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## 5. Other CEQA Requirements

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In accordance with Section 15126 of the State CEQA Guidelines, all aspects of a project should be considered when evaluating its impacts on the environment, including planning, acquisition, development, and operation. As part of the analyses, this chapter of the DEIR identifies the following three components that are referred to collectively as other CEQA considerations:

- growth-inducing impacts of the proposed project (Section 5.1),
- significant irreversible environmental changes if the proposed project is implemented (Section 5.2), and
- effects found not to be significant (Section 5.3).

### 5.1 Growth-Inducing Impacts

Section 15126.2(d) of the State CEQA Guidelines requires that an EIR describe potential ways in which the proposed project could foster economic or population growth, either directly through the construction of additional housing or indirectly by removing obstacles to growth through improvements to infrastructure or economic stimulation. CEQA emphasizes that growth in an area should not be considered as beneficial, detrimental, or of little significance.

#### 5.1.1 Population Growth

The proposed project is a commercial use that does not include housing units. Therefore, the project would not directly increase population in the project area and is not likely to generate indirect growth by encouraging individuals outside of Loomis to migrate in search of employment opportunities. Project operation would generate 170 full-time positions, while Placer County's existing labor force is approximately 186,900 persons, according to the California Employment Development Department (EDD 2019). Placer County's unemployment rate stood at 2.8 percent in October 2019 based on data from the California Employment Development Department (EDD 2019). Using this information, the available labor force in the County is estimated to be 4,900 persons, enough to meet the demand for full-time positions to operate the project without in-migration of people from outside the region. Project operation would not result in any indirect growth impacts.

#### 5.1.2 Removal of Obstacles to Growth

Growth in an area may result from the removal of physical impediments or restrictions to growth. In this context, physical growth impediments may include nonexistent or inadequate access to an area or the lack of essential public services such as water or sewer service. The following analysis discusses each of these impediments and evaluates the effects of the proposed project relative to the criterion.

##### 5.1.2.1 Roads

An existing roadway network serves the project site and provides good regional access to I-80. The proposed project does not require construction of new roads that would provide access to an area previously inaccessible to motor vehicles. However, due to concerns regarding traffic, alternative site access plans have been developed (Project Driveway Access Options 1B and 1C) and include the extension of the existing Granite Road south of the project.

##### 5.1.2.2 Utilities

All required municipal services are available to the project site from backbone systems located in the surrounding road rights-of-way. On-site utility systems would be sized and constructed to meet the demand of the proposed project only and would not extend to vacant land that could promote growth of vacant parcels. Existing utility service providers can accommodate demand for service that would be created by operation of the proposed project, as discussed below in Section 5.3, "Effects Found Not to Be Significant."

### 5.1.3 Economic Growth

The project site is designated for commercial use by the *Town of Loomis General Plan* (General Plan), and project operation would increase economic activity relative to existing conditions, consistent with the General Plan's land use goals to increase economic activity through sales of goods and services. Specifically, increased economic activity is consistent with Goal 9 of the General Plan's Land Use Element, which states:

9. To improve the Town's commercial base to increase municipal revenues and provide a wider range of goods and services for local residents, in addition to encouraging some commercial uses near the freeway and in the downtown that can attract or serve patrons from outside the community.

## 5.2 Significant Irreversible Environmental Changes

Section 15126.2(c) of the State CEQA Guidelines requires a discussion of any significant irreversible environmental changes that would be caused by the proposed project. Generally, a project would result in significant irreversible environmental changes if:

- the primary and secondary impacts would generally commit future generations to similar uses;
- the project would involve a large commitment of nonrenewable resources;
- the project would involve uses in which irreversible damage would result from any potential environmental accidents associated with the project; or
- the proposed consumption of resources is not justified (i.e., the project would involve the wasteful use of energy).

The proposed project would commit the site to a developed use because it is economically infeasible to restore the site to its pre-development open space conditions after the project has been implemented.

The types and level of development associated with the proposed project would consume limited, slowly renewable, and nonrenewable resources. This consumption would occur during construction of the proposed project and would continue throughout its operational lifetime. Development of the proposed project would require a commitment of resources that would include building materials, fuel and operational materials/resources, and the transportation of goods and people to and from the project site.

The commitment of resources required for the type and level of proposed development would limit the availability of these resources for future generations for other uses. However, this resource consumption would be consistent with growth and anticipated change in Loomis and the Placer County region. The proposed project includes a variety of best management practices (BMPs) that would avoid wasteful use of energy and encourage recycling and reuse of materials. As identified in Section 2.3.3.4 of this EIR, the proposed project would incorporate the following operational energy conservation practices and features used by Costco into the building and parking field design:

- Using light-emitting diode (LED) lamps provides a higher level of perceived brightness with less energy than other lamps such as the high-pressure sodium type.
- Use of pre-manufactured building components, including structural framing and metal panels, helps to minimize waste during construction.
- Pre-manufactured metal wall panels with insulation carry a higher energy efficiency rating (R-Value) and greater solar reflectivity to help conserve energy consumed to heat and cool the structure.
- Costco uses a reflective "cool roof" material to produce lower heat absorption, thereby lowering energy requirements during the summer when the heating, ventilation, and air conditioning (HVAC) system is running hard.
- HVAC comfort systems are controlled by a computerized building management system to maximize efficiency.
- HVAC units are high-efficiency directed duct units.
- Parking lot lights are controlled by the project's energy management system.

With application of these operational features, construction and operation of the proposed project would not represent a wasteful consumption of resources.

## 5.3 Effects Found Not to Be Significant

Section 15060(d) of the State CEQA Guidelines allows a lead agency to begin the EIR process immediately after deeming an application complete and determining that a project is subject to CEQA if the project would clearly require an EIR. Consistent with this guidance, the Town elected to skip preparation of an initial study for the proposed project and begin work directly on the EIR by releasing a notice of preparation (NOP). In the absence of an initial study, the Town provides the reasons described below for determining which effects would be scoped out from further review in the DEIR.

### 5.3.1 Resource Topics with No Impacts

#### 5.3.1.1 Agriculture and Forestry Resources

According to the Placer County Important Farmland map, published by the California Department of Conservation's Division of Land Resource Protection, the project site is designated as Grazing Land, land that is used for residential, industrial, commercial, institutional, and public utility structures and for other developed purposes (DOC 2016a). Appendix G of the State CEQA Guidelines states that conversion of Prime Farmland, Farmland of Statewide Importance, or Unique Farmland to nonagricultural use establishes a significant environmental effect for the conversion of agricultural land. Grazing Land is not considered Important Farmland under CEQA (California Public Resources Code [PRC], Sections 21060.1 and 21095; State CEQA Guidelines, Appendix G).

The project site is not zoned for agricultural use or under a Williamson Act contract (DOC 2016). The site also is not cultivated or adjacent to cultivated farmland. Therefore, the proposed project would not convert Important Farmland or active agricultural land to nonagricultural uses, conflict with zoning for agricultural uses, or conflict with existing Williamson Act contracts. **No impact** on agricultural resources would occur and this issue is not evaluated further in this EIR.

The project site is not zoned as forestland, timberland, or a Timberland Production Zone. Appendix G of the State CEQA Guidelines further defines forestland as land that can support 10% native tree cover and woodland vegetation of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resource (timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation) and other public benefits (PRC Section 12220[g]). The project site contains oak woodland and other trees; however, these trees would not be considered forestland as defined by PRC Section 12220(g) (see Section 3.4, "Biological Resources," for further discussion). **No impact** on forestry resources would occur and this issue is not evaluated further in this EIR.

#### 5.3.1.2 Mineral Resources

Appendix G of the State CEQA Guidelines states that a project would have a significant impact if it would result in the loss of availability of a known mineral resource of value to the state or locally important mineral resource recovery site. No mineral resources are identified in the General Plan as being present on or near the project site. Neither the General Plan nor any other relevant land use plans (the *Placer County General Plan*, Surface Mining and Reclamation Act of 1975 Mineral Land Classification Map) designate any sites for mineral resource recovery. Because no mineral resources are present in Loomis, **no impact** would occur related to the potential loss of availability of a known mineral resource that would be of value to the region/state or a locally important mineral resource. Therefore, this issue is not evaluated further in this EIR.

#### 5.3.1.3 Population and Housing

Appendix G of the State CEQA Guidelines states that a project would have a significant impact if it would induce substantial unplanned population growth in an area or displace substantial number of existing housing. The proposed project does not propose population growth and is not a linear feature that would divide an existing community. No residences are located on the project site; therefore, the proposed project would not result in the displacement of substantial numbers of people or occupied housing units that would necessitate the construction of replacement housing elsewhere.

Sufficient labor force is available in the area to meet the employment opportunities provided by the project. Project operation would require an average daily workforce of approximately 170 full-time employees. The source of the labor force is unknown at this time, but workers likely would come from the local labor pool. As of September 2019, the unemployment rate for Placer County was estimated at 2.6 percent, with the total number of unemployed persons looking for a job estimated at 6,400 (EDD 2019). Using this information, the available labor force of the region is

sufficient to meet the demand for full-time positions to operate the project without in-migration of people that may increase demand for housing units.

As discussed in Section 5.3.1.2, the proposed project would construct parking spaces, onsite circulation and landscaped areas on parcels 045-042-23, 045-042-011, 045-042-012, designated and zoned Residential High Density/R-H and Residential Medium High Density/RM-H, respectively, and parcels 045-042-034 and 045-042-036, which are partially designated and zoned Residential Medium High Density/RM-5, the majority of the remainder of the parcels designated and zoned General Commercial/CG. Parking and landscaping are allowed uses in residential designations/zones. The proposed use of residentially-designated/zoned land would not reduce the potential for residential units, as multi-family residential units are allowed within the CG commercial zone at a density of two to ten units per acre in a mixed use project. Development of the project site would reduce the amount of vacant land available to accommodate future housing needs identified in the Regional Housing Needs Assessment. However, this would not result in the displacement of existing people or housing, and it would not prevent the Town from having adequate inventory of vacant parcels to accommodate the Regional Housing Needs Assessment goals.

Population, housing, and employment growth, in and of itself, is not an environmental impact. However, increased population, employment, and housing can result in indirect impacts. Examples include increased travel demand that requires additional roadways and other transportation infrastructure, with associated air pollutant emissions and traffic noise; and impacts related to expansion of public facilities and utilities as needed to serve new growth. Specific impacts on other resources and issue areas are addressed in each technical section of this EIR as appropriate. These technical sections provide a detailed analysis of other relevant physical environmental effects that could result from the proposed project. In summary, **no impact** would occur related to unplanned population growth or displacement of housing or people, and this issue is not evaluated further in this EIR.

#### 5.3.1.4 Wildfire

Appendix G of the State CEQA Guidelines states that a project would have a significant impact if it was located in or near a high fire hazard severity zone and would; 1) substantially impair an emergency response or evacuation plan, 2) exacerbate wildfire risk by placement of use in a manner that would expose project occupants to pollutant concentrations from uncontrolled wildfire, or 3) require installation of infrastructure that exacerbates fire risk. The CAL FIRE map "Fire Hazard Severity Zones in LRA" for Placer County identifies the project site and surrounding area as a Non-Very High Fire Hazard Severity Zone, which indicates that the risk of wildland fire hazards is not considered high or very high (CAL FIRE 2008). Because the project site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones, **no impact** related to wildfires would occur. This issue is not discussed further in this EIR.

### 5.3.2 Resource Topics with Less-Than-Significant Impacts and Impacts Mitigated to a Level of Less than Significant

#### 5.3.2.1 Cultural Resources, including Tribal Cultural Resources

Appendix G of the State CEQA Guidelines states that a project would have a significant impact if it would cause a substantial adverse change in the significance of either an historic or archeological resource, or disturbs human remains including those interred outside a formal cemetery. A cultural resources inventory was prepared to document on-site resources and determine the potential for project-related impacts.<sup>1</sup> The inventory included an examination of data collected from earlier efforts, contact with the Native American Heritage Commission (NAHC), and an archaeological examination of the project area. See Appendix F for a copy of the cultural resources inventory of the project site.

The Town of Loomis distributed the NOP on May 15, 2017, to tribal organizations that had requested to be informed of CEQA projects under Assembly Bill (AB) 52. AECOM also contacted the NAHC to request a records search of the Sacred Lands file to identify recognized tribes culturally and traditionally affiliated with the project area. The United Auburn Indian Community responded to this consultation request and a representative from the tribe was present during field investigations at the project site. No tribal cultural resources were identified on or adjacent to the project

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<sup>1</sup> Cultural resources are defined as buildings, sites, districts, structures, burials, or objects having historical, architectural, archaeological, or cultural importance.

site during this consultation. Therefore, **no impact** on known tribal cultural resources would occur and this issue is not evaluated further in this EIR.

The literature search and field inventory of the project area identified one historic cultural resource site, consisting of house foundations, a historic road, and a trash scatter, and two isolated ground stone fragments. Neither the house nor the road is associated with important people or events. The foundation and road remnants have no distinctive characteristics of construction, nor do they represent the work of an important or creative individual. There is no evidence of artifacts with potential data value at the location of the house foundation, and the trash scatter does not have large numbers of artifacts or significant artifacts that could yield information important in history. Thus, these resources are not significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California and are not considered historic for purposes of CEQA.

Two isolated groundstones were found in a recently disturbed heavy-equipment track on the property. No evidence of midden soil, bedrock milling features, or other artifacts was noted. Groundstone #1, a possible chopper or mano fragment, measures 11.5 centimeters (cm) long by 11.5 cm wide by 5.5 cm thick. Groundstone #2, which appears to be an unshaped mano, measures 14.6 cm long by 8.1 cm wide by 4.2 cm thick. Because they lack context or association with other evidence of prehistoric cultural activity, these artifacts are not eligible for listing in the California Register of Historic Resources and are not considered a unique archaeological resource as defined in PRC Section 21083.2.

Because no historical or unique archaeological resources are located on the project site, no impact would occur with project construction and operation. However, it is possible for previously undiscovered cultural resources to be exposed during project construction activity. In the absence of proper evaluation and management, the project could disturb previously unknown artifacts, potentially resulting in damage to one or more historical resources or unique archaeological resources. This impact would be potentially significant but would be **less than significant with implementation of Mitigation Measure CUL-1**. Therefore, this issue is not evaluated further in this EIR.

No evidence of prehistoric or early historic interments was found during background research and field surveys; however, this does not preclude the existence of buried subsurface human remains on the project site. Prehistoric archaeological sites, including some that contain human remains, have been identified in other areas of Placer County. The likelihood that currently unknown archaeological resources in the project area could be inadvertently exposed cannot be dismissed. The inadvertent exposure of previously unidentified human remains, including those interred outside of formal cemeteries, during site development would be a potentially significant impact.

California law recognizes the need to protect historic-era and Native American human burials, skeletal remains, and items associated with Native American interments from vandalism and inadvertent destruction. The procedures for the treatment of Native American human remains are contained in Sections 7050.5 and 7052 of the California Health and Safety Code and PRC Section 5097. All development must comply with the Health and Safety Code, which states that if any human remains are uncovered, all construction must stop, and the county coroner must be notified. If the remains are determined to be Native American, California law dictates appropriate follow-up actions. Compliance with the Health and Safety Code would avoid disturbing a previously unknown resource by requiring contractor to cease in order to prevent disturbance and contact the appropriate representatives to ensure the remains are appropriately protected. The project would have a **less than significant** impact assuming compliance with existing regulations.

### **Mitigation Measure CUL-1: Avoid Damage to Subsurface Archaeological Deposits.**

If any prehistoric or historic-era subsurface archaeological features or deposits, including locally darkened soil ("midden") that could conceal cultural deposits, are discovered during construction-related earthmoving activities, all ground-disturbing activity within 100 feet of the resources shall be halted until a professional archaeologist can evaluate the significance of the find in accordance with National Register of Historic Places (NRHP) and CRHR criteria. The Town of Loomis shall be notified.

If a qualified archaeologist determines the find to be significant by the archaeologist (i.e., because the find constitutes either a historical resource or a unique archaeological resource), representatives of the Town will meet with the archaeologist to determine the appropriate course of action, in accordance with applicable State requirements. If necessary, a Treatment Plan will be prepared by an archeologist, outlining recovery of the resource, analysis, and reporting of the find. The Treatment Plan will be submitted to the Town for

review and approval prior to resuming construction. The Treatment Plan could include planning construction to avoid the site, deeding the site into a conservation easement, capping or covering the archeological site with soil before building on the site, or incorporating open space into the site plan to preserve artifacts in place, or collection and recordation of the artifacts. All significant cultural materials recovered shall be subject to scientific analysis and professional museum curation, and a report shall be prepared by the qualified archaeologist according to current professional standards.

If the archaeologist determines that some or all of the affected property qualifies as a Native American cultural place, including a Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine (PRC Section 5097.9) or a Native American historic, cultural, or sacred site that is listed or may be eligible for listing in the California Register of Historical Resources pursuant to PRC Section 5024.1, including any historic or prehistoric ruins, any burial ground, any archaeological or historic site (PRC Section 5097.993), the archaeologist shall recommend and the Town of Loomis will adopt potentially feasible measures that would preserve the integrity of or minimize impacts on the site, including any or a combination of the following:

- avoidance, preservation, and/or enhancement of all or a portion of the Native American cultural place;
- an agreement with any such tribal or cultural resource organization to maintain the confidentiality of the location of the site to minimize the danger of vandalism to the site or other damage to its integrity; or
- other measures, short of full or partial avoidance or preservation, intended to minimize impacts on the Native American cultural place consistent with the proposed design and footprint of the development project for which the requested grading permit has been approved.

### 5.3.2.2 Geology and Soils

#### 5.3.2.2.1 Seismic Ground Shaking

Appendix G of the State CEQA Guidelines states that a project would have a significant impact if it directly or indirectly causes potential for a substantial adverse effect involving rupture of known fault, strong ground shaking, ground failure such as liquefaction, landslides or the loss of top soil from erosion. A preliminary geotechnical study prepared by Kleinfelder (see Appendix G) found that the project site is not located within or near an Alquist-Priolo Earthquake Fault Zone. However, active faults in the broader region could subject Loomis to strong seismic ground shaking. The closest active fault to the project site is the Foothills Fault System, about 8 miles to the east. Of the multiple fault segments in the Foothills Fault System, the Deadman, Maidu, Spenceville, and Rescue faults are closest to the project site (Kleinfelder 2017a). An earthquake within the Foothills Fault System could cause ground movement on the project site, and the potential exists for moderate to severe seismic ground shaking to occur. Thus, development of the proposed project would potentially expose people and property to ground shaking associated with earthquake activity.

The proposed project would be required to follow the seismic standards of the most recent version of the California Building Standards Code, which requires implementation of measures to ensure that structures can withstand the maximum expected ground shaking without catastrophic failure. Measures may include stabilizing the ground, selecting appropriate foundation types and depths, selecting appropriate structural systems to accommodate anticipated displacements, or using any combination of these measures. The code also regulates grading activities; construction on expansive soils, areas subject to liquefaction, and other unstable soils; and excavation of foundations and retaining walls. Further, the California Building Standards Code requires preparation of a preliminary soil report, engineering geologic report, geotechnical report, and supplemental ground-response report.

A geotechnical study prepared for the proposed project recommends foundation and retaining wall designs based on site-specific seismic design parameters in compliance with the California Building Standards Code (Kleinfelder 2017a). With incorporation of the standards from the California Building Standards Code and the recommendations identified in the geotechnical study, the impact of the proposed project related to potential to expose people or structures to adverse effects of strong seismic ground shaking would be **less than significant**, and this issue is not evaluated further in this EIR.

#### 5.3.2.2.2 Soil Erosion

Construction of the proposed project would result in temporary and short-term erosion impacts. The project would involve installing utilities, paving, and erecting the warehouse and fueling station on approximately 18 acres of land. Construction-related vegetation removal, demolition, grading, staging, trenching, and excavation would result in the

temporary and short-term disturbance of soil and would expose disturbed areas to storm events during the initial 2 months of construction. According to the preliminary grading plan (see Figure 2-9 in Chapter 2, “Project Description”), the average cut and fill would range from 1 to 10 feet across most of the site. Excavations for deep utilities and the loading dock may exceed 4 feet and installation of the underground storage tanks for the fueling facility would require excavation up to 20 feet deep. Earthwork would be balanced on-site, with the earth material cut during overexcavation used as fill to establish building pads. Because of the volume of material that would be moved within the project site, the potential exists for soil erosion, which could lead to sedimentation of on-site and nearby waterways, as well as deposition of soil on neighboring properties and public rights-of-way.

Chapter 15.28.23, “Grading Standards, Erosion and Sediment Control,” of the City of Rocklin Municipal Code and Chapter 12.04, “Grading, Erosion, and Sediment Control,” of the Loomis Municipal Code require that an erosion and sediment control plan be prepared before a grading permit is issued for development of the proposed project (City of Rocklin 2006; Town of Loomis 2017a). The grading permit application for the project site must include an erosion and sediment control plan that stipulates implementation of BMPs to control erosion during grading (see “Hydrology and Water Quality,” below). Erosion and sediment control plans must comply with the Town’s stormwater management plan, the California Stormwater Quality Association BMP Handbook, and requirements of other responsible agencies. Therefore, short-term construction-related erosion impacts would be **less than significant** and this issue is not evaluated further in this EIR.

#### 5.3.2.2.3 Unstable Soils

A combination of factors contributes to the potential for seismically induced liquefaction and lateral spreading, such as the intensity of ground shaking, soil type and density, depth to groundwater, and proximity to watercourses. Based on a review of geologic maps and U.S. Natural Resources Conservation Service (NRCS) soil data, it is unlikely that soils on the project site would be subject to liquefaction in the event of an earthquake; on-site soils have a low clay content, and the groundwater table is approximately 50 feet below the ground surface or deeper (Kleinfelder 2017a; NRCS 2017). Therefore, **no impact** would occur related to the potential for liquefaction and lateral spreading, and this issue is not evaluated further in this EIR.

Subsidence related to human activity can result from withdrawal of subsurface fluids, particularly pumping water from subsurface water tables for residential, commercial, and agricultural uses. The project site is not located in an area of known ground subsidence caused by the withdrawal of subsurface fluids (Kleinfelder 2017a). Therefore, **no impact** related to subsidence would occur and this issue is not evaluated further in this EIR.

The project site and surrounding area are relatively flat to gently sloping. Therefore, **no impact** related to landslides would occur and this issue is not evaluated further in this EIR.

Overall, the site is generally considered geologically stable for development, provided that the geotechnical engineering recommendations and design criteria in the geotechnical study are incorporated into design considerations and improvement plans. The geotechnical study incorporates geotechnical design recommendations based on the standards presented in the California Building Standards Code and provides construction recommendations for site preparation, excavations, fill material, compaction, and trench backfilling (Kleinfelder 2017a). Therefore, impacts of the proposed project associated with an unstable geologic unit would be **less than significant** and this issue is not evaluated further in this EIR.

#### 5.3.2.2.4 Expansive Soils

Expansive soils shrink and swell as a result of moisture change. In time, these volume changes can cause damage to building foundations, underground utilities, and other subsurface facilities and infrastructure that are not designed and constructed appropriately to resist damage associated with changing soil conditions. Volume changes of expansive soils also can result in the consolidation of soft clays after lowering of the water table or the placement of fill. Placing buildings or constructing infrastructure on or in unstable soils can result in structural failure.

Soils on the entire project site are composed of Andregg coarse sandy loam, 2% to 9% slopes (NRCS 2017). NRCS data indicate that this soil profile has a low shrink-swell potential, meaning that the soil has a low clay content and is unlikely to undergo substantial volume changes with increases or decreases in soil moisture content. Therefore, **no impact** related to expansive soils would occur and this issue is not evaluated further in this EIR.

#### 5.3.2.2.5 Septic Systems

The proposed project would connect to the South Placer Municipal Utility District (SPMUD) sewer system. Therefore, **no impact** would occur related to soils incapable of adequately supporting the use of septic tanks, and this issue is not evaluated further in the EIR.

#### 5.3.2.2.6 Paleontological Resources

A review of the Geologic Map of the San Francisco–San Jose Quadrangle (Wagner et al. 1991) indicates that the entire project site is underlain by the Upper Jurassic/Lower Cretaceous (approximately 128 million years ago) granitic rock classified as quartz diorite and mapped as the Penryn Pluton. Plutonic rocks are formed by cooling magma before reaching the earth's surface, and the bedrock has no potential to contain fossils. Therefore, **no impact** would occur related to potential damage to unique paleontological resources, and this issue is not evaluated further in the EIR.

### 5.3.2.3 Hazards and Hazardous Materials

Appendix G of the State CEQA Guidelines states that a project would have a significant impact if it would; 1) create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, 2) create a reasonably foreseeable risk of upset or accident conditions, emit hazardous emissions or, 3) be located on the list of hazardous materials sites.

#### 5.3.2.3.1 Routine Transport, Use, or Disposal of Hazardous Materials

Project construction would involve storing and using small amounts of hazardous materials (e.g., asphalt, fuel, lubricants, paint, and other substances) and transporting such materials on roadways such as Sierra College Boulevard, Granite Drive (for Options 1B and 1C), and regional highways such as I-80. Regulations governing hazardous-materials transport are included in California Code of Regulations (CCR) Title 22 and the California Vehicle Code (CCR Title 13), and transportation of hazardous materials on area roadways is regulated by the California Highway Patrol and the California Department of Transportation.

Operation of the proposed project would involve the storage and use of hazardous materials including gasoline, diesel fuel, degreasers, lubricants, and common cleaning agents. As described below, the proposed project would be required to obtain permits and comply with appropriate regulatory agency standards designed to avoid releases of hazardous wastes.

The project applicant and its construction contractor(s) would be required to comply with the California Environmental Protection Agency's Unified Program.<sup>2</sup> Regulated activities would be managed by the Placer County Environmental Health Department (Environmental Health), the designated Certified Unified Program Agency for Placer County, in accordance with the regulations included in the Unified Program (e.g., Hazardous Materials Release Response Plans and Inventories [Business Plans], California Accidental Release Prevention Program, Underground Storage Tank [UST] Program, Aboveground Petroleum Storage Act Program, California Uniform Fire Code, and Hazardous Waste Generator and Onsite Hazardous Waste Treatment Programs). Such compliance would reduce the potential for an accidental release of hazardous materials during construction and operation of the proposed project. Each of these regulations is specifically designed to protect the public health through improved procedures for handling hazardous materials, better technology in the equipment used to transport these materials, and a more coordinated and quicker response to emergencies.

Any business that stores an acutely hazardous substance, or that stores 55 gallons and/or 500 pounds of a hazardous substance or 200 cubic feet of combustible gas, must file an emergency response plan and hazardous materials storage and containment plan with Placer County Environmental Health in compliance with the California Hazardous Materials Release Response Plans and Inventory Law (also known as the Business Plan Act). The plan includes an inventory of hazardous materials handled, facility floor plans showing where hazardous materials are stored, an emergency response plan, and provisions for training employees in safety and emergency response procedures (California Health and Safety Code, Section 25500 et seq.).

The proposed project includes the development of a fueling station, which would store gasoline in underground storage tanks. Leaking USTs can pollute the soil, contaminate groundwater, and pose risks of fire or explosion. The project applicant would obtain a permit for installation of USTs from Placer County Environmental Health. The USTs

<sup>2</sup> The Unified Program consolidates, coordinates, and makes consistent the administrative requirements, permits, inspections, and enforcement activities of six environmental and emergency response programs.



would be designed, installed, and monitored following all applicable regulations set forth by Placer County Environmental Health.

With incorporation of and compliance with existing regulations, impacts related to the creation of significant hazards to the public through routine, transport, use, disposal, of hazardous materials during construction and operation of the proposed project would be **less than significant**. This issue is not evaluated further in the EIR.

#### 5.3.2.3.2 Human Health Hazards from Exposure to Existing Hazardous Materials

Kleinfelder prepared a Phase I environmental site assessment (ESA) and Phase II ESA for the project site (see Appendix H). The Phase I ESA included a review of local, state, and federal environmental record sources, historical sources, and aerial photographs; a summary of site reconnaissance; a summary of interviews conducted with persons knowledgeable about current and past site use; and physical setting sources. The Phase II conducted soil sampling and laboratory testing to determine the nature and extend of on site soil contamination. The following discussion summarizes the findings of the Phase I and II ESA (Kleinfelder 2017b, 2018).

Site reconnaissance was conducted on September 19, 2016, to determine current site conditions and check for the storage, use, production, or disposal of hazardous or potentially hazardous materials. No contaminated municipal groundwater wells, septic systems, active or inactive landfills, productive oil or gas wells, stressed vegetation, discolored or stained soil or concrete, or registered USTs or aboveground storage tanks were observed on the project site. One domestic groundwater well was observed east of Starlight Lane near the eastern boundary of the project site. In addition, piles of wood, wooden pallets, fencing, dirt, brush, and other debris were observed adjacent to the gate in the southeastern portion of the project site. No hazardous materials were observed in the debris pile.

Kleinfelder searched the State Water Resources Control Board's (SWRCB's) GeoTracker Web site and the California Department of Toxic Substances Control's (DTSC's) EnviroStor Web site to identify toxic releases, hazardous waste, or other violations that could affect the project site. No GeoTracker or EnviroStor listings were reported to be associated with the project site. The project site is not listed on a hazardous waste and substances site list (Cortese List) pursuant to Government Code Section 65962.

Kleinfelder identified the following recognized environmental conditions (RECs)<sup>3</sup> in its Phase I ESA:

- The former orchard on the project site and associated structures may have been used for storage of equipment and/or chemicals. Orchards typically use smudge pots that use petroleum hydrocarbons to reduce the potential for freezing. The orchard also may have been routinely treated with pesticides (such as lead arsenate) and other chemicals, which could remain in the project site's soils. According to Placer County Environmental Health, lead and arsenic are commonly found at former orchards in Placer County.
- A gasoline station with USTs has operated since approximately 1999 on the adjacent property south of the project site at 4211 Sierra College Boulevard. The gasoline station property is believed to be hydrogeologically cross-gradient to potentially up-gradient relative to the project site. Although no releases have been reported at the gasoline station, its operation for almost two decades increases the likelihood that undetected spills or leakage have occurred during operations, resulting in impacts on the shallow groundwater.

A rectangular feature was visible in aerial photographs near the south end of Starlight Lane, extending in an east-west direction toward the eastern project site boundary. The use of this feature is unclear and an area of disturbed ground was noted in the general vicinity during the site reconnaissance. The Phase I ESA concluded that this feature is not a REC but warrants further investigation before construction begins.

Kleinfelder prepared a Supplemental Phase II ESA to address potential contamination from RECs identified in its Phase I ESA (Kleinfelder 2017) (Appendix H2). Soil, groundwater, and soil vapor samples were tested for organochloride pesticides, arsenic, lead, volatile organic compounds (VOCs), and total petroleum hydrocarbons (TPH). Kleinfelder compared the sample results to San Francisco Bay Regional Water Quality Control Board

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<sup>3</sup> American Society of Testing and Materials Standard Practice E 1527-05 defines "recognized environmental conditions" as "the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a part release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property."

(RWQCB) Tier 1 Environmental Screening Levels (ESLs) and DTSC's California Human Health Screening Levels (CHHSLs).<sup>4</sup> Kleinfelder concluded the following:

Arsenic and lead are present in shallow soils at the project site at concentrations that exceed their respective ESLs. In addition, arsenic concentrations at many of the sample sites exceed the CHHSL limits for commercial/industrial soil. Regulatory agencies including the DTSC and US EPA have acknowledged arsenic background concentrations of soils in California commonly exceed established arsenic human-health risk-based screening levels. It is possible that the arsenic concentrations present in the 0.5-foot and 3-foot bgs soil samples represent Site background concentrations for soil at those depths. The reported arsenic concentrations do not exceed the total thresholds limit concentration (TTL) for a California hazardous waste, and none warranted testing of the samples for soluble arsenic.

Lead was present at a concentration at or above its reporting limit in 74 of the 91 samples (including each sample from 0.5 foot bgs and 18 samples from 3 feet bgs), with reported concentrations ranging from 2.6 mg/kg to 160 mg/kg. Lead concentrations of 11 shallow soil samples exceed the soil "Tier 1" lead ESL (80 mg/kg) and the lead residential soil DTSC-SL (also 80 mg/kg), but are below the DTSC-SL for commercial/industrial soil of 320 mg/kg. Each reported lead concentration is below the lead RSLs for residential and industrial soil (400 mg/kg and 800 mg/kg, respectively).

- Groundwater sampling results indicate that TPH and VOCs were not present above ESLs or CHHSL limits and no further action is required.
- Soil vapor sampling results indicated that VOCs were not present at concentrations at or above its reporting limits and no further action is required.
- Organochlorine pesticides, VOCs, and TPH concentrations in soil samples did not exceed their respective ESL or CHHSL limits and no further action is required.
- Except for cobalt concentrations of the various other metals present in the soil samples were below their respective human health risk-based screening levels.

Based on the analytical results summarized above, arsenic and lead are present in shallow soil at the Site at concentrations that exceed their respective soil Tier 1 ESLs and residential soil DTSC-SLs. In addition, arsenic concentrations of many of the samples exceed the DTSC-SL for commercial/industrial soil.

During ground preparation and construction activities, construction workers could come in contact with and be exposed to arsenic that are present in soils. This impact would be **less than significant with** implementation of Mitigation Measure HAZ-1 because previously undiscovered and known hazardous substances would be removed and properly disposed of by a licensed contractor in accordance with federal, state, and local regulations, which are specifically designed to protect the public from human health hazards.

**Mitigation Measure HAZ-1: Retain a Licensed Professional to Investigate Known or Unknown Hazards and Hazardous Materials and Implement Required Measures, as Necessary.**

To reduce health hazards associated with potential exposure to hazardous substances, the project applicant and/or construction contractor(s) shall implement the following measures before the start of and during ground-disturbing activities:

- Retain a licensed contractor to remove the domestic well in accordance with applicable local, state, and federal regulations, including Placer County Environmental Health.
- Prepare and implement an analytical waste profile for off-site transportation and disposal of arsenic contaminated soils. Transportation and disposal of soils shall be in accordance with the regulations of Placer County Environmental Health; DTSC; or other appropriate federal, state, or local regulatory agencies.
- Notify the appropriate federal, state, and local agencies if evidence of previously undiscovered soil or groundwater contamination is encountered during construction activities. All construction activities shall be halted in the area of contamination and any contaminated areas shall be remediated in accordance

<sup>4</sup> The "Tier 1" Environmental Screening Levels were designed to protect properties with unrestricted land and water use, addressing media including soil, groundwater, and soil vapor, along with a range of concerns including direct exposure human health risks, impact on drinking water, vapor intrusion, and impact on aquatic life.

with recommendations made by Placer County Environmental Health; DTSC; or other appropriate federal, state, or local regulatory agencies.

#### 5.3.2.3.3 Handling of Hazardous Materials near Schools

The closest school to the project site is H. Clark Powers Elementary School, approximately 1.5 miles to the north. Therefore, the proposed project would have **no impact** related to the use of hazardous materials within one-quarter mile of a school. This issue is not evaluated further in the EIR.

#### 5.3.2.3.4 Airport Hazards

The project site is not within an existing airport land use plan. The project site is approximately 10 miles southeast of Lincoln Regional Airport. In addition, no private airstrips exist within 2 miles of the project site. Therefore, the proposed project would have **no impact** related to airport safety hazards. This issue is not evaluated further in the EIR.

#### 5.3.2.3.5 Emergency Response

Implementation of the proposed project would not interfere with any adopted emergency response or evacuation plans. The proposed project would be reviewed by the South Placer Fire District to ensure that the project would provide sufficient street width, circulation, and project access for fire and emergency response units consistent with the California Fire Code (see Section 5.3.9.1, "Fire Protection Services," below). Finally, the circulation plans for the proposed project, subject to review and approval of the Town of Loomis Public Works Department, would ensure that sufficient ingress and egress is available to ensure public safety in the event of an emergency (see Section 3.7, "Transportation and Traffic," for further discussion). Therefore, **no impact** related to interference with emergency response would occur and this issue is not evaluated further in the EIR.

### 5.3.2.4 Hydrology and Water Quality

Appendix G of the State CEQA Guidelines states that a project would have a significant impact if it would violate a water quality standard or waste discharge requirement that degrades surface or groundwater quality, substantially decrease groundwater recharge, alter existing drainage patterns in a manner resulting in downstream erosion or flooding, release pollutants during inundation in flood or conflict with a sustainable groundwater management plan.

#### 5.3.2.4.1 Violation of Water Quality Standards or Degradation of Water Quality

Construction of the proposed project under any Project Driveway Access Option would entail earthmoving activities that result in vegetation removal, grading, staging, trenching, and foundation excavation. All of these activities would expose soils to erosive forces and could transport sediment into local drainages. Although the project site is level, the potential exists for erosion to occur during and after construction, particularly during the rainy season. Intense rainfall and associated stormwater runoff could result in short periods of sheet erosion in areas of exposed or stockpiled soils. If uncontrolled, these soil materials could cause sedimentation and block drainage channels.

Nonstormwater discharges could result from activities such as construction dewatering, or from discharge or accidental spills of hazardous substances such as fuels, oils, petroleum hydrocarbons, concrete, paints, solvents, cleaners, or other construction materials. This contaminated runoff could enter on-site drainage channels, including Secret Ravine, and could ultimately drain off-site to downstream water bodies, including Dry Creek.<sup>5</sup> Therefore, uncontrolled, project-related construction activities could violate water quality standards or cause direct harm to aquatic organisms.

Perched groundwater was observed on the project site 1–10 feet below site grade. The geotechnical study determined that this perched groundwater is a result of heavy rainfall and is seasonal in nature, and that the depth depends on the amount of regional precipitation (Kleinfelder 2017a). Dewatering the project site could be necessary when construction activities occur after periods of rainfall. Although such water is generally considered relatively pollutant-free, it would likely contain sediments, particularly remnants of mud from excavations. Discharge of these sediments and the release of pollutants associated with the sediments could reach the underlying groundwater aquifer.

Operation of the proposed project would introduce sediments and other contaminants typically associated with urban development into stormwater runoff, potentially resulting in the degradation of downstream surface water quality.

<sup>5</sup> The project site is located approximately 600 feet east of Secret Ravine, a primary drainage that accepts runoff from nearby properties. Secret Ravine originates in the northeastern-most portion of the Dry Creek watershed and flows southwest in a narrow valley nearly parallel to I-80 before draining into Dry Creek. The upper reaches of Secret Ravine are all intermittent drainageways while the lower reaches are intermittent and perennial.

Approximately 86 percent of the project site would be covered by impervious surface in the form of buildings and a parking field. This conversion to urban uses would substantially increase the impervious surface area, which in turn would introduce fuel, oils, greases, fertilizers, sediments, and other urban pollutants into the stormwater runoff.

Stormwater runoff would sheet flow across the parking field, where it would be collected by curbs and swales before ultimately reaching a series of infiltration trenches along the perimeter of the property (see Figure 2-10 in Chapter 2, "Project Description"). Runoff would percolate through sand/filter soil and collect in catch basins inside the trenches before discharging into the drainage system, where it would be conveyed to one of three locations along Sierra College Boulevard. Infiltration trenches are designed and sized to meet the regulatory standards of the Phase I Municipal Separate Storm Sewer System permit issued by the Central Valley RWQCB. Specifically, all runoff generated during the 8th-percentile, 24-hour storm event on impervious surfaces constructed as part of the project would be treated before being released from the project site. Chapter 15.28.23, "Grading Standards, Erosion and Sediment Control," of the City of Rocklin Municipal Code and Chapter 12.04, "Grading, Erosion, and Sediment Control," of the Loomis Municipal Code requires preparation of an erosion and sediment control plan before issuance of a grading permit for development of the proposed project (City of Rocklin 2006; Town of Loomis 2017a). In addition, Chapter 14.36, "Subdivision Design Standards," of the Loomis Municipal Code specifies that storm drain systems must be designed based on the *Placer County Stormwater Management Manual* (Town of Loomis 2017b). Specifically, project designs must ensure that post-development stormwater runoff is reduced to 90 percent of the pre-development runoff rate for the 10-year and 100-year storm events (PCFCWCD 1994).

The project applicant would be required to submit a notice of intent and prepare a storm water pollution prevention plan (SWPPP) for review by the Central Valley RWQCB to receive coverage for project activities under the SWRCB's National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction Activities. The applicant would prepare and implement an erosion and sediment control plan consistent with Chapter 12.04 of the Loomis Municipal Code, Chapter 15.28.23 of the Rocklin Municipal Code and a final drainage plan consistent with Chapter 14.36 of the Loomis Municipal Code, and a SWPPP. These plans would contain BMPs specifically designed to prevent erosion and protect water quality and ensure that storm drains attenuate peak flows during storm events. BMPs and techniques to reduce soil erosion and siltation include, but are not limited to, temporary soil stabilization measures, sedimentation ponds, inlet protection, perforated riser pipes, check dams, and silt fences.

The project must also address operational impacts on water quality through preparation and implementation of a post-development stormwater management plan. The plan would incorporate nonstormwater management controls, permanent postconstruction BMPs, and inspection and maintenance responsibilities. BMPs may include spill prevention and contingency measures, including measures to prevent or clean up spills of hazardous waste and of hazardous materials used for equipment operation, and emergency procedures for responding to spills, personnel training requirements, and procedures that would be used to ensure that workers are aware of permit requirements and proper installation methods for BMPs specified in the SWPPP. Therefore, the impact of project construction and operation related to potential degradation of water quality, including both surface water and groundwater, or violation of any water quality standards or waste discharge requirements would be **less than significant**. These issues are not discussed further in this EIR.

#### 5.3.2.4.2 Alteration of Drainage Patterns

Grading and development of the project site would change the existing drainage patterns, thereby increasing the potential for on-site erosion and sedimentation and increasing the amount of surface runoff by adding impervious surfaces. When complete, approximately 86 percent of the project site would be covered by impervious surfaces in the form of buildings and a parking field. Adding these impervious surfaces would incrementally reduce the amount of natural soil surface available for the infiltration of rainfall and runoff. As a result, the frequency, volume, and flow rate of stormwater runoff would increase, potentially resulting in downstream flooding or potentially contributing to runoff exceeding the capacity of the Town's drainage system.

As stated above, Chapter 12.04, "Grading, Erosion, and Sediment Control," of the Loomis Municipal Code requires that a final drainage plan be prepared before issuance of a grading permit for development of the proposed project; and Chapter 14.36, "Subdivision Design Standards," of the Loomis Municipal Code specifies that storm drain systems must be designed based on the *Placer County Stormwater Management Manual* (Town of Loomis 2017a, 2017b).

The project applicant would prepare and submit final drainage plans to the Town of Loomis's Public Works Department consistent with requirements of Chapter 14.36 of the Loomis Municipal Code. The drainage plan would

demonstrate how on-site runoff would be appropriately contained and conveyed through the project site before being discharged into the off-site drainage systems. An accurate calculation of pre- and post-project runoff scenarios, would be included in the drainage plans that accurately evaluates potential changes to runoff, including increased surface runoff, and demonstrates that stormwater runoff rates at each point of discharge from the project site are reduced to 90% of the pre-development runoff rate for the 10-year and 100-year storm events pursuant to the *Placer County Stormwater Management Manual* Site design measures. The drainage plan would be reviewed to ensure protection from flooding and reduce downstream flooding. Impacts are less than significant and this topic is not studied further in the EIR.

#### 5.3.2.4.3 Groundwater Supplies and Recharge

Potable water supplies would be provided to the proposed project by Placer County Water Agency (PCWA). The majority of water supplies are provided by the American, Bear, and Yuba rivers. However, PCWA anticipates that groundwater would be used to meet demand during dry hydrologic conditions if surface water supplies become limited (PCWA 2016). As discussed in Section 5.3.11, "Utilities and Service Systems," PCWA's urban water management plan (UWMP) has determined that the water supplies for the proposed project would be sufficient to meet project demands through 2035 in normal, single-dry, and multiple-dry years (PCWA 2016). The forecast demand for water during the demand scenarios is based on growth projections that take into account buildout of uses in the service area. Because the project site is designated for commercial uses and the proposed project is consistent with the development intensity permitted on the property, the water demand that would be created by project operation has been accounted for in demand projections. Therefore, the additional water supply demand generated by the proposed project would not substantially deplete groundwater supplies.

Groundwater recharge commonly occurs along natural stream channels where sand and gravel deposits are present. Other sources of recharge include deep percolation from applied surface water and precipitation. NRCS soil survey data indicate that nearly the entire project site consists of soils that have a moderate infiltration rate when thoroughly wet and a moderate rate of water transmission (NRCS 2017). Thus, soils on the project site generally have a moderate capacity for groundwater recharge.

The geotechnical study prepared for the proposed project determined that the upper 10–20 feet of on-site soils consist primarily of silty sand overlying bedrock and the depth to groundwater on the project site is more than 50 feet below the ground surface (Kleinfelder 2017a). Seasonal perched groundwater was observed within these sandy soils above the bedrock. On-site soil conditions prevent this perched groundwater from infiltrating into the groundwater aquifer. Therefore, little if any precipitation is expected to infiltrate to the groundwater aquifer under undeveloped conditions, with the remaining water running off or consumed through evapotranspiration.

Development of the proposed project would create approximately 83% impervious surfaces on the project site, which could impede groundwater percolation. However, current soil conditions on the project site limit groundwater recharge; therefore, impervious surfaces would not affect infiltration patterns or groundwater recharge within the groundwater aquifer. Therefore, impacts of the proposed project associated with substantial depletion of groundwater or interference with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level would be **less than significant**. This issue is not discussed further in this EIR.

#### 5.3.2.4.4 Flooding Hazards

The most recent Federal Emergency Management Agency (FEMA) Flood Insurance Study Flood Insurance Rate Map (1998) indicates that the project site is located in Flood Zone X (FEMA 1998). Areas identified as FEMA Flood Zone X are areas of minimal flood hazard that are subject to 0.2 percent-annual-chance flood events.

However, the highest water surface elevation in the Loomis Tributary (also known as "Secret Ravine") near the project site is 322 feet, while the lowest existing site elevation is approximately 318 feet at the swale flowline before the crossing under Sierra College Boulevard. Based on those elevations, the project site could experience some inundation along the street frontage of Sierra College Boulevard and the frontage of Brace Road. Impacts related to flooding hazards would be **less than significant** since the project drainage system must be designed based on the *Placer County Stormwater Management Manual*. The preparation and implementation of a final drainage plan would ensure that storm drains attenuate peak flows during storm events. Therefore, this issue is not discussed further in this EIR.

#### 5.3.2.4.5 Inundation by Seiche, Tsunami, or Mudflow

Because of the distance of the project site from water bodies, the site would not be expected to be affected by coastal flooding hazards, including tsunamis, extreme high tides, or sea level rise. No surface water bodies are located in the vicinity of the project site that could generate damaging seiches (waves generated within enclosed surface water bodies); therefore, no effects are expected. In addition, the project site is relatively flat, and no effects related to mudflows would occur. **No impact** related to seiche, tsunami, or mudflow would occur, and these issues are not discussed further in this EIR.

#### 5.3.2.5 Land Use and Planning

Appendix G of the State CEQA Guidelines states that a project would have a significant impact if it would physically divide an established community or conflict with a plan adopted for avoiding or mitigating an environmental effect. No residential dwellings or existing communities are located on the project site. The surrounding areas consist of residential to the east, undeveloped land to the west, and commercial/industrial areas to the north and south. The proposed project is not a linear feature, such as a highway, that could divide an existing community.

Section 65300 of the California Government Code requires each county and city to adopt a general plan to guide development. The General Plan establishes the Town of Loomis's development goals and policies; sets the land use, housing, and development policies for the Town; and designates allowable land uses for all property throughout the Town. The updated General Plan was adopted by the Loomis Town Council in 2001.

Many of the General Plan policies applicable to the proposed project were adopted with the intent of reducing the environmental impacts of ongoing development, while land use designations were adopted to provide the long-range planning necessary to minimize conflicts between adjacent land uses and provide adequate infrastructure. Most of the project site is zoned as General Commercial (CG); a small portion on the east side is zoned as Medium Density Residential (RM-5), a small parcel on the north side is zoned as High Density Residential (RH), and the parcels to the south of the project site where the Granite Drive extension would be (under Options 1B and 1C) are zoned by the City of Rocklin as Retail Business, and as an automotive overlay zone. Most of the project site is designated in the General Plan as General Commercial, with a portion on the east side designated as Residential–Medium-High Density and a small parcel on the north as Residential–High Density.

The project has been designed so that it can be found consistent with the intent of the General Plan land use pattern that uses high and medium density residential as a means to buffer single family homes from the high intensity activity associated with the planned commercial use. The project does not require an amendment to the General Plan Land Use Map that would remove the planned transitional use because only parking areas and landscaped setbacks are proposed in the transitional use areas and such uses are allowed. The site plan provides an extensive landscape buffer separating homes from the warehouse and incorporates a solid privacy wall along the perimeter with residential uses. No structures would be constructed in the portions of the project site currently designated as Residential–Medium-High Density and Residential–High Density and zoned as RM-5 and R-H. Light poles are proposed adjacent to residential uses, including 28-foot high fixtures near the homes on Hunter and 32-foot high fixtures near the apartments. Although the current limit in the Code is 20 feet, a Code amendment would increase the allowed height for warehouse retail to the height of the warehouse building.

Commercial development in the Town Center would also allow a significant amount of growth in Loomis to be contained in the area north of I-80. This Project would be consistent with existing Town patterns of growth, as well as development trends along the I-80 corridor. Specifically, the General Plan Land Use Element provides the following issues and goals that are applicable to the project. Under each issue or goal is bulleted text explaining the relationship of the project to the General Plan.

#### **General Plan Land Use Element Issues (pg. 35):**

“The lack of street trees and landscaping in some commercial areas detracts from the Town’s aesthetic quality.”

- The Project proposes commercial development with street trees and a landscaping plan to enhance the aesthetic quality.

“Residents frequently shop outside of Town limits due to limited retail product availability in Loomis, thereby creating significant retail sales leakage.”

- The Project proposes commercial development that provides retail usage to residents and the community within the Town and helps reduce retail leakage.

"Many residents work outside of Town limits due to limited employment opportunities in Loomis."

- As a proposed retail development, the project would create new employment opportunities for Loomis residents.

"The increased public services and facilities desired by existing Town residents are dependent on property and sales tax revenues, which would increase with additional development of commercial and industrial uses."

- The Project would generate sales tax revenues that would benefit the community as those funds could be used for public purposes/services (law enforcement, fire protection, libraries, parks, road/public facility maintenance, etc.).

**General Plan Land Use Element Goals (page 36):**

"9. To improve the Town's commercial base to increase municipal revenues and provide a wider range of goods and services for local residents, in addition to encouraging some commercial uses near the freeway and in the downtown that can attract or serve patrons from outside the community."

- The Project would be near I-80 and would provide commercial uses that can attract and serve patrons from within the Town as well as outside the Town.

The General Plan designates most of the project site as General Commercial (GC), with a portion on the east side designated as Residential–Medium-High Density (RMH), and a parcel on the north side of the site designated as Residential-High Density (RH) (Figure 3.1-3). According to the General Plan, the GC designation is intended mainly for retail and service commercial uses located outside of the downtown core (Town of Loomis 2001). Zoning for the property is General Commercial (CG), High Density Residential (RH), and Medium Density Residential (RM-5) (Figure 3.1-3). CG zoning is applied to areas appropriate for a range of retail and service land uses, including shops, personal and business services, and restaurants. Residential uses may also be accommodated.

According to the General Plan, the General Commercial land use designation and the CG zoning district is intended mainly for retail and service commercial uses located outside of the downtown core, that primarily serve local residents and businesses (Town of Loomis 2001). As described in EIR Section 2.6, "Permits and Approvals," the Town would be required to approve issuance of a zoning text amendment to allow "warehouse retail" uses subject to specific criteria in the CG zoning district, with a "UP" (Use Permit Required).<sup>6</sup> Although Warehouse Retail is currently identified and listed in the Code for commercial zoning districts, it is not currently an allowed use in the districts. The amendment also limits the location within CG zoning where warehouse uses are considered appropriate. The zoning amendment also will change parking dimensions for compact cars from 10 to nine feet in width to reflect the current common sizing for compact spaces; revise lighting standards for warehouse uses to allow for higher poles greater than 20 feet in height, but less than the height of the warehouse structure; clarify the loading dock requirements and signalized driveway requirements for warehouse retail uses; and add definitions to the glossary as needed.

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<sup>6</sup> Allowed only within one-half mile of an existing interchange along I-80, and at least one-half mile from any Central Commercial (CC) zoning district, on a project site of at least 15 gross acres.

The proposed amendments are listed below **(bold)**:

TABLE 2-6  Allowed Land Uses and Permit Requirements for Commercial Zoning Districts	P	Permitted Use, Zoning Clearance required			
	MUP	Minor Use Permit required			
	UP	Use Permit required			
	S	Permit requirement set by Specific Use Regulations			
	—	Use not allowed			
LAND USE <sup>(1)</sup>	PERMIT REQUIRED BY DISTRICT				Specific Use Regulations
	CO <sup>(6)</sup>	CG <sup>(6)</sup>	CC <sup>(6)</sup>	CT <sup>(7)</sup>	
<b>RETAIL TRADE</b>					
Warehouse retail	—	<b>UP<sup>(11)</sup></b>	—	—	

**Notes:**

(1) See Division 8 for land use definitions.

(6) Use permit approval required for all new construction.

(7) Permit requirements established for the CT zoning district are for the replacement of land uses after initial site development. See Section 13.26.070.

(11) Warehouse retail is allowed only at locations within ½ mile of an I-80 interchange, and at least ½ mile from land zoned Central Commercial (CC) on sites with an aggregate size of 15 or more acres.

**13.36.090 - Parking design and development standards.**

Required parking areas shall be designed and constructed as follows.

**D. Parking Stall and Lot Dimensions.** Each parking stall, aisle, and other parking lot features shall comply with the minimum dimension requirements in Table 3-9, and as illustrated in Figure 3-8 except that, within all parking lots with noncovered spaces designed so that thirty-three and one-third percent of the required number of parking spaces shall be sized for compact cars (~~ten-nine~~ **feet** in width and sixteen feet in length) in order to provide for tree wells-and shall be clearly marked “Compact Cars Only” in nonresidential projects. Compact parking spaces shall be distributed throughout the parking lot as determined by the director. Residential garages shall comply with the “General Parking Stall Dimension Requirements” in Table 3-9.

**13.36.100 - Driveways and site access.**

Each driveway providing site access from a street, alley or other public right-of-way shall be designed, constructed and maintained as follows:

**D. Driveway Width and Length.**

- 1. Single-Family Dwellings.** Each single-family dwelling shall be provided a driveway with a minimum length of twenty from the back of the sidewalk, or the edge of the right-of-way where there is no sidewalk.
- 2. Nonresidential Uses.** A driveway for a nonresidential use shall have a minimum paved width of thirteen feet for a one-way driveway and twenty-six feet for a two-way driveway. The maximum driveway width shall be thirty feet, exclusive of the area provided for a median divider.
- 3. Signalized Driveways for Warehouse Retail Uses. A signalized driveway shall have two-way paved access and shall not exceed a maximum paved width of sixty feet.**

**13.36.110 - Loading space requirements.**

**A. Number of Loading Spaces Required.** Nonresidential uses shall provide off-street loading spaces in compliance with Table 3-11, below. Requirements for uses not listed shall be determined by the director based upon the requirements for comparable uses.



**TABLE 3-11 - REQUIRED LOADING SPACES**

<b>Type of Land Use</b>	<b>Loading Spaces Required</b>
Commercial uses	1 space for each 10,000 sf of floor area over the first 10,000.
<b>Warehouse retail uses</b>	<b>1 space for each 36,000 sf of floor area over the first 10,000.</b>
Manufacturing, and industrial uses	1 space, plus one additional space for each 10,000 sf of floor area over the first 10,000.
Office uses and public uses	1 space for each 25,000 sf of floor area.

**13.30.080 - Outdoor lighting.**

Outdoor lighting on private property shall comply with the following requirements.

A. Outdoor light fixtures shall be limited to a maximum height of twenty feet or the height of the nearest building, whichever is less. **Outdoor light fixtures associated with warehouse retail uses may exceed twenty feet, but shall not exceed the height of the warehouse structure.**

**13.80.020 – Definitions of specialized terms and phrases.**

As used in this title, the following terms and phrases shall have the meaning ascribed to them in this section, unless the context in which they are used clearly requires otherwise.

**F. Definitions, F.**

**Fuel dealer** means a retail trade establishment that sells fuel oil, butane, propane and liquefied petroleum gas (LPG), bottled or in bulk, to consumers.

**Fueling Station means a motor vehicle fueling component of a warehouse retail store, where warehouse consumers purchase bulk fuel from said warehouse retail store. Fueling stations are located adjacent to and operate in conjunction with a warehouse retail store. Fueling stations are an ancillary use of a warehouse retail use and are subject to siting and design requirements of the CG General Commercial zone Section 13.26.040 and are not subject to Section 13.42.100 regarding gas stations.**

**W. Definitions, W.**

Warehouse retail means a retail store that emphasizes the packaging and sale of products in large quantities or volumes, some at discounted prices, where products are typically displayed in their original shipping containers. **Warehouse retail includes associated sales of motor vehicle fuels at onsite Fueling Stations operated by the warehouse retail use.** Sites and buildings are usually large and industrial in character. Patrons may be required to pay membership fees.

With the exception of the amendment to compact parking spaces, these amendments are limited to Warehouse Retail uses, which are limited in location to CG zones only within one-half mile of an existing interchange along I-80, and at least one-half mile from any Central Commercial (CC) zoning district, on a project site of at least 15 gross acres. Therefore, the Code amendments would only be applicable within very few locations in the Town. These amendments would have no significant impact on Town land use.

As described in Section 3.1, “Regional Environmental Setting,” the project site lies within the boundaries of the *Loomis Town Center Master Plan*, which includes policies to maintain downtown Loomis as a focal point for personal shopping and services in the community. The Town Center area is designated as a Center and Corridor Community<sup>7</sup>

<sup>7</sup> Land uses in Center and Corridor Communities are typically higher density and more mixed than surrounding land uses. Centers and corridors are identified in local plans as historic downtowns, main streets, suburban or urban commercial corridors, rail station areas, central business districts, or town centers. They typically have more compact development patterns, a greater mix of uses, and a wider variety of transportation infrastructure than the communities that surround them.

in the Sacramento Area Council of Governments' *Metropolitan Transportation Plan/Sustainable Community Strategy* (MTP/SCS). The proposed project is consistent with the growth forecast contained in the MTP/SCS.<sup>8</sup>

Operation of the proposed project would be required to comply with all performance standards in Section 13.30.090 of the Municipal Code that are designed to limit impacts on adjacent uses. The code addresses:

- limits on visible smoke, dust, or gases;
- limits on handling, storage, and transportation of combustible materials;
- restrictions on light or glare;
- restrictions on odors or fumes;
- requirements on handling of liquid waste storage and disposal; and
- limits on electromagnetic and electrical disturbance.

Specific impacts on other resources and issue areas are addressed in each technical section of this EIR as appropriate. These technical sections provide a detailed analysis of other relevant physical environmental effects that could result from the proposed project. Land use inconsistencies are not physical effects on the environment. If the zoning text amendment is approved, implementation of the proposed project would not conflict with adopted zoning that would generate any adverse physical impacts beyond those addressed in detail in the environmental sections of this EIR (e.g., air quality, biological resources, cultural resources). Therefore, the project would not divide an established community or conflict with a plan adopted for avoiding or mitigating an environmental effect. The project would have a **less than significant impact**.

The relationship between the proposed project and any habitat conservation plans or natural community conservation plans is discussed in Section 3.4, "Biological Resources," of this EIR.

### City of Rocklin

For Project Driveway Access Options 1B and 1C, the Granite Drive access point would be on two privately-owned parcels within the City of Rocklin designated as Mixed Use in the General Plan and zoned for Retail Business (C-2) in an Automotive Overlay Zone (City of Rocklin 2016).

#### 5.3.2.6 Public Services and Recreation

Appendix G of the State CEQA Guidelines states that a project would have a significant impact if it would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities the construction of which creates an environmental impact to maintain acceptable service ratios, response times, or other performance objective.

The proposed project would not provide any new housing that generates new residences. Project construction and operation would not result in substantial in-migration of workers that would require new housing. As discussed above in Population and Housing, construction workers likely would come from the local labor pool, and the available labor force in Loomis is estimated to be 375 persons, which is enough to meet the demand for full-time positions to operate the project without in-migration of people from outside the region. Therefore, the project would not increase the demand for new schools, parks, recreational facilities, or other public facilities (i.e., libraries). No recreational facilities, schools, or public service structures or operations are proposed by the project. **No impact** would occur, and these issues are not evaluated further in this EIR.

##### 5.3.2.6.1 Fire Protection Services

Fire protection services would be provided to the project site by South Placer Fire District (formerly Loomis Fire Protection District) Fire Station 28 located at 5840 Horseshoe Bar Road, approximately 1 mile northeast of the project site.

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<sup>8</sup> The MTP/SCS contains regional growth forecasts and policies intended to implement smart growth principles, including housing choice, compact development, mixed-use development, natural resource conservation, use of existing assets, quality design, and transportation choice. The plan also provides options to increase transportation while reducing congestion, shortening commute times, and improving air quality.

The project applicant would be required to incorporate California Fire Code requirements. These standards address access road length, dimensions, and finished surfaces for firefighting equipment; security gate design requirements; fire hydrant placement; fire flow availability and requirements; and plan submittal requirements.

The Town of Loomis enforces building codes and other Town ordinances related to fire hazards and fire protection and requires that new development provide adequate water pressure and volume for firefighting (General Plan Public Health and Safety Element, Policy 1). The on-site water system would consist of lines ranging in size from 10 to 12 inches in diameter. The system would provide sufficient flow and pressure to meet fire department requirements of 1,600 gallons per minute at a residual pressure of 55 pounds per square inch for sprinklers and 4,000 gallons per minute at a residual pressure of 20 pounds per square inch for firefighting flow. Emergency access to the project site would be provided by Sierra College Boulevard and Brace Road, as well as the driveway at Granite Drive (under Options 1B or 1C). A 30-foot aisle would loop around the warehouse to provide emergency access. No gates are proposed that would limit access to the project site.

During review and approval of project plans and before issuance of building permits and occupancy permits, the project applicant would be required to demonstrate to the South Placer Fire District and the Town of Loomis's Building Department that applicable California Fire Code requirements have been incorporated into project designs. Incorporating all California Building Standards Code and South Placer Fire District requirements into project designs would reduce dependence on fire department equipment and personnel by reducing fire hazards. The proposed project would not affect South Placer Fire District's response times or other performance objectives and would not result in the construction of new or expansion of existing fire protection facilities. The project applicant would also pay development impact fees to the Town, used to fund road improvements to ensure adequate circulation, and to South Placer Fire District, to offset the project's impact related to the need for increased equipment or staffing. As of January 2019, the fire impact fee was set at \$1.32 per square foot of new construction. Impacts on fire protection services would be less than significant assuming compliance with the building code and payment of the development impact fee. Because the project applicant would demonstrate to the Town of Loomis Building Department that California Building Standards Code and South Placer Fire District requirements have been incorporated into project designs, and provide a will-serve letter from the South Placer Fire District indicating the District has the ability to serve the project, impacts are **less than significant**. Therefore, this issue is not evaluated further in the EIR.

#### 5.3.2.6.2 Police Protection Services

Police protection services would be provided to the project site by the Placer County Sheriff's Department (PCSD) substation located at 6140 Horseshoe Bar Road, approximately 1 mile northeast of the project site. The design of the proposed project would not create any obstacles to the provision of law enforcement services to the project site or to surrounding land uses. Criminal activities would be discouraged by providing 24-hour lighting around the warehouse and in the parking lots.

The proposed project would not add residents to Loomis; therefore, the project would not require additional PCSD staffing to maintain service ratios. In addition, the proposed project is located within the existing service area of the Department and would not decrease response times nor increase demand for PCSD services such that the construction of new or expansion of existing sheriff's service facilities would be required. The project design incorporates features intended to enhance security including construction of a solid wall along the northern and eastern boundary and incorporates landscaped setbacks to exclude access to adjacent residential neighborhoods. Impacts on police protection services would be **less than significant**. Therefore, this issue is not evaluated further in the EIR.

#### 5.3.2.7 Recreation

As discussed previously, the proposed project would not generate new residents in Loomis. Therefore, the project would not increase the use of existing or require construction of new neighborhood and regional parks or other recreational facilities. Additionally, Chapter 12.24 of the Loomis Municipal Code requires that all commercial development, including the proposed project, pay a passive park/open space, parkland fee, and park facilities fee to defray the cost of acquiring open space as new development occurs. Therefore, Costco is required to pay the open space and parkland fee to the Town at the time a building permit is issued. For these reasons, this action would be **beneficial**, no impact would occur, and this issue is not evaluated further in this EIR.

## 5.3.2.8 Utilities and Service Systems

### 5.3.2.8.1 Water Supply and Treatment

Placer County Water Agency would provide water to the project site. Loomis is located within PCWA's lower Zone 1, which includes the lower portion of the watershed below Auburn. Water for Zone 1 is delivered by contract through Pacific Gas & Electric Company's (PG&E's) Drum-Spauling hydroelectric system; water also comes from PCWA's Middle Fork American River Project. PCWA anticipates that its Zone 1 PG&E contract will provide a water supply of 100,400 acre-feet per year and that its North Fork American River water rights will provide 120,000 acre-feet per year (PCWA 2016). Demand for water generated by operation of Costco is estimated at 11.2 acre-feet per year.

The PCWA Urban Water Management Plan addresses water supply and demand issues, water supply reliability, water conservation, water shortage contingencies, and recycled water use within PCWA's service area. The UWMP determined that water supplies would be available to meet water demands in PCWA's service area in normal, single-dry, and multiple-dry years (PCWA 2016). The North Fork American River and PG&E water supplies are reliable and would be available in all water years. Recycled water is expected to be available during single-dry and multiple-dry water years by 2020. Any potential shortfall in supply in single-dry years may be addressed through groundwater production (PCWA 2016). Therefore, PCWA has adequate water supplies to meet the water supply demands of the proposed project.

The project would require construction of a looped water distribution system on-site that would connect to an 8-inch main in Sierra College Boulevard (see Figure 2-7 in Chapter 2, "Project Description"). The on-site system would consist of lines ranging in size from 10 to 12 inches in diameter. Development of such on-site infrastructure is included in the design of the proposed project, and the environmental impacts associated with its development are analyzed in the appropriate technical sections of this EIR. Physical impacts associated with construction of stormwater facilities are evaluated throughout this EIR in sections such as Section 3.3, "Air Quality"; Section 3.4, "Biological Resources"; and Section 5.3.2.4, "Hydrology and Water Quality."

The Foothill Water Treatment Plant (WTP) and Sunset WTP serve Zone 1 communities. These treatment plants, located in the southern portion of Newcastle and northwest of Loomis, have capacities of 55 million gallons per day (mgd) and 8 mgd, respectively (PCWA 2016). Therefore, the Foothill and Sunset WTPs would have sufficient capacity to serve the proposed project, and the project would not result in the construction of new or expansion of existing water treatment facilities.

Water is available on a first-come, first-served basis and availability is not guaranteed until the project applicant applies for service and pays fees. PCWA has indicated that potable water can be made available to the project site. For the reasons described above, the water supply would be sufficient to meet project-related demands. This impact would be **less than significant**. This issue is not discussed further in this EIR.

### 5.3.2.8.2 Wastewater Collection, Conveyance, and Treatment

South Placer Municipal Utility District (SPMUD) would serve the project site. SPMUD operates under a joint powers agreement between the City of Roseville, SPMUD, and Placer County. The regional facilities funded by SPMUD include recycled-water facilities, trunk sewer lines, and two wastewater treatment plants (WWTPs).

The proposed project would construct a network of sewer lines on-site, ranging in size from 6 to 8 inches in diameter, that would connect to an 8-inch sewer line located in Sierra College Boulevard. All sewer lines would be constructed to meet SPMUD's *Standard Specifications and Improvement Standard for Sanitary Sewers*. Development of such on-site infrastructure is included in the proposed project, and the environmental impacts associated with its development are analyzed in the appropriate technical sections of this EIR. Physical impacts associated with construction of stormwater facilities are evaluated throughout this EIR in sections such as Section 3.3, "Air Quality"; Section 3.4, "Biological Resources"; and Section 5.3.2.4, "Hydrology and Water Quality."

SPMUD recently constructed the Loomis Diversion Trunkline Project to accommodate new development in the project area. The Loomis Diversion Trunkline Project consists of new 15-inch and 18-inch pipelines from the southern end of Dias Lane to Horseshoe Bar Road. Construction of the Loomis Diversion Trunkline Project was completed in winter 2019 (Consolini, pers. comm., 2019). The Lower Loomis Diversion Trunkline will have adequate capacity to serve the proposed project.

Wastewater flows would be transported to the Dry Creek WWTP, located on Booth Road along Dry Creek in southwest Roseville. The Dry Creek WWTP has a NPDES permit issued by the Central Valley RWQCB for discharge

of up to 18 mgd of treated effluent into Dry Creek. As of 2015, the Dry Creek WWTP received and treated approximately 9.3 mgd average dry-weather flow each day, and the Dry Creek WWTP discharge constituents were below permitted discharge limits specified in the NPDES permit (PCLAFCO 2017). The proposed project would generate an average dry-weather flow of approximately 0.01 mgd. Wastewater flows generated by the proposed project (0.01 mgd) would not result in an increase in wastewater flows that would exceed the Dry Creek WWTP's current design capacity of 18 mgd average dry-weather flow. Therefore, the proposed project would not generate wastewater discharges that would exceed the Central Valley RWQCB's requirements and would not result in the construction of new or expansion of existing wastewater treatment facilities. Therefore, impacts associated with wastewater collection and conveyance facilities would be **less than significant**. This issue is not discussed further in this EIR.

#### 5.3.2.8.3 Stormwater Drainage Facilities

As discussed in Section 5.3.2, "Hydrology and Water Quality," new stormwater drainage facilities would be constructed on the project site. These facilities would consist of curbs, swales, infiltration trenches along the perimeter of the project site, and pipelines to collect stormwater runoff from neighboring properties along the northern boundary of the site. The project applicant would prepare a drainage plan demonstrating that on-site stormwater drainage facilities would be sized to appropriately contain and convey stormwater runoff through the project site before discharge into the off-site drainage systems.

Physical impacts associated with construction of stormwater facilities are evaluated throughout this EIR in sections such as Section 3.3, "Air Quality"; Section 3.4, "Biological Resources"; and Section 3.5, "Greenhouse Gas Emissions." Therefore, impacts associated with the construction of new stormwater drainage facilities or expansion of existing facilities would be **less than significant**.

#### 5.3.2.8.4 Solid Waste

Solid waste is collected in Loomis by Recology Auburn Placer. Solid waste is taken to the Western Regional Sanitary Landfill (WRSL), located at the intersection of Athens Avenue and Fiddymont Road in western Placer County. According to the California Department of Resources Recycling and Recovery (CalRecycle), the WRSL has a maximum permitted throughput of 1,900 tons per day (tpd); a total maximum permitted capacity of 36.4 million cubic yards; a remaining capacity of approximately 29.1 million cubic yards; and an anticipated closure date of January 1, 2058 (CalRecycle 2017).

Demolition and construction activities would generate various types of solid waste, including scrap lumber, scrap finishing materials, scrap metals, and other recyclable and nonrecyclable solid waste. The 2016 California Green Building Standards Code (CALGreen Code) (CCR Title 24, Part 11) requires all construction contractors to reduce construction waste and demolition debris by 65%. Code requirements include preparing a construction waste management plan that identifies materials to be diverted from disposal by efficient usage, recycling, reuse on the project, or salvage for future use or sale; determining whether materials will be sorted on-site or mixed; and identifying diversion facilities where the materials collected will be taken. The code also specifies that the amount of materials diverted should be calculated by weight or volume, but not by both (CBSC 2016). In addition, the 2016 CALGreen Code requires that 100% of trees, stumps, rocks, and associated vegetation and soils resulting primarily from land clearing be reused or recycled.

The project would comply with the requirements to prepare a construction waste management plan for submittal to the Town's Public Works Department. The construction waste management plan will demonstrate that project waste entering landfill facilities would be reduced by a minimum of 50% by weight through recycling. The waste management plan shall identify the sources of recyclable materials, identify if construction waste materials will be reused or recycled, outline a recycling method (self-separation or mixed recovery), and identify a self-haul or franchise waste hauler.

Construction of the proposed project would incorporate recycled materials into building designs. The building structure would consist of a pre-engineered system that uses 100% recycled steel. Roofing would be 100% recycled standing seam metal panels. The project applicant would comply with commercial recycling requirements consistent with AB 341. A recycling/reuse program would be implemented for the warehouse and office space. The program would involve recycling material such as tires, cardboard, grease, plastics, and electronics; no shopping bags would be used. In addition, suppliers would be required to reduce packaging and consider alternatives to packaging their products.

Two large-capacity compactors would be used for solid waste disposal. Collection of solid waste, including recycling, would be provided by Recology Auburn Placer. Solid waste collected from the project site would be hauled to the WRSL. CalRecycle estimates that the measured solid waste generation rate in Loomis in 2016 was 8.9 pounds per day (lb/day) per employee (CalRecycle 2016).<sup>9</sup> With 170 full-time employees present at full buildout, approximately 1,513 lb/day or 0.8 tpd of solid waste would be generated. The WRSL has a maximum permitted throughput of 1,900 tpd, a remaining capacity of approximately 29.1 million cubic yards, and an expected closure date of 2058 (CalRecycle 2017). The estimated 0.8 tpd of solid waste generated by the proposed project would be less than 1% of the maximum tpd that could be received at the landfill. Therefore, sufficient landfill capacity would be available to accommodate solid-waste disposal needs for the proposed project.

In addition, the proposed project does not include any components that would violate any applicable federal, state, or local solid waste regulations. The project would comply with all statutes and regulations related to solid waste, including the CALGreen Code, the Town's construction waste management plan, and commercial recycling programs. Therefore, impacts associated with the generation of solid waste would be **less than significant**. This issue is not discussed further in this EIR.

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<sup>9</sup> CalRecycle measures jurisdictional diversion and disposal rates in terms of per-capita disposal expressed as pounds per day (lb/day) per employee. The per capita disposal measurement system uses an actual disposal measurement based on population, disposal rates reported by disposal facilities, and program implementation efforts.