	29.33
100	4.44	6.00	6.52	6.72	7.14	7.44	8.27	8.78	9.88	11.09	13.48	19.38	31.33
200	4.86	6.54	7.09	7.29	7.75	8.04	8.92	9.43	10.55	11.91	14.42	20.79	33.16
1000	5.62	7.77	8.38	8.56	9.09	9.37	10.35	10.88	12.03	13.75	16.55	23.90	37.10
10000	6.74	9.48	10.17	10.32	10.94	11.20	12.29	12.84	13.99	15.22	19.41	28.05	42.22
PMP	13.36	17.97	19.76	20.56	21.71	22.77	25.74	27.60	31.83	34.92	43.05	62.47	99.38
MEAN	2.139	2.737	3.003	3.138	3.384	3.574	3.984	4.283	4.939	5.394	6.588	9.387	16.968
CLOCK MR. COR.	1.140	1.070	1.040	1.020	1.010	1.010	1.000	1.000	1.000	1.000	1.000	1.000	1.000
CALCULATED SKEW	.714	.812	.849	.891	.916	.932	.972	.984	1.04	1.077	1.080	.939	1.027
REGIONAL SKEW	1.100	1.300	1.200	1.100	1.100	1.000	0.900	0.800	0.600	0.600	0.700	0.700	0.400
SKEW USED	1.100	1.300	1.200	1.100	1.100	1.000	0.900	0.800	0.600	0.600	0.700	0.700	0.400
KURTOSIS	3.104	4.400	3.499	3.734	3.417	3.176	3.499	3.423	2.715	2.733	4.020	4.799	5.225
N	73	73	73	73	73	73	73	73	73	73	73	73	73
RECORD YEAR	1925	1934	1934	1934	1934	1934	1924	1941	1941	1941	1941	1941	1941
RECORD MAXIMUM	3.800	5.460	5.610	6.250	6.270	6.270	7.770	8.170	9.150	10.010	14.010	23.370	40.400
NORMALIZED MAX	2.224	2.864	2.699	3.097	2.694	2.410	2.831	2.747	2.550	2.438	3.132	3.783	3.886
CALC. COEF. VAR	.349	.348	.322	.320	.314	.312	.330	.330	.334	.351	.388	.397	.363
RECN. COEF. VAR	.348	.371	.372	.370	.361	.358	.364	.363	.363	.365	.369	.377	.324
USED COEF. VAR	.348	.371	.372	.370	.361	.358	.364	.363	.363	.365	.369	.377	.324
MEAN/A	.1261	.1614	.1771	.1888	.1994	.2188	.2349	.2525	.2912	.3180	.3884	.5535	1.0000
RP10/A	.1859	.2418	.2684	.2768	.2962	.3119	.3494	.3750	.4317	.4732	.5795	.8317	1.4266
RP25/A	.2168	.2876	.3146	.3265	.3484	.3649	.4075	.4352	.4962	.5494	.6703	.9439	1.6092
RP50/A	.2394	.3210	.3501	.3620	.3850	.4026	.4485	.4774	.5406	.6029	.7334	1.0857	1.7327
RP100/A	.2616	.3536	.3846	.3964	.4219	.4388	.4878	.5175	.5825	.6530	.7931	1.1427	1.8474
RP1000/A	.3312	.4580	.4943	.5058	.5362	.5526	.6101	.6416	.7094	.8187	.9761	1.4091	2.1878
RP10000/A	.3974	.5588	.5995	.6085	.6451	.6602	.7248	.7568	.8248	.9566	1.1444	1.6840	2.4894
PMP/A	.7845	1.0593	1.1652	1.2120	1.2802	1.3425	1.5175	1.6275	1.8769	2.0593	2.5384	3.6436	5.8600

PEARSON TYPE III DISTRIBUTION USED
PROBABLE MAXIMUM PRECIPITATION ESTIMATE BASED ON 15 STANDARD DEVIATIONS
WHERE N IS SMALL RESULTS ARE NOT DEPENDABLE

707 Beck Avenue
Fairfield, CA 94533

UP
11

STATION NAME
BLACK BUTTE DAM

MAXIMUM ANNUAL PRECIPITATION (UNITS: IN) (FS)
(TO CONVERT TO MILLIMETERS MULTIPLY BY 25.4)
ELEV SEC TWP RANG LOT RRM LATITUDE LONGITUDE COUNTY
475 32 23N 04W H H 39.808 122.329 TFMAMA

M=MINUTES, H=HOURS, D=DAYS, C=YEAR-CALENDAR YEAR, W=YEAR-WATER YEAR, F=YEAR-FISCAL YEAR
***** = NO DATA AVAILABLE

YEAR	DURATION										
	5M	10M	15M	30M	1H	2H	3H	6H	12H	24H	F-YR
1962	*****	*****	0.26	0.38	0.54	0.77	0.94	1.08	2.32	2.64	17.61
1963	*****	*****	0.37	0.40	0.43	0.49	0.55	0.87	1.16	1.99	17.11
1964	*****	*****	0.19	0.34	0.40	0.67	0.87	1.10	1.38	1.47	8.85
1965	*****	*****	0.25	0.35	0.47	0.61	0.63	0.98	1.22	1.70	18.17
1966	*****	*****	0.22	0.31	0.40	0.47	0.57	1.04	1.61	2.19	14.43
1967	*****	*****	0.38	0.57	0.64	1.10	1.32	1.63	2.08	2.14	70.61
1968	*****	*****	0.18	0.24	0.34	0.47	0.79	0.89	1.13	1.62	14.44
1969	*****	*****	0.17	0.25	0.34	0.49	0.57	0.91	1.11	1.40	24.75
1970	*****	*****	0.13	0.16	0.30	0.48	0.56	0.90	1.55	2.08	18.47
1971	*****	*****	0.17	0.24	0.44	0.71	0.74	1.16	1.91	2.55	15.64
1972	*****	*****	0.10	0.14	0.24	0.36	0.45	0.63	0.98	1.77	7.65
1973	*****	*****	0.21	0.27	0.36	0.67	0.79	1.41	1.90	2.49	78.87
1974	*****	*****	0.28	0.45	0.55	0.65	0.70	0.96	1.35	2.08	17.87

PRECIPITATION DEPTH-DURATION-FREQUENCY TABLE

STATION NO. BSN ORDER SUP 430 840 11
STATION NAME BLACK BUTTE DAM
ELEV SEC TWP RANG LOT RRM LATITUDE LONGITUDE COUNTY
475 32 23N 04W H H 39.808 122.329 TFMAMA

RETURN PERIOD IN YEARS	MAXIMUM PRECIPITATION (IN) FOR INDICATED DURATION D=DAYS H=HOURS M=MINUTES										
	5M	10M	15M	30M	1H	2H	3H	6H	12H	24H	F-YR
2	0.0	0.0	0.21	0.29	0.40	0.58	0.68	1.01	1.41	1.82	16.89
5	0.0	0.0	0.29	0.41	0.54	0.81	0.95	1.42	1.97	2.54	21.95
10	0.0	0.0	0.24	0.49	0.66	0.96	1.17	1.68	2.33	3.03	24.82
20	0.0	0.0	0.30	0.56	0.76	1.10	1.29	1.97	2.67	3.46	27.30
25	0.0	0.0	0.41	0.58	0.79	1.15	1.34	2.00	2.78	3.67	28.05
40	0.0	0.0	0.42	0.59	0.80	1.17	1.36	2.03	2.83	3.67	29.55
50	0.0	0.0	0.44	0.64	0.88	1.28	1.49	2.22	3.09	4.01	30.23
100	0.0	0.0	0.50	0.71	0.98	1.41	1.64	2.44	3.40	4.41	32.26
200	0.0	0.0	0.44	0.77	1.05	1.53	1.78	2.66	3.70	4.79	34.17
1000	0.0	0.0	0.65	0.91	1.24	1.81	2.10	3.14	4.37	5.64	38.28
10000	0.0	0.0	0.78	1.10	1.50	2.19	2.54	3.80	5.29	6.86	43.42
PMP	0.0	0.0	1.58	2.22	3.02	4.41	5.14	7.67	10.68	13.84	103.26
MEAN	0.0	0.0	0.224	0.315	0.429	0.626	0.729	1.089	1.515	1.964	17.267
CLOCK HR. COEF.	1.000	1.000	1.000	1.000	1.000	1.000	1.000	1.000	1.000	1.000	1.000
CALCULATED SKFW	0.0	0.0	0.673	0.154	0.183	1.338	1.484	0.687	0.689	-0.121	0.262
REGIONAL SKFW	1.100	1.100	1.100	1.100	1.100	1.100	1.100	1.100	1.100	1.100	0.400
SKFW USED	1.100	1.100	1.100	1.100	1.100	1.100	1.100	1.100	1.100	1.100	0.400
SLOPE OF LOG INTENSITY / LOG TIME = -0.519 ; INTERCEPT (TIME=1 HOUR) = 0.437 ; COEFFICIENT OF DETERMINATION = 0.999 1HR INTERCEPT / MEAN YR = 0.02529 ; AVERAGE CALC CV / USED CV = 0.79											
KURTOSIS	0.0	0.0	3.442	3.361	3.338	4.677	4.385	3.770	2.913	2.636	4.330
N	0	0	12	13	13	13	13	13	13	13	13
RECORD YEAR	0	0	1967	1967	1967	1967	1967	1967	1967	1967	1973
RECORD MAXIMUM	0.0	0.0	0.390	0.520	0.640	1.100	1.320	1.680	2.320	2.650	28.870
NORMALIZED MAX	0.0	0.0	1.065	1.874	1.890	2.603	2.597	1.911	1.996	1.487	2.044
CALC. COEF. VAR	0.0	0.0	0.374	0.346	0.260	0.291	0.312	0.284	0.279	0.235	0.329
REGN. COEF. VAR	0.403	0.403	0.403	0.403	0.403	0.403	0.403	0.403	0.403	0.403	0.332
USED COEF. VAR	0.403	0.403	0.403	0.403	0.403	0.403	0.403	0.403	0.403	0.403	0.332
MEAN/A	0.0	0.0	0.0130	0.0183	0.0249	0.0363	0.0422	0.0631	0.0878	0.1137	1.0000
RP10/A	0.0	0.0	0.0200	0.0281	0.0383	0.0559	0.0651	0.0972	0.1352	0.1752	1.4371
RP25/A	0.0	0.0	0.0238	0.0335	0.0454	0.0665	0.0774	0.1156	0.1608	0.2084	1.6243
RP50/A	0.0	0.0	0.0265	0.0373	0.0508	0.0740	0.0862	0.1288	0.1792	0.2322	1.7508
RP100/A	0.0	0.0	0.0291	0.0410	0.0558	0.0814	0.0948	0.1415	0.1969	0.2552	1.8683
RP1000/A	0.0	0.0	0.0374	0.0527	0.0717	0.1044	0.1218	0.1819	0.2531	0.3279	2.2171
RP10000/A	0.0	0.0	0.0453	0.0638	0.0868	0.1266	0.1475	0.2203	0.3065	0.3972	2.5267
PMP/A	0.0	0.0	0.0913	0.1287	0.1751	0.2555	0.2975	0.4444	0.6183	0.8013	5.9880

PEARSON TYPE III DISTRIBUTION USED
PROBABLY MAXIMUM PRECIPITATION ESTIMATE BASED ON 15 STANDARD DEVIATIONS
WHERE N IS SMALL (<25) RESULTS ARE NOT DEFENDABLE

Hydrologic Soil Groups

Soils are classified by the Natural Resource Conservation Service into four Hydrologic Soil Groups based on the soil's runoff potential. The four Hydrologic Soil Groups are A, B, C and D. Where A's generally have the smallest runoff potential and the greatest.

Details of this classification can be found in 'Urban Hydrology for Small Watersheds' published by the Engineering Division of the Natural Resource Conservation Service, United States Department of Agriculture, Technical Release-55.

Group A is sand, loamy sand or sandy loam types of soils. It has low runoff potential and high infiltration rates even when thoroughly wetted. They consist chiefly of deep, well to excessively drained sands or gravels and have a high rate of water transmission.

Group B is silt loam or loam. It has a moderate infiltration rate when thoroughly wetted and consists chiefly or moderately deep to deep, moderately well to well drained soils with moderately fine to moderately coarse textures.

Group C soils are sandy clay loam. They have low infiltration rates when thoroughly wetted and consist chiefly of soils with a layer that impedes downward movement of water and soils with moderately fine to fine structure.

Group D soils are clay loam, silty clay loam, sandy clay, silty clay or clay. This HSG has the highest runoff potential. They have very low infiltration rates when thoroughly wetted and consist chiefly of clay soils with a high swelling potential, soils with a permanent high water table, soils with a claypan or clay layer at or near the surface and shallow soils over nearly impervious material.

Chapter 2

Estimating Runoff

SCS runoff curve number method

The SCS Runoff Curve Number (CN) method is described in detail in NEH-4 (SCS 1985). The SCS runoff equation is

$$Q = \frac{(P - I_a)^2}{(P - I_a) + S} \quad [\text{eq. 2-1}]$$

where

- Q = runoff (in)
- P = rainfall (in)
- S = potential maximum retention after runoff begins (in) and
- I_a = initial abstraction (in)

Initial abstraction (I_a) is all losses before runoff begins. It includes water retained in surface depressions, water intercepted by vegetation, evaporation, and infiltration. I_a is highly variable but generally is correlated with soil and cover parameters. Through studies of many small agricultural watersheds, I_a was found to be approximated by the following empirical equation:

$$I_a = 0.2S \quad [\text{eq. 2-2}]$$

By removing I_a as an independent parameter, this approximation allows use of a combination of S and P to produce a unique runoff amount. Substituting equation 2-2 into equation 2-1 gives:

$$Q = \frac{(P - 0.2S)^2}{(P + 0.8S)} \quad [\text{eq. 2-3}]$$

S is related to the soil and cover conditions of the watershed through the CN. CN has a range of 0 to 100, and S is related to CN by:

$$S = \frac{1000}{CN} - 10 \quad [\text{eq. 2-4}]$$

Figure 2-1 and table 2-1 solve equations 2-3 and 2-4 for a range of CN's and rainfall.

Factors considered in determining runoff curve numbers

The major factors that determine CN are the hydrologic soil group (HSG), cover type, treatment, hydrologic condition, and antecedent runoff condition (ARC). Another factor considered is whether impervious areas outlet directly to the drainage system (connected) or whether the flow spreads over pervious areas before entering the drainage system (unconnected). Figure 2-2 is provided to aid in selecting the appropriate figure or table for determining curve numbers.

CN's in table 2-2 (a to d) represent average antecedent runoff condition for urban, cultivated agricultural, other agricultural, and arid and semiarid rangeland uses. Table 2-2 assumes impervious areas are directly connected. The following sections explain how to determine CN's and how to modify them for urban conditions.

Hydrologic soil groups

Infiltration rates of soils vary widely and are affected by subsurface permeability as well as surface intake rates. Soils are classified into four HSG's (A, B, C, and D) according to their minimum infiltration rate, which is obtained for bare soil after prolonged wetting. Appendix A defines the four groups and provides a list of most of the soils in the United States and their group classification. The soils in the area of interest may be identified from a soil survey report, which can be obtained from local SCS offices or soil and water conservation district offices.

Most urban areas are only partially covered by impervious surfaces: the soil remains an important factor in runoff estimates. Urbanization has a greater effect on runoff in watersheds with soils having high infiltration rates (sands and gravels) than in watersheds predominantly of silts and clays, which generally have low infiltration rates.

Any disturbance of a soil profile can significantly change its infiltration characteristics. With urbanization, native soil profiles may be mixed or removed or fill material from other areas may be introduced. Therefore, a method based on soil texture is given in appendix A for determining the HSG classification for disturbed soils.

Table 2-2a Runoff curve numbers for urban areas ^{1/}

Cover description	Average percent impervious area ^{2/}	Curve numbers for hydrologic soil group			
		A	B	C	D
<i>Fully developed urban areas (vegetation established)</i>					
Open space (lawns, parks, golf courses, cemeteries, etc.) ^{3/} :					
Poor condition (grass cover < 50%)		68	79	86	89
Fair condition (grass cover 50% to 75%)		49	69	79	84
Good condition (grass cover > 75%)		39	61	74	80
Impervious areas:					
Paved parking lots, roofs, driveways, etc. (excluding right-of-way)		98	98	98	98
Streets and roads:					
Paved; curbs and storm sewers (excluding right-of-way)		98	98	98	98
Paved; open ditches (including right-of-way)		83	89	92	93
Gravel (including right-of-way)		76	85	89	91
Dirt (including right-of-way)		72	82	87	89
Western desert urban areas:					
Natural desert landscaping (pervious areas only) ^{4/}		63	77	85	88
Artificial desert landscaping (impervious weed barrier, desert shrub with 1- to 2-inch sand or gravel mulch and basin borders)		96	96	96	96
Urban districts:					
Commercial and business	85	89	92	94	95
Industrial	72	81	88	91	93
Residential districts by average lot size:					
1/8 acre or less (town houses)	65	77	85	90	92
1/4 acre	38	61	75	83	87
1/3 acre	30	57	72	81	86
1/2 acre	25	54	70	80	85
1 acre	20	51	68	79	84
2 acres	12	46	65	77	82
<i>Developing urban areas</i>					
Newly graded areas					
(pervious areas only, no vegetation) ^{5/}		77	86	91	94
Idle lands (CN's are determined using cover types similar to those in table 2-2c).					

^{1/} Average runoff condition, and $I_n = 0.2S$.^{2/} The average percent impervious area shown was used to develop the composite CN's. Other assumptions are as follows: impervious areas are directly connected to the drainage system, impervious areas have a CN of 98, and pervious areas are considered equivalent to open space in good hydrologic condition. CN's for other combinations of conditions may be computed using figure 2-3 or 2-4.^{3/} CN's shown are equivalent to those of pasture. Composite CN's may be computed for other combinations of open space cover type.^{4/} Composite CN's for natural desert landscaping should be computed using figures 2-3 or 2-4 based on the impervious area percentage (CN = 98) and the pervious area CN. The pervious area CN's are assumed equivalent to desert shrub in poor hydrologic condition.^{5/} Composite CN's to use for the design of temporary measures during grading and construction should be computed using figure 2-3 or 2-4 based on the degree of development (impervious area percentage) and the CN's for the newly graded pervious areas.