

# 3. Comments and Individual Responses

## 3.1 Introduction

This chapter contains the comment letters received on the 2019 RDEIR for the Loomis Costco Warehouse and associated fueling station project (the project). A list of each commenter on the 2019 RDEIR, the affiliation of the commenter, if any, and assigned letter identifications are provided in Section 3.2. Section 3.3 presents each comment letter received on the Recirculated DEIR and the responses thereto. Each comment contained in the comment letter is summarized in *italics* at the beginning of each comment response in Section 3.3.

## 3.2 List of Commenters

Table 3-1 provides a list of all agencies and persons who submitted comments on the Recirculated DEIR.

**Table 3-1. List of Commenters on the Recirculated DEIR**

Agency/Individual Name	Letter Date	Letter ID
State Agencies		
Caltrans Kevin Yount, Branch Chief	February 10, 2020	Caltrans
Central Valley Regional Water Quality Control Board Greg Hendricks	January 15, 2020	CVRWQCB
Department of Toxic Substances Control Gavin McCreary	January 3, 2020	DTSC
Governor's Office of Planning and Research State Clearinghouse and Planning Unit Scott Morgan, Director, State Clearinghouse	February 4, 2020	OPR
Regional and Local Agencies		
City of Rocklin Daniel S. Cucchi	February 10, 2020	City of Rocklin
Placer County Leigh Chavez, Principal Planner/Environmental Coordinator	February 10, 2020	Placer County
Placer County Air Pollution Control District Laura Moore, Air Pollution Control Specialist	February 10, 2020	PCAPCD
Placer County Sheriff Devon Bell, Sheriff-Coroner-Marshall	January 29, 2020	Placer County Sheriff
South Placer Fire District Jeff Ingolia	December 24, 2019	SPFD-1
South Placer Fire District Eric Walder, EFO, Fire Chief	February 10, 2020	SPFD-2
South Placer Municipal Utility District Carie Huff, P.E., District Engineer	February 10, 2020	SPMUD
Shingle Springs Band of Miwok Indians James Sarmento	January 9, 2020	Shingle Springs
Sierra College Laura Doty	February 7, 2020	Sierra College

**Table 3-1. List of Commenters on the Recirculated DEIR**

Agency/Individual Name	Letter Date	Letter ID
Individuals and Organizations		
Robert Auguscik	February 4, 2020	Auguscik
Cheryl Benson	February 8, 2020	Benson-1
Cheryl Benson	February 9, 2020	Benson-2
Cheryl Benson	February 10, 2020	Benson-3
Citizens Object	February 10, 2020	Citizens Object
Sonja Cupler	February 10, 2020	Cupler-1
Sonja Cupler	February 10, 2020	Cupler-2
Sandra Granada	December 27, 2019	Granada
Richard Jackson	February 9, 2020	Jackson-1
Richard Jackson	February 11, 2020	Jackson-2
Gary Liss	February 5, 2020	Liss
Thor Lude	February 3, 2020	Lude
Donald Mooney (Daljit Bains)	February 10, 2020	Mooney
Anna Nakashoji	February 4, 2020	Nakashoji-1
Anna Nakashoji	February 5, 2020	Nakashoji-2
Gerald Neal	February 11, 2020	Neal
Adam Noorani	February 10, 2020	Noorani
Roger Smith	February 5, 2020	Smith
Charlene Walters	December 29, 2019	Walters

## 3.3 Comments and Responses on the Recirculated DEIR

Comment letters and responses to comments are arranged in the following order:

- Section A: State Agencies
- Section B: Regional and Local Agencies
- Section C: Individuals

Each letter and each comment within a letter have been given an identification number. Responses are numbered so that they correspond to the appropriate comment. Where appropriate, responses are cross-referenced between letters.

This page intentionally left blank

### 3.3.1 Section A: State Agencies

This page intentionally left blank

### 3.3.1.1 Letter Caltrans, Kevin Yount, Branch Chief, February 10, 2020

#### DEPARTMENT OF TRANSPORTATION

DISTRICT 3  
703 B STREET  
MARYSVILLE, CA 95901  
PHONE (530) 741-4286  
FAX (530) 741-4245  
TTY 711  
www.dot.ca.gov/dist3

#### Letter Caltrans



Making Conservation  
a California Way of Life.

February 10, 2020

GTS# 03-PLA-2017-00516  
03-PLA-80 PM 7.723  
SCH # 2017052077

Anders Hauge  
Town of Loomis  
3665 Taylor Road  
Loomis, CA 95650

#### Loomis Costco Warehouse and Fuel Facility: Recirculated Draft EIR

Dear Mr. Hauge:

Thank you for including the California Department of Transportation (Caltrans) in the Initial Consultation review process for the project referenced above. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans through the lenses of our mission and state planning priorities of infill, conservation, and travel-efficient development. To ensure a safe and efficient transportation system, we encourage early consultation and coordination with local jurisdictions and project proponents on all development projects that utilize the multimodal transportation network.

Caltrans-1

The Loomis Costco Warehouse and Fuel Facility (Project) would build a warehouse with an ancillary fueling station on the project site. The 17-acre site is located at the southeast corner of the Sierra College Boulevard/Brace Road intersection. The project site consists of seven parcels. Interstate 80 (I-80) provides regional access to the site and Sierra College Boulevard provides local access.

Caltrans-2

The site plan for Option 1A and 1C provides 781 parking stalls, each 9 or 10 feet wide by 20 feet wide long, including 16 accessible stalls. The site plan for Option 1B provides 784 stalls of similar size. The site plan also provides 15 motorcycle parking spaces, each 5 feet wide, and 39 bicycle parking spaces. A 30-foot-wide drive aisle would loop around the warehouse, providing access to the entire property for emergency vehicles under all options.

*"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"*

The warehouse retail site would sell national brand and private-label merchandise for commercial and personal use. Other goods and services provided would include tire sales and installation, sales of motor vehicle fuel including diesel, optical exams and sales, a photo center and processing, hearing aid testing and sales, food service preparation and sales (including meat and baked goods), alcohol sales and tasting, and propane refueling. During seasonal sales promotions, temporary outdoor sales may occur within the parking field adjacent to the warehouse.

Caltrans-2  
(Cont.)

After review of the Draft EIR (DEIR), we are providing the following comments:

**Traffic Operations – Freeway Operations**

Traffic Operations is in full agreement with the proposed ramp metering upgrades intended for the Sierra College Boulevard interchange. The cooperative agreement is currently being developed.

Caltrans-3

**Hydraulics**

The DEIR should note that the hydraulic impact of the project with mitigation (Infiltration and Detention) will be less than significant assuming the post development runoff does not exceed 90% of the pre-development runoff per the Placer County Stormwater Management Manual.

Caltrans-4

The percentage of impervious surfaces in section 5.3.2.4.2 (86%) should be consistent with that stated in section 5.3.2.4.3. (83%).

If you have any question regarding these comments or require additional information, please contact Shannon Roberts, Intergovernmental Review Coordinator for Placer County, by phone (530) 740-4989 or via email to [Shannon.T.Roberts@dot.ca.gov](mailto:Shannon.T.Roberts@dot.ca.gov).

Sincerely,

  
FOR  
KEVIN YOUNT, Branch Chief  
Office of Transportation Planning  
Regional Planning Branch—East

*"Provide a safe, sustainable, integrated and efficient transportation system  
to enhance California's economy and livability"*



- Caltrans-1 *Caltrans thanks the Town for the opportunity to be included in the Initial Consultation review process for the project. Caltrans further states the Local Development-Intergovernmental Review Program reviews land use projects and plans.*
- The Town appreciates Caltrans' review of the EIR, coordination throughout this process, and the input provided to the Town for incorporation into the environmental documentation.
- Caltrans-2 *Caltrans provides details from the Recirculated DEIR project description.*
- The Town agrees with this summary characterization of the project.
- Caltrans-3 *Caltrans states traffic operations is in full agreement with the proposed ramp metering upgrades anticipated for the Sierra College Boulevard interchange.*
- The Town appreciates Caltrans' review of potential future conditions related to congestion and input that the Town was able incorporate into the project conditions.
- Caltrans-4 *Caltrans suggests the Recirculated DEIR should state that the hydraulic impact of the proposed project with mitigation will be less than significant, assuming post development runoff does not exceed 90% of the pre-development runoff. Caltrans further states the percentage of impervious surfaces in Section 5.3.2.4.2 should be consistent with that stated in Section 5.3.2.4.3.*
- As shown in Section 5.3.2.4.1, impacts related to the alteration of drainage patterns would be less than significant and runoff from the project site will not affect Caltrans facilities.
- The Town Engineer has reviewed the proposed site plan and has determined that compliance with existing regulatory requirements will avoid any significant impact. The exact percentage of impervious surfaces added to the site is less important than the requirements that will be imposed on the project through design and construction.
- As detailed on pages 5-11 through 5-13 of the Recirculated DEIR, the 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. The addition of impervious surfaces would increase the frequency, volume, and flow rate of stormwater runoff would increase. Chapter 12.04, "Grading, Erosion, and Sediment Control," of the Loomis Municipal Code requires a final drainage plan before issuance of a grading permit. 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 (Placer County Flood Control and Water Conservation District 1994). The project applicant will be required to prepare and submit final drainage plans to the Town of Loomis 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 will be required as a part of 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 less than or equal to 90 percent of the pre-development runoff rate for the 10-year and 100-year storm events, consistent with the Placer County Stormwater Management Manual Site design measures.

This page intentionally left blank

3.3.1.2 Letter Central Valley Regional Water Quality Control Board, Greg Hendricks, Environmental Scientist, January 15, 2020



**Letter CVRWQCB**



Central Valley Regional Water Quality Control Board

15 January 2020

**RECEIVED**

Anders Hauge  
Town of Loomis  
P.O. Box 1330  
Loomis, CA 95650

JAN 16 2020  
TOWN OF LOOMIS

**CERTIFIED MAIL**  
7019 0700 0002 0111 6371

**COMMENTS TO REQUEST FOR REVIEW FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT, LOOMIS COSTCO PROJECT, SCH#2017052077, PLACER COUNTY**

Pursuant to the State Clearinghouse's 20 December 2019 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Draft Environmental Impact Report* for the Loomis Costco Project, located in Placer County.

CVRWQCB-1

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

**I. Regulatory Setting**

**Basin Plan**

The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

CVRWQCB-2

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by the State Water Resources Control Board (State Water Board), Office

KARL E. LONGLEY ScD, P.E., CHAIR | PATRICK PULUPA, ESQ., EXECUTIVE OFFICER

11020 Sun Center Drive #200, Rancho Cordova, CA 95670 | [www.waterboards.ca.gov/centralvalley](http://www.waterboards.ca.gov/centralvalley)

of Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues. For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:  
[http://www.waterboards.ca.gov/centralvalley/water\\_issues/basin\\_plans/](http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/)

↑  
CVRWQCB-2  
(Cont.)

**Antidegradation Considerations**

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Implementation Policy is available on page 74 at:  
[https://www.waterboards.ca.gov/centralvalley/water\\_issues/basin\\_plans/sacsjr\\_201805.pdf](https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_201805.pdf)

In part it states:

*Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.*

CVRWQCB-3

*This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.*

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

**II. Permitting Requirements**

**Construction Storm Water General Permit**

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction Activities (Construction General Permit), Construction General Permit Order No. 2009-009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). For more information on the Construction General Permit, visit the State Water Resources Control Board website at:  
[http://www.waterboards.ca.gov/water\\_issues/programs/stormwater/constpermits.shtml](http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml)

CVRWQCB-4

**Phase I and II Municipal Separate Storm Sewer System (MS4) Permits<sup>1</sup>**

The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

CVRWQCB-5

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:  
[http://www.waterboards.ca.gov/centralvalley/water\\_issues/storm\\_water/municipal\\_permits/](http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/)

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at:  
[http://www.waterboards.ca.gov/water\\_issues/programs/stormwater/phase\\_ii\\_municipal.shtml](http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml)

**Industrial Storm Water General Permit**

Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 2014-0057-DWQ. For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:  
[http://www.waterboards.ca.gov/centralvalley/water\\_issues/storm\\_water/industrial\\_general\\_permits/index.shtml](http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml)

CVRWQCB-6

**Clean Water Act Section 404 Permit**

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACE). If a Section 404 permit is required by the USACE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements. If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACE at (916) 557-5250.

CVRWQCB-7

<sup>1</sup> Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.



**Clean Water Act Section 401 Permit – Water Quality Certification**

If an USACE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications. For more information on the Water Quality Certification, visit the Central Valley Water Board website at: [https://www.waterboards.ca.gov/centralvalley/water\\_issues/water\\_quality\\_certification/](https://www.waterboards.ca.gov/centralvalley/water_issues/water_quality_certification/)

CVRWQCB-8

**Waste Discharge Requirements – Discharges to Waters of the State**

If USACE determines that only non-jurisdictional waters of the State (i.e., “non-federal” waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation. For more information on the Waste Discharges to Surface Water NPDES Program and WDR processes, visit the Central Valley Water Board website at: [https://www.waterboards.ca.gov/centralvalley/water\\_issues/waste\\_to\\_surface\\_water/](https://www.waterboards.ca.gov/centralvalley/water_issues/waste_to_surface_water/)

CVRWQCB-9

Projects involving excavation or fill activities impacting less than 0.2 acre or 400 linear feet of non-jurisdictional waters of the state and projects involving dredging activities impacting less than 50 cubic yards of non-jurisdictional waters of the state may be eligible for coverage under the State Water Resources Control Board Water Quality Order No. 2004-0004-DWQ (General Order 2004-0004). For more information on the General Order 2004-0004, visit the State Water Resources Control Board website at: [https://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/water\\_quality/2004/wqo/wqo2004-0004.pdf](https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf)

**Dewatering Permit**

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Risk General Order) 2003-0003 or the Central Valley Water Board’s Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Risk Waiver) R5-2013-0145. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

CVRWQCB-10

For more information regarding the Low Risk General Order and the application process, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/water\\_quality/2003/wqo/wqo2003-0003.pdf](http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf)

For more information regarding the Low Risk Waiver and the application process, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/waivers/r5-2013-0145\\_res.pdf](http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2013-0145_res.pdf)

**Limited Threat General NPDES Permit**

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Limited Threat Discharges to Surface Water* (Limited Threat General Order). A complete Notice of Intent must be submitted to the Central Valley Water Board to obtain coverage under the Limited Threat General Order. For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:

[https://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/general\\_orders/r5-2016-0076-01.pdf](https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01.pdf)

**NPDES Permit**

If the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit. For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at:

<https://www.waterboards.ca.gov/centralvalley/help/permit/>

If you have questions regarding these comments, please contact me at (916) 464-4709 or [Greg.Hendricks@waterboards.ca.gov](mailto:Greg.Hendricks@waterboards.ca.gov).



Greg Hendricks  
Environmental Scientist

cc: State Clearinghouse unit, Governor's Office of Planning and Research,  
Sacramento (via email)

CVRWQCB-10  
(Cont.)

CVRWQCB-11

CVRWQCB-12

This page intentionally left blank



- CVRWQCB-1 *The comment states that the Central Valley Regional Water Quality Control Board (CVRWQCB) has reviewed the Recirculated DEIR for the proposed project and notes that CVRWQCB is charged with protecting the quality of surface and groundwater in the State.*  
The Town appreciates review of the draft environmental documentation.
- CVRWQCB-2 *CVRWQCB provides regulatory information on the Basin Plan.*  
As described in Recirculated DEIR Section 5.3.2.4, "Hydrology and Water Quality" (pages 5-11 through 5-14), the project applicant would prepare and implement a Storm Water Pollution Prevention Plan (SWPPP), as required by the State Water Resources Control Board's Construction General Permit, and the project's drainage system would be designed and operated in compliance with Placer County's MS4 permit. Therefore, construction and operation of the proposed project would protect beneficial uses designated in the Central Valley Basin Plan.
- CVRWQCB-3 *CVRWQCB notes that all wastewater discharges must comply with the State's Antidegradation Policy. CVRWQCB also states that the environmental document should evaluate potential impacts to surface and groundwater quality.*  
Project-related impacts on water quality were evaluated in Recirculated DEIR Section 5.3.2.4, "Hydrology and Water Quality" (pages 5-11 through 5-14). As discussed therein, implementation of the required SWPPP during construction and operation of the proposed drainage plan, in compliance with the County's MS4 permit, would prevent the proposed project from contributing to water quality degradation of downstream surface water and groundwater receiving water bodies, including Secret Ravine and Dry Creek. All water quality impacts are less than significant.
- CVRWQCB-4 *CVRWQCB provides information related to compliance with the Construction Storm Water General Permit.*  
Please see the Response to Comment CVRWQCB-3.
- CVRWQCB-5 *CVRWQCB provides requirements related to the Phase I and II Municipal Separate Storm Sewer System (MS4) Permits.*  
Please see the Response to Comment CVRWQCB-3.
- CVRWQCB-6 *CVRWQCB provides requirements related to the Industrial Storm Water General Permit.*  
Please see the Response to Comment CVRWQCB-3.
- CVRWQCB-7 *CVRWQCB provides requirements related to the Clean Water Act Section 404 Permit.*  
Project-related compliance with the Clean Water Act Section 404 Permit requirements is discussed in Recirculated DEIR Section 3.4, "Biological Resources" (pages 3.4-15 and 3.4-24). As noted on page 3.4-24, the project applicant must obtain a Section 404 permit from USACE and comply with the conditions therein and must also obtain a Section 401 water quality certification from the Central Valley RWQCB.
- CVRWQCB-8 *CVRWQCB provides requirements related to the Clean Water Section 401 Permit Water Quality Certification.*  
Please see the Response to Comment CVRWQCB-7.
- CVRWQCB-9 *CVRWQCB provides requirements related to the waste discharge requirements (WDRs) for discharges to non-jurisdictional waters of the state.*  
Project-related compliance with WDRs that are necessary for discharges to non-jurisdictional waters of the state is discussed in Recirculated DEIR Section 3.4, "Biological Resources" (pages

3.4-17 and 3.4-25). As noted on page 3.4-25, water quality certification pursuant to CWA Section 401, or WDRs for waters of the state, are required before the notice of determination and a Section 404 permit are issued. Before construction begins in any areas containing aquatic features, the project applicant would obtain water quality certification for the project. Any measures required as part of the issuance of water quality certification and/or WDRs must be implemented by the project applicant.

CVRWQCB-10

*CVRWQCB provides requirements related to coverage for dewatering discharges to land.*

If the proposed project requires dewatering discharges to land, the project applicant will obtain all necessary permits from CVRWQCB, including coverage under either the Low Risk General Order or the Low Risk Waiver.

CVRWQCB-11

*CVRWQCB provides requirements related to the Limited Threat General NPDES Permit for construction-related discharges to surface water.*

If the proposed project requires dewatering discharges to surface water, the project applicant will obtain all necessary permits from CVRWQCB, including a permit for construction dewatering under the Limited Threat General Order.

CVRWQCB-12

*CVRWQCB provides requirements related to coverage by an NPDES permit if the project If the proposed project discharges waste that could affect the quality of surface waters of the state, other than into a community sewer system.*

As described in Recirculated DEIR Chapter 2, "Project Description," and shown on Figure 2-10, "Drainage," all drainage generated at the project site would be conveyed to the existing community drainage system. Therefore, a separate NPDES permit for the proposed project would not be required.

3.3.1.3 Letter Department of Toxic Substances Control, Gavin McCreary, Project Manager, Site Evaluation and Remediation Unit, January 3, 2020

Letter DTSC



Jared Blumenfeld  
Secretary for  
Environmental Protection



Department of Toxic Substances Control

Meredith Williams, Ph.D., Director  
8800 Cal Center Drive  
Sacramento, California 95826-1320



Gavin Newsom  
Governor

RECEIVED

JAN 08 2020

TOWN OF LOOMIS

January 3, 2020

Mr. Anders Hauge  
Town of Loomis  
3665 Taylor Road, P.O. Box 1330  
Loomis, California 95650

LOOMIS COSTCO RECIRCULATED ENVIRONMENTAL IMPACT REPORT – DATED  
DECEMBER 2019  
(STATE CLEARINGHOUSE NUMBER: 2017052077)

Dear Mr. Hauge:

The Department of Toxic Substances Control (DTSC) received a Recirculated Environmental Impact Report (EIR) for a proposed Loomis Costco.

The proposed project is the construction and operation of a new approximately 155,000-square foot Costco Wholesale warehouse store on a 17.4-acre parcel. The EIR is being recirculated due to comments on the 2018 Draft EIR relating to traffic concerns.

DTSC recommends that the following issues be evaluated in the EIR, Hazards and Hazardous Materials section:

1. The EIR should acknowledge the potential for project site activities to result in the release of hazardous wastes/substances. In instances in which releases may occur, further studies should be carried out to delineate the nature and extent of the contamination, and the potential threat to public health and/or the environment should be evaluated. The EIR should also identify the mechanism(s) to initiate any required investigation and/or remediation and the government agency who will be responsible for providing appropriate regulatory oversight.
2. If any sites within the project area or sites located within the vicinity of the project have been used or are suspected of having been used for mining activities, proper investigation for mine waste should be discussed in the EIR. DTSC recommends that any project sites with current and/or former mining operations onsite or in the project site area should be evaluated for mine waste according to DTSC's 1998 Abandoned Mine Land Mines Preliminary Assessment Handbook ([https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/11/aml\\_handbook.pdf](https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/11/aml_handbook.pdf)).

DTSC-1  
DTSC-2  
DTSC-3

Printed on Recycled Paper

3. If buildings or other structures are to be demolished on any project sites included in the proposed project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with DTSC's 2006 *Interim Guidance Evaluation of School Sites with Potential Contamination from Lead Based Paint, Termiticides, and Electrical Transformers* ([https://dtsc.ca.gov/wpcontent/uploads/sites/31/2018/09/Guidance\\_Lead\\_Contamination\\_050118.pdf](https://dtsc.ca.gov/wpcontent/uploads/sites/31/2018/09/Guidance_Lead_Contamination_050118.pdf)).
4. If any projects initiated as part of the proposed project require the importation of soil to backfill any excavated areas, proper sampling should be conducted to ensure that the imported soil is free of contamination. DTSC recommends the imported materials be characterized according to *DTSC's 2001 Information Advisory Clean Imported Fill Material* ([https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/09/SMP\\_FS\\_Cleanfill-Schools.pdf](https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/09/SMP_FS_Cleanfill-Schools.pdf)).
5. If any sites included as part of the proposed project have been used for agricultural, weed abatement or related activities, proper investigation for organochlorinated pesticides should be discussed in the EIR. DTSC recommends the current and former agricultural lands be evaluated in accordance with DTSC's 2008 *Interim Guidance for Sampling Agricultural Properties (Third Revision)* (<https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/09/Ag-Guidance-Rev-3-August-7-2008-2.pdf>).

DTSC appreciates the opportunity to review the EIR. Should you need any assistance with an environmental investigation, please submit a request for Lead Agency Oversight Application, which can be found at: [https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/09/VCP\\_App-1460.doc](https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/09/VCP_App-1460.doc). Additional information regarding voluntary agreements with DTSC can be found at: <https://dtsc.ca.gov/brownfields/>.

DTSC-4

DTSC-5

DTSC-6

DTSC-7

Mr. Anders Hauge  
January 3, 2020  
Page 3

If you have any questions, please contact me at (916) 255-3710 or via email at [Gavin.McCreary@dtsc.ca.gov](mailto:Gavin.McCreary@dtsc.ca.gov).

Sincerely,



Gavin McCreary  
Project Manager  
Site Evaluation and Remediation Unit  
Site Mitigation and Restoration Program  
Department of Toxic Substances Control

cc: (via email)

Governor's Office of Planning and Research  
State Clearinghouse  
[State.Clearinghouse@opr.ca.gov](mailto:State.Clearinghouse@opr.ca.gov)

Ms. Lora Jameson, Chief  
Site Evaluation and Remediation Unit  
Department of Toxic Substances Control  
[Lora.Jameson@dtsc.ca.gov](mailto:Lora.Jameson@dtsc.ca.gov)

Mr. Dave Kereazis  
Office of Planning & Environmental Analysis  
Department of Toxic Substances Control  
[Dave.Kereazis@dtsc.ca.gov](mailto:Dave.Kereazis@dtsc.ca.gov)

- DTSC-1 *DTSC provides a brief summary of the proposed project.*  
The Town appreciates this review of the environmental documentation and agrees with this characterization of the project.
- DTSC-2 *DTSC recommends that the EIR acknowledge the potential for site activities to release hazardous waste/substances, and in instances where releases could occur, further studies should be carried out to delineate the nature and extent of contamination and to evaluate the potential threat to human health and the environment. DTSC also recommends that the EIR identify mechanisms to initiate any required investigation and/or remediation, including the agency that would provide regulatory oversight.*  
Section 5.3.2.3.2 of the Recirculated DEIR analyzes human health hazards from exposure to existing hazardous materials. As discussed therein, the impact is considered potentially significant because construction workers could come in contact with, and be exposed to, elevated levels of arsenic and lead that are present in soils. However, this impact would be reduced to a less-than-significant level with implementation of Mitigation Measure HAZ-1 (see pages 5-9 through 5-10 of the Recirculated Draft EIR).
- DTSC-3 *DTSC recommends that if the project area or sites in vicinity have been used for mining, proper investigation for mine waste should be discussed in EIR.*  
Section 5.3.2.3 of the Recirculated DEIR analyzes impacts related to hazardous materials comprehensively (Recirculated DEIR page 5-8 through 5-11). Neither the project area nor sites in the vicinity are known to have been used for mining activities.
- DTSC-4 *DTSC recommends that if buildings or structures would be demolished, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos-containing materials, and polychlorinated biphenyl caulk, and that any such materials should be removed and disposed of in compliance with State regulations.*  
The proposed project does not require the demolition of any buildings or other structures that could contain the referenced substances.
- DTSC-5 *DTSC recommends that if the proposed project requires imported soil for backfill of excavated areas, sampling should be conducted to ensure the imported soil is free of contamination.*  
The project does not require imported soil.
- DTSC-6 *DTSC recommends that a potential investigation of organochlorinated pesticides should be addressed in the EIR if the site was used for agricultural, weed abatement, or related activities.*  
Section 5.3.2.3 of the Recirculated DEIR analyzes impacts from hazardous materials comprehensively. The Phase II Environmental Site Assessment (ESA) completed for the proposed project tested site soils for organochloride pesticides. Organochloride pesticide concentrations did not exceed their respective Environmental Screening Levels or DTSC's California Human Health Screening Levels, and therefore no further action is required (see pages 5-9 through 5-10 of the Recirculated Draft EIR).
- DTSC-7 *The comment states that DTSC appreciates the opportunity to review the Recirculated DEIR and provides web link to submit a request for Lead Agency Oversight Application if any assistance is needed with an environmental investigation.*  
The Town appreciates DTSC's review and the additional information.



3.3.1.4 Letter Governor's Office of Planning and Research, State Clearinghouse and Planning Unit, Scott Morgan, Director, State Clearinghouse, February 4, 2020



Gavin Newsom  
Governor

STATE OF CALIFORNIA  
Governor's Office of Planning and Research  
State Clearinghouse and Planning Unit



Kate Gordon  
Director

February 4, 2020

RECEIVED

FEB 07 2020

TOWN OF LOOMIS

Anders Hauge  
Loomis, City of  
3665 Taylor Road/ P.O Box 1330  
Loomis, CA 95650

Subject: Loomis Costco Recirculated Environmental Impact Report  
SCH#: 2017052077

Dear Anders Hauge:

The State Clearinghouse submitted the above named EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on 2/3/2020, and the comments from the responding agency (ies) is (are) available on the CEQA database for your retrieval and use. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

**Check the CEQA database for submitted comments for use in preparing your final environmental document: <https://ceqanet.opr.ca.gov/2017052077/4>.** Should you need more information or clarification of the comments, **we recommend that you contact the commenting agency directly.**

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

cc: Resources Agency

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044  
TEL 1-916-445-0613 state.clearinghouse@opr.ca.gov www.opr.ca.gov

OPR-1

*OPR notes the EIR has been submitted to selected state agencies for review. OPR further notes the review period closed on 2/3/2020 and the comments received will be available on the CEQA database. The OPR comment letter acknowledges the Town has complied with the State Clearinghouse review requirements.*

The Town appreciates the efforts of the Clearinghouse to circulate the EIR among State agencies and compile the comments for incorporation into this Final EIR. In addition to the review period referenced in OPR's comment letter, the Town provided an additional review period beyond the time period recommended in State guidance, and comments were accepted through February 10, 2020 and two comments included in this Final EIR were submitted on February 11, 2020.