

CHAPTER 10.0 UNAVOIDABLE ADVERSE IMPACTS

Detailed mitigation measures have been identified throughout Chapter 4 and 5 of this report that are intended to mitigate project effects to the extent feasible. All of these mitigation measures are identified in Table 2.3-1. After implementation of the proposed mitigation measures, most of the adverse effects associated with the proposed project would be reduced to a *less-than-significant* level. However, some impacts would remain significant and unavoidable following the implementation of identified mitigation measures. These impacts include the following:

- **Short-Term Construction-Generated Criteria Air Pollutant and Precursor Emissions.** Based on the modeling conducted, project construction would result in worst-case maximum unmitigated daily emissions of approximately 182 lb/day of ROG, 53 lb/day of NO_x, 199 lb/day of PM₁₀, and 56 lb/day of CO. Daily unmitigated construction-generated emissions would not exceed PCAPCD's significance thresholds of 82 lb/day for NO_x or 550 lb/day for CO. However, unmitigated construction-generated emissions of ROG and PM₁₀ would exceed PCAPCD's significance threshold of 82 lb/day. Thus, ROG and PM₁₀ emissions could violate an air quality standard or contribute substantially to an existing or projected air quality violation, especially considering Placer County's nonattainment status. As a result, this impact is considered *significant and unavoidable*.
- **Contribution to Long-Term Operational (Regional) Criteria Air Pollutants.** Based on the modeling conducted, project operations would result in worst-case maximum unmitigated daily emissions of approximately 91.58 lb/day of ROG, 121.10 lb/day of NO_x, 133.40 lb/day of PM₁₀, and 849.28 lb/day of CO. Daily unmitigated operational emissions would exceed Placer County Air Pollution Control District's (PCAPCD) significance thresholds of 82 lb/day for ROG, NO_x, and PM₁₀, or 550 lb/day for CO during the winter and NO_x, PM₁₀, and CO during the summer periods. In addition, because PCAPCD's significance thresholds approximately correlate with reductions from heavy-duty vehicles and land use project emission reduction requirements in the SIP, project implementation would also be anticipated to conflict with current air quality planning efforts. As a result, this impact is considered *significant and unavoidable*. This conclusion is consistent with the 1991 City of Rocklin General Plan EIR, which concluded that mobile-source emissions associated with General Plan buildout would result in significant and unavoidable regional air quality impacts.
- **Loss of Native Oak and Heritage Trees:** Implementation of the proposed project would result in the removal of the majority of the native oak trees on the site, including 9 heritage trees and other mature, healthy oak trees. This impact can be mitigated to a less than significant level over the long-term through the relocation or replanting of lost trees but would be *significant and unavoidable in the short-term* because the removed trees would not be immediately replaced with mature oak trees.
- **Loss of Oak Woodland Habitat:** Implementation of the proposed project would result in the removal of the majority of the native oak trees on the site. This impact would be considered **potentially significant** due to the specific characteristics of the oak woodland habitat on the proposed project site. This impact can be mitigated to a less than significant level over the long-

term through the relocation or replanting of lost trees but would be *significant and unavoidable in the short-term* because the removed trees would not be immediately replaced with mature oak trees.

- **Contribution to Operational Transportation LOS Deficiency.** For the baseline plus project scenario, several intersections will be directly impacted by the project. The projected baseline and baseline plus project LOS for study area intersections and roadway segments are further described in Section 4.7.3 of the Transportation and Circulation chapter of this EIR. Because the Town of Loomis and Placer County control or partially control what occurs at the impacted intersections, and because the City is uncertain as to whether the Town or the County would be willing to cooperate with regard to construction of the contemplated improvements within a reasonable period of time, the City conservatively concludes that, at the time of action by its City Council on the proposed project, the impact would be treated as *significant and unavoidable*. Should Loomis or Placer County cooperate with the City and project applicant to ensure construction of the contemplated improvements within a reasonable period of time, the impacts would be successfully mitigated to a less than significant level. The following intersections are considered significant and unavoidable without the cooperation of the Town of Loomis and Placer County:
 - **Sierra College Boulevard/Taylor Road (Loomis).** The addition of project-related traffic to baseline traffic volumes would degrade traffic operations at the already-deficient Sierra College Boulevard/Taylor Road (Loomis) intersection, which is operating at LOS D during the a.m. peak hour and LOS F during the p.m. peak hour in the existing plus approved projects (baseline) condition. This intersection already operates unacceptably and the project's contribution would be greater than 5 percent, in the a.m. and p.m. peak hour and the project also degrades the LOS at this intersection from LOS C to LOS D during the Saturday peak hour.
 - **Sierra College Boulevard/Brace Road (Loomis).** The addition of project-related traffic to baseline traffic volumes would degrade traffic operations at the Sierra College Boulevard/Brace Road (Loomis) intersection from an already deficient LOS D during the p.m. peak hour to LOS F and from an acceptable LOS A during the Saturday peak hour to LOS D.
 - **Sierra College Boulevard/Granite Drive.** The addition of project-related traffic to baseline traffic volumes would degrade traffic operations at the already deficient Sierra College Boulevard/Granite Drive intersection, which is operating at a LOS of F during the p.m. peak and LOS E during the Saturday peak hours in the existing plus approved projects (baseline) condition. This intersection already operates unacceptably and the project's contribution would be greater than 5 percent.
 - **Horseshoe Bar Road/Taylor Road (Loomis).** The addition of project-related traffic to baseline traffic volumes would degrade traffic operations at the already-deficient Horseshoe Bar Road/Taylor Road (Loomis) intersection which is operating at LOS E with a volume to capacity ratio of 0.956 during the p.m. peak hour in the existing plus approved projects (baseline) condition. The intersection will operate at LOS F with a v/c ratio of 1.008 after the addition of project traffic.

- **Contribution to Long-Term Operational Transportation LOS Deficiency.** For both the 2025 with and without Dominguez Road scenarios, several intersections and roadways will be impacted by the project on a cumulative basis. The projected 2025 LOS for study area intersections and roadway segments are further described in Section 5.1.2 of the Cumulative Impacts chapter of this EIR. Because the Town of Loomis and Placer County control what occurs at their intersections and roadway segments, and because the City is uncertain as to whether the Town or the County would be willing to cooperate with regard to construction of the contemplated improvements within a reasonable period of time, the City conservatively concludes that, at the time of action by its City Council on the proposed project, the impact would be treated as *significant and unavoidable*. Should Loomis or Placer County cooperate with the City and project applicant to ensure construction of the contemplated improvements within a reasonable period of time, the impacts would be successfully mitigated to a less than significant level. The following intersections are considered significant and unavoidable without the cooperation of the Town of Loomis and Placer County:
 - **Sierra College Boulevard/Taylor Road (Loomis) without Dominguez Road.** The addition of project-related traffic to baseline 2025 No project traffic volumes would degrade traffic operations at the already-deficient Sierra College Boulevard/Taylor Road (Loomis) intersection, which is operating at LOS E during the p.m. peak hour in 2025 no project Without Dominguez Road scenario.
 - **Horseshoe Bar Road/Taylor Road (Loomis) without Dominguez Road.** The addition of project-related traffic to baseline 2025 No project traffic volumes would degrade traffic operations at the already-deficient Horseshoe Bar Road/Taylor Road (Loomis) intersection which is operating at LOS E with a volume to capacity ratio of 0.975 during the p.m. peak hour and from an acceptable LOS C during the Saturday peak hour to LOS D in the 2025 without Dominguez with project condition.
 - **Barton Road/Rocklin Road (Loomis) without Dominguez Road.** The addition of project-related traffic to baseline 2025 No project traffic volumes would degrade traffic operations at the already-deficient Barton Road/Rocklin Road (Loomis) intersection, which is operating at LOS E during the a.m. peak hour and from an acceptable LOS C during the p.m. peak hour to LOS D in the 2025 without Dominguez with project condition.
 - **Sierra College Boulevard/English Colony Way (Placer County) without Dominguez Road.** The addition of project-related traffic to baseline 2025 No project traffic volumes would degrade traffic operations at the already-deficient Sierra College Boulevard/English Colony Way (Placer County) intersection, which is operating at LOS F during the p.m. peak hour and LOS E during the Saturday peak hour in the 2025 without Dominguez Road with project scenario. This intersection already operates unacceptably and the project's contribution would be greater than 5 percent.
 - **Sierra College Boulevard/Taylor Road (Loomis) with Dominguez Road.** The addition of project-related traffic to baseline 2025 No project traffic volumes would degrade traffic operations at the already-deficient Sierra College Boulevard/Taylor Road (Loomis) intersection, which is operating at LOS E during the p.m. peak hour in 2025 no project With Dominguez Road scenario. This intersection already operates unacceptably and the project's contribution would be greater than 5 percent.

- **Horseshoe Bar Road/Taylor Road (Loomis) with Dominguez Road.** The addition of project-related traffic to baseline 2025 No project traffic volumes would degrade traffic operations at the already-deficient Horseshoe Bar Road/Taylor Road (Loomis) intersection which is operating at LOS E with a volume to capacity ratio of 0.968 during the p.m. peak hour D in the 2025 with Dominguez with project condition. This intersection already operates unacceptably and the project's contribution would be greater than 5 percent.
- **Barton Road/Rocklin Road (Loomis) with Dominguez Road.** The addition of project-related traffic to baseline 2025 No project traffic volumes would degrade traffic operations at the already deficient Barton Road/Rocklin Road (Loomis) intersection, which is operating at LOS F during the a.m. peak hour and from an acceptable LOS C during the p.m. and Saturday peak hour to LOS D in the 2025 with Dominguez with project condition.
- **Sierra College Boulevard/English Colony Way (Placer County) with Dominguez Road.** The addition of project-related traffic to baseline 2025 No project traffic volumes would degrade traffic operations at the already-deficient Sierra College Boulevard/English Colony Way (Placer County) intersection, which is operating at LOS F during the p.m. peak hour and LOS E during the Saturday peak hour in the 2025 with Dominguez Road with project scenario. This intersection already operates unacceptably and the project's contribution would be greater than 5 percent.
- **Improvements Required by the Mitigation Measure for Sierra College Boulevard between Dominguez Road and Rocklin Road.** The southbound through lane contemplated by the Measure would require pavement widening within the existing right of way with potential slope easement from the adjacent property owners. The impacts of these improvements to Sierra College Boulevard between Dominguez Road and Rocklin Road have been analyzed in the Draft EIR for the Sierra College Boulevard Widening Project, certified by the City of Rocklin in May of 2009. As a result of the relationship of the proposed project with the Sierra College Boulevard Widening Project, the environmental document prepared for the widening project serves as reference for this DEIR and is, therefore, incorporated by reference. The Sierra College Boulevard Widening Project EIR document is available for review at the City of Rocklin, Community Development Department, 3970 Rocklin Road, Rocklin, California 95677; phone (916) 625-5160. The document is referred to as follows:

LSA Associates, Inc. Draft Sierra College Boulevard Widening Project Environmental Impact Report, October, 2008. SCH# 2006122030. Certified by the City of Rocklin on May 12, 2009.

The Draft EIR for the Sierra College Boulevard Widening Project notes that potentially significant impacts were identified in the following areas: Geophysical Resources, Air Quality, Water Quality, Biological Resources, Noise and Cultural Resources. Mitigation measures were added to reduce these potential effects to a less than significant level. Only one unavoidable adverse impact, short-term removal of oak trees, was identified as part of the proposed project, necessitating a Statement of Overriding Considerations prior to approval of the Sierra College Boulevard Widening Project. As the implementation of the Mitigation Measure would include improvements that, as analyzed in the EIR for the Sierra College Boulevard Widening Project, would contribute to short-term significant effects associated with the removal of oak trees, this measure, and thus the Rocklin Commons project, would cause a *significant and unavoidable* short-term effect on oak trees.

- **Improvements Required by the Mitigation Measure for Sierra College Boulevard/Brace Road (Loomis).** The lane additions and lane tapers required for the Mitigation Measure would require pavement widening within the existing road right of way with potential slope easements from adjacent property owners.

The impacts of these improvements to the intersection of Sierra College Boulevard and Brace Road have been analyzed in the EIR for the Sierra College Boulevard Widening Project, prepared by the City of Rocklin, October 2008, which has been incorporated by reference. The Draft EIR notes that potentially significant impacts were identified in the following areas Geophysical Resources, Air Quality, Water Quality, Biological Resources, Noise and Cultural Resources. Mitigation measures were added to reduce these potential effects to a less than significant level. Only one unavoidable adverse impact, short-term removal of oak trees, was identified as part of the proposed project, necessitating a Statement of Overriding Considerations prior to approval of the Sierra College Boulevard Widening Project. As the implementation of the Mitigation Measure 3 would include improvements that, as analyzed in the EIR for the Sierra College Boulevard Widening Project, would contribute to short-term significant effects associated with the removal of oak trees, this measure, and thus the Rocklin Commons project, would cause a *significant and unavoidable* short-term effect on oak trees.

- **Improvements Required by the Mitigation Measure for Sierra College Boulevard/Granite Drive.** The southbound through lane contemplated by the Mitigation Measure can be implemented with restriping of existing pavement only. The existing “right turn only” lane would be converted to a shared “through/right turn” lane and there is existing improvement on the south side of the intersection to accept the second through lane. The second northbound through lane can be implemented within existing pavement on the south side of the intersection. On the north side there is sufficient pavement for about 300 feet, however, there is not sufficient pavement for a transition from two lanes to one. This would require at least 300 feet of additional improvement. This would require pavement widening within the existing road right of way with potential slope easement from the adjacent property owner.

The impacts of these improvements to the intersection of Sierra College Boulevard and Granite Drive have been analyzed in the EIR for the Sierra College Boulevard Widening Project, prepared by the City of Rocklin, October 2008, which has been incorporated by reference. The Draft EIR notes that potentially significant impacts were identified in the following areas Geophysical Resources, Air Quality, Water Quality, Biological Resources, Noise and Cultural Resources. Mitigation measures were added to reduce these potential effects to a less than significant level. Only one unavoidable adverse impact, short-term removal of oak trees, was identified as part of the proposed project, necessitating a Statement of Overriding Considerations prior to approval of the Sierra College Boulevard Widening Project. As the implementation of the Mitigation Measure would include improvements that, as analyzed in the EIR for the Sierra College Boulevard Widening Project, would contribute to short-term significant effects associated with the removal of oak trees, this measure, and thus the Rocklin Commons project, would cause a *significant and unavoidable* short-term effect on oak trees.

- **Improvements Required by the Mitigation Measure for Sierra College Boulevard/Rocklin Road.** The Mitigation Measure requires the applicant to contribute fees to be used to build an additional northbound left-turn lane and an additional southbound right-turn lane at the intersection of Sierra College Boulevard and Rocklin Road. The additional lanes would require widening of the existing pavement.

The impacts of these improvements to the intersection of Sierra College Boulevard and Rocklin Road have been analyzed in the EIR for the Sierra College Center Project, prepared by the City of Rocklin, September 2006, which has been incorporated by reference. As a result of the relationship of the proposed project with the Sierra College Center Project, the environmental document prepared for the Sierra College Center project serves as reference for this DEIR and is, therefore, incorporated by reference. The Sierra College Center Project EIR is available for review at the City of Rocklin, Community Development Department, 3970 Rocklin Road, Rocklin, California 95677; phone (916) 625-5160. The document is referenced as follows:

- Raney Planning and Management, Inc., Sierra College Center Draft Environmental Impact Report, September, 2006. SCH# 2006052130. Certified by the City of Rocklin on March 20, 2007.
- The Draft EIR notes that potentially significant impacts were identified in the following areas: Biological Resources and Transportation and Circulation. Mitigation measures were added to reduce these potential effects to a less than significant level. Only one unavoidable adverse impact, short-term removal of oak trees, was identified as part of the proposed project, necessitating a Statement of Overriding Considerations prior to approval of the Sierra College Center Project. As the implementation of the Mitigation Measure would include improvements that, as analyzed in the EIR for the Sierra College Center Project, would contribute to short-term significant effects associated with the removal of oak trees, this measure, and thus the Rocklin Commons project, would cause a significant and unavoidable short-term effect on oak trees.
- **Cumulative Regional Air Quality Emissions.** The proposed project would increase criteria air pollutant and precursor emissions in the region for long-term operational conditions above significance thresholds. Because feasible mitigation measures are not available to reduce these emissions below the significance thresholds, this impact would be considered a *significant and unavoidable* impact.
- **Cumulative Biological Resource Impacts.** The City of Rocklin General Plan EIR concluded that implementation of general plan policies, the existing tree protection ordinances, and ongoing wetlands preservation practices, would not be adequate to reduce the loss of vegetation and wildlife habitat associated with cumulative development. Because the cumulative biological impacts of development are identified in the General Plan EIR as significant and unavoidable, and the project would contribute measurably to this change, the project's contribution to these biological resource impacts would be considered cumulatively considerable and thus *significant and unavoidable*.

In light of the adverse impacts identified, a Statement of Overriding Considerations is needed prior to project approval.